

December 12, 2017

Kansas Corporation Commission

Conservation Division

Received
KANSAS CORPORATION COMMISSION

DEC 14 2017

CONSERVATION DIVISION
WICHITA, KS

Dear Commissioners,

It is my intent, by writing this letter, to protest the application by Hughes Drilling Company of Wellsville, KS to inject saltwater into the I-1, I-2, I-3, and I-4 wells in the Wendell Broers Lease in the southwest 1/4 of section 2, township 16, range 20 east of Franklin County, KS. The general API numbers of these wells are 15-059-27153, 15-059-27154, 15-059-27155, and 15-059-27156.

The following should be considered:

1. The above proposed injection sites are a watershed for Wolf Creek. The watershed flows south along Spring Creek making its way into the Marias des Cygnes river northwest of Peoria, KS.

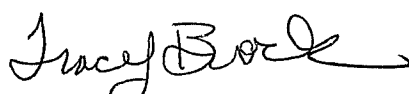
2. The proximity of these proposed injection sites raises serious questions:

a.) The condition of the well casings are connected to the age and bore practices of the spud date of the well; the wells for which application is being sought are located near the following wells: API 15-059-23895, API 15-059-23900, and API 15-059-23903. The spud dates of these wells were in 1985. The questions arise from these older spud dates and the breakdown of casings and cement barriers that have occurred over time.

b.) The KCC does not require base-line water data in the vicinity of the watershed prior to injection; specific data in concern is related to Aluminum, Arsenic, Barium, Manganese, and Chromium. There could be elements and isotopes connected to these wells and are of concern to the health of every living creature that drinks from this water source (humans, livestock, wildlife). The drilling waste transported to disposal wells has not been analyzed to even know if it is a threat. Without this type of analysis one can not just assume that there will be no negligible risk to human life as well as livestock and wildlife.

c.) The Forest Basin is one of the oldest oil and gas basins in Kansas. When you have older improperly plugged wells this brings about alarm to the integrity of otherwise impermeable geologic strata. The Kansas Corporation Commission has a record of such wells through its Abandoned Well Coordinators. If these types of wells are found to be located in the Forest City Basin these records would lend reasonable doubt as to the permitting of injection in this basin.

Sincerely,


Tracy Brock

3751 Rock Creek Terrace
Rantoul, KS 66079

Conservation Division
266 N. Main St., Ste. 220
Wichita, KS 67202-1513



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Pat Apple, Chairman
Shari Feist Albrecht, Commissioner
Jay Scott Emler, Commissioner

Sam Brownback, Governor

December 15, 2017

TRACY BROCK
3751 ROCKCREEK TERRACE
RANTOUL KS 66079

RE: Application for Injection Authority
Docket No. **E-32,585**
Hughes Oil Co.
W. Broers I-1, I-2, I-3 & I-4
Sec. 2-16S-20E
Franklin County, Kansas

Dear Ms. Brock:

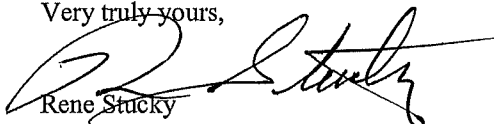
This letter acknowledges receipt of your protest/objection to the above-referenced application.

Please advise me within ten (10) days of receiving this letter if you feel a hearing should be scheduled in this matter. If a hearing is scheduled, you will be expected to participate in the hearing either in person or through legal counsel. Should you decide that you will not participate in a hearing, none will be scheduled and the application will be handled administratively and your protest will be noted. The U.S. Environmental Protection Agency (EPA) requires a hearing be held where significant interest is demonstrated. Failure to participate in the hearing process after filing a protest or objection indicates a lack of significant interest and no useful purpose would be served by holding a hearing if you, as opposing party, are not there to present testimony or cross-examine applicant's witnesses. If you are going to appear, you will receive a Notice of Hearing and should carefully comply with that Notice, including the requirement of pre-filed testimony. Any person requiring special accommodations under The Americans With Disabilities Act needs to give notice to the Commission at least ten (10) days prior to the scheduled hearing date. If you have questions regarding the hearing process, please contact Jon Meyers (316-337-6200) of our legal staff.

Commission staff has the duty to represent the public in general in recommending approval or denial of applications for injection or disposal well authority. One of the Commission's primary concerns is the protection of our groundwater and environment. If no hearing is held on this application, your objection will be taken into consideration by our staff in making a recommendation on this application. All of our staff geologists and technicians have qualified as expert witnesses and are sensitive to the concerns expressed by you and the citizens of our State.

Enclosed is a copy of the Conservation Division regulations regarding applications, hearings, and protestants. If you have any other questions, please do not hesitate to contact me.

Very truly yours,



Rene Stucky
UIC Director

cc: Hughes Oil Co.
Lesli Baker
District Office # 3
Jerry Knobel
Legal ✓
File

Enclosure