

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

IN THE MATTER OF THE APPLICATION OF	)	
DOUBLE "D" OIL COMPANY, INC. FOR AUTHORITY	)	DOCKET NO. 22-CONS- <del>3345</del> -CUIC
TO INJECT AND DISPOSE OF SALT WATER INTO	)	
THE STALNAKER FORMATION IN ITS BYERS SWD	)	CONSERVATION DIVISION
#1 WELL LOCATED IN THE E/2 NE/4 OF SECTION	)	
21, TOWNSHIP 32 SOUTH, RANGE 5 EAST, COWLEY	)	LICENSE NO. 30169
COUNTY, KANSAS	)	

PROTEST OF APPLICATION AND REQUEST FOR HEARING

COME NOW, the following persons ("Protesters"):

Garth and Amy Moon, husband and wife  
16512 141<sup>st</sup> Road  
Winfield, Kansas 67156

Roger and Allyson Moon, husband and wife  
1606 Fowler Avenue  
Winfield, Kansas 67156

George Howard Moon, a single person  
218 W. Excelsior Street  
Excelsior Springs, Missouri 64062

and pursuant to KAR 82-3-135b, submit to the State Corporation Commission (the "Commission") their protest against granting of the Application for Injection Well filed by Double "D" Oil Company, Inc. ("Applicant") on February 22, 2022 for authority to inject and dispose of salt water into the Stalnaker Formation in Applicant's Byers SWD #1 well (APi No. 15-035-24718-00-00) located in the SE/4 SW/4 NE/4 NW/4 of Section 21, Township 32 South, Range 5 East, Cowley County, Kansas.

1. Protesters are the current owners of all surface, mineral and water rights associated with land in the W/2 NW/4 and N/2 SW/4 of said Section 21, which land is within one-half (1/2) mile of the subject well, and therefore have a direct and substantial interest in this application.

2. We are formally protesting this application as we feel this could be potentially hazardous to our sole source of fresh water for our home and farm/livestock needs. We obtain 100% of our fresh water from a water well which is within 1/3 mile of the proposed SWD well site.

3. Within the afore mentioned 1/3 mile radius lies the now longtime abandoned Howard Moon #1, B Moon #2, as well as the B Moon #3 well bores, which years after they last produced, have yet to be plugged. This proposed SWD injection well is ¼ mile or less east of the B Moon #3, 1/3 mile NE of the Howard Moon #1 well, and the Moon B #2 well, all unplugged and historically with casing issues over the lifespan of said wellbores.

4. It is our concern that even if the Byers SWD #1 wellbore construction appears mechanically sound on paper, the threat to our groundwater remains, due to the potential of disposed salt water into the Stalnaker formation infiltrating groundwater via natural or man-made fractures into the various unplugged/abandoned/temporarily abandoned Moon well-bores in the immediate vicinity. The three Moon wells which Double D has operated, abandoned and remain unplugged have static fluid levels well above the Stalnaker formation. These factors call into question the location and injection strategy of the proposed SWD well.

5. In addition to the afore mentioned factors, our concern is increased by Double D Oil's failure to produce the Moon lease and sub-standard operating practices such as: 1) general disregard for upholding lease production agreements, 2) a history of ignoring generally accepted production practices, 3) general disregard for and improper practices toward maintaining leased surface ground, 4) improper practices toward maintaining quality and integrity of lease surface water causing health concerns for livestock or other native lifeforms, and 5) failure to complete installation of surface production equipment. These factors call into question the quality of the wellbore construction of the proposed Byers SWD #1.

WHEREFORE, Protesters pray that this application be set for hearing before the Commission, and upon receipt of testimony and other evidence at the hearing, that the same be denied.

Respectfully submitted,

Garth Moon 4/4/22  
Garth Moon

Amy Moon 4/4/22  
Amy Moon

for themselves and on behalf Protesters Roger and Allyson Moon, and George Howard Moon, pursuant to KAR 82-1-219(f)(1).

VERIFICATION

STATE OF KANSAS     )  
                                      ) SS:  
COUNTY OF COWLEY    )

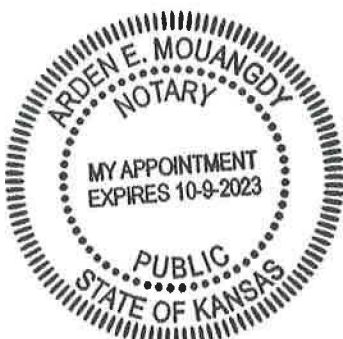
Amy Moon, of lawful age and being first duly sworn upon her oath, deposes and states: That she is one of the Protesters in the above-captioned action; that she has read the above and foregoing Protest of Application and Request for Hearing, knows and understands the contents thereof, and on behalf of all Protesters, states that the statements and allegations therein contained are true and correct according to her knowledge, information, and belief.

Amy Moon 4/4/22  
Amy Moon

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 4th day of April, 2022.

My commission expires: 10-9-23

Arden E. Mouangdy  
Notary Public



CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 4<sup>th</sup> day of April, 2022, she caused the above and foregoing Protest of Application and Request for Hearing to be filed with the State Corporation Commission, Conservation Division electronically via e-filing Express, and the original mailed via United States mail, postage prepaid, to:

Kansas Corporation Commission,  
Conservation Division  
266 N. Main Street, Suite 220  
Wichita, KS 67202-1513

with a copy mailed by United State mail, postage prepaid, to:

Double "D" Oil Company, Inc.  
2009 Jean Court  
Winfield, Kansas 67156

 4/4/22  
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Amy Moon