

November 4, 2018

Mr. Rene Stucky  
Kansas Corporation Commission  
Conservation Division  
266 N. Main Street, Suite 220  
Wichita, Kansas 87202-1513

Dear Mr. Stucky:

I am submitting this letter in protest of the issuing of a saltwater injection permit to TDR Construction, Inc. for Superior Lease well #I-1, located in the northeast  $\frac{1}{4}$  of section 10, Twp. 16S, Range 21 E of Franklin County, Kansas.

An oil and gas map from the Franklin County Cartographer office dated in the decade of 1920's plus the 2018 KCC abandoned well report to the Kansas legislature reveal there are an extraordinary large number of old oil or gas wells (approximately 15-30) within this same section or on the section line as follows:

- Within the same quarter section (northeast  $\frac{1}{4}$  of section 10, Twp. 16S, Range 21 E) are 12 old wells from the 1920's alone.
- In the NW  $\frac{1}{4}$  Sec. 10, Twp.16S, Range 21 E are 1 oil and 3 gas wells from the 1920's alone
- In the SW  $\frac{1}{4}$  Sec.10, Twp.16S, Range 21E are 5 oil and 2 gas wells from the 1920's alone
- In the SE  $\frac{1}{4}$  Sec.10, Twp.16S,Range 21E are 4 oil and 1 abandoned well as of 1920's.
- In the SE  $\frac{1}{4}$  Sec.3, Twp. 16S, Range 21E on the Sec.10-Sec.3 section line an abandoned well identified in the 1920's
- From the KCC 2018 report, there are 5 Priority 1, Level B wells in Sec.10, Twp.16S, Range 21E. Whether or not these Priority 1 wells are those already identified from the 1920's map or represent additional wells from other decades.

Please note again, these wells listed only represent those identified in the 1920's and in the KCC 2018 report. Oil and gas drilling has been continuous in this part of Franklin County in the intervening years. One has to question how many more old wells exist in this same section. The fact that there are 5 wells identified leaking on to the surface in this same section would suggest that there is already a confirmed hazard in this section that needs addressed before additional permits are issued.

My objection to continued permitting of injection wells in this area stems from the fact that these old wells are highly unlikely to have been plugged at all, let alone properly to prevent fluids and accompanying contaminants from high pressure injection from rising in the old deteriorated and porous casings and infiltrating the adjacent surface waters that flow through the watershed, supplying wells in the area as well as RWD #6. My residence is

supplied by RWD #6. On the map of Franklin County, there is a creek of fair length that flows from just south of Sec. 10, Twp.16S, Range 21E and empties into the Marais des Cygnes just upstream from the water intake points for RWD #6 near Rantoul, Ks.

Safe public water supplies are critical to the health, economic development and sustained current economic activity of all communities and inhabitants. RWD #6 is the largest water district in Franklin County, supplying multiple townships in the eastern half of Franklin County, including a school district. The value of my property is heavily dependent upon the water supplied by RWD #6. Furthermore, the income-generating events hosted at our farm, as well as the farm products we market depend upon the reputation of safe drinking water. Our laying hens, broilers and sheep all consume RWD #6 water. Saturation of surface water from high-pressure injection well fluids due to many deteriorated, unplugged and abandoned wells is a direct threat to the property values of the entire area supplied by RWD #6.

Respectfully,

Roxanne Mettenburg

1824 Nevada Rd

Princeton, Ks 66078

785-242-2156

Cc: TDR Construction, Inc.  
PO Box 339  
Louisburg, Kansas 66053