

Received  
KANSAS CORPORATION COMMISSION

**MAY 12 2020**

CONSERVATION DIVISION  
WICHITA, KS

**Jeter & Nina Isely**  
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**Kansas Corporation**  
**Conservation Division (Oil & Gas)**  
266 N. Main St., Ste. 220  
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Phone: (316) 337-6200  
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May 8, 2020

Dear Sir/Madam:

We are writing with respect to Murfin Drilling Co., Inc. application for a permit to authorize the disposal of saltwater into the Mississippi formation at the Culwell 'J' #2-19, located in NE/4 Sec. 19, Township 2S, Range 37W, Cheyenne County, Kansas, (maximum operating pressure of 1000 psi and maximum rate of 3000 barrels per day).

We have concerns in permitting as saltwater disposal poses a threat to usable, quality groundwater. Our concerns centers on the grounds that permitting the saltwater disposal can cause an increase in seismic activity and poses a danger to the health, safety, and welfare of the public.

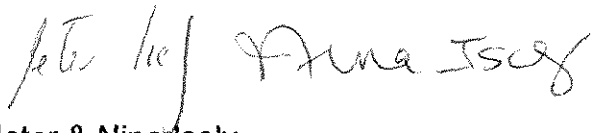
We see the permitting the application as written for saltwater disposal as posing a potential threat to usable, quality groundwater. We are concerned about what other contaminants may be in the saltwater disposal. We are also concerned about what efforts Murfin Drilling Co., Inc. has taken to ensure the fluids injected into the disposal will be isolated from the surrounding groundwater. What we would like to see is an offsetting fresh-water inflow into the drainage basin that would wash away any minor salt-water outflow.

We are also concerned because permitting the application for saltwater disposal can cause an increase in seismic activity, which poses a danger to the health, safety, and welfare of people in Cheyenne County, Kansas. The number of small to moderate-sized earthquakes in much of the central and eastern United States began to increase markedly around 2009. Some of this seismicity appears to be associated with increases in saltwater injection and the consensus within the scientific community is that the recent increase in seismicity is generally related to increases in the disposal of saltwater produced along with oil and gas.

We would like to see the permit include mitigating factors such as restricting saltwater disposal has been effective in other areas of Kansas at reducing seismic activity should there be an increase in such activity. This would put in place the structure outlined in Docket No. 15-CONS-770-CMSC, where the Kansas Corporation Commission restricted saltwater injection rates in Harper and Sumner Counties due to an increase in seismic activity that posed an immediate danger to the health, safety, and welfare of public. Since the implementation of the order, seismic activity is trending downward in the area. While we understand the results are not conclusive, they are encouraging evidence that by continuing to restrict saltwater injection the Kansas Corporation Commission can further reduce the seismic activity that is endangering the public.

Thank you for your consideration.

Sincerely,



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