

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

BEFORE COMMISSIONERS: Shari Feist Albrecht, Chair
 Jay Scott Emler, Commissioner
 Dwight Keen, Commissioner

In the Matter of the Application of RJM)	Docket No. 18-CONS-3305-CUIC
Company for a Permit to Authorize the)	
Disposal of Saltwater Into the Doll #3)	CONSERVATION DIVISION
Well, located in the SW/4 of Section 27,)	
Township 18 South, Range 11 West,)	License No. 30458
Barton County, Kansas)	

**APPLICANT'S RESPONSE TO PROTESTANT CINDY HOEDEL'S
OBJECTION TO NOTICE BY APPLICANT**

COMES NOW, the Applicant, RJM Company, and, in response to protestant Cindy Hoedel's Objection to Notice by Applicant, states as follows:

1. On July 2, 2018, protestant Cindy Hoedel filed a document entitled "Objection to Notice by Applicant" in this docket.
2. The basis for Ms. Hoedel's Objection appears to be a claim that Applicant's published notice of its Application was materially misleading. That is, Ms. Hoedel appears to claim the notice does not accurately describe the application.
3. Applicant denies that its Notice was materially misleading. The Notice states Applicant has "filed an application to commence the injection of saltwater into the Lansing-Kansas City formation at the Doll Lease Well No. 3." *See* Exhibit A. The statement in the "re" line at the top of the Notice, which describes the application as one "for a permit to authorize the enhanced recovery of saltwater into the Doll Lease Well No. 3," while not as clearly stated, still indicates Applicant is seeking permission to utilize saltwater in the Doll well.

4. The application filed by Applicant is for an injection well. The authority requested by Applicant from the Commission and the description of such authority in Applicant's Notice are consistent and the Notice is not, as Ms. Hoedel claims, materially misleading or defective.

5. Further, all of the protests filed in this matter clearly indicate an understanding of the nature of the authority requested by Applicant, despite the fact that the protestants do not have standing to protest Applicant's request for such authority.¹

WHEREFORE, Applicant respectfully requests that Protestant Cindy Hoedel's Objection to Notice by Applicant and request to dismiss this docket be denied, and for such other and further relief as the Commission deems just and equitable.

Respectfully submitted:

TRIPLETT WOOLF GARRETSON, LLC

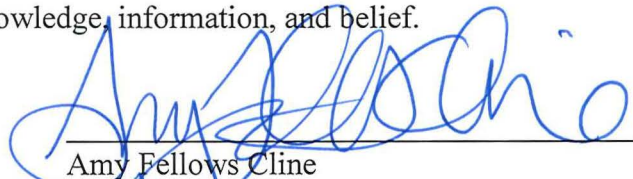
By /s/ Amy Fellows Cline
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Attorneys for RJM Company

¹ See Applicants' Motion to Dismiss, filed June 1, 2018.

VERIFICATION

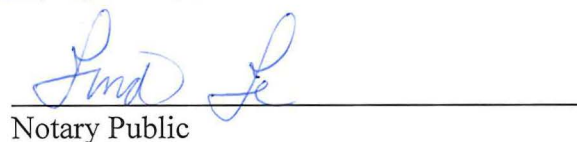
STATE OF KANSAS)
) ss
COUNTY OF SEDGWICK)

Amy Fellows Cline, being first duly sworn upon her oath, deposes and states that she is Counsel for RJM Company, that she has read and is familiar with the foregoing, and that the statements therein are true to the best of her knowledge, information, and belief.



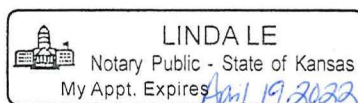
Amy Fellows Cline

Submitted and sworn to before me on this 2nd day of July, 2018.



Notary Public

My Commission Expires: April 19, 2022



CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2018, the above **Applicant's Response to Protestant Cindy Hoedel's Objection to Notice by Applicant** was sent via USPS, postage prepaid, or electronic mail, addressed to the following:

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/s/ Amy Fellows Cline
Amy Fellows Cline, #19995

STATE OF KANSAS

BARTON
COUNTY

Proof of Publication

SS.

MARY HOISINGTON

of lawful age, duly sworn upon oath states that SHE
is the PUBLISHER

of THE GREAT BEND TRIBUNE

THAT said newspaper has been published at least weekly fifty (50) times a year and has been so published for at least five years prior to the first publication of the attached notice:

THAT said paper was entered as second class mail matter at the post office of its publication:

THAT said paper has a general paid circulation on a daily, or weekly, or monthly, or yearly basis in

BARTON County, Kansas, and is

NOT a trade, religious or fraternal publication and has been PRINTED and published in BARTON County, Kansas.

That the attached notice was published in a regular issue of said newspaper for 1 consecutive weeks, the first publication being on the 14th day of January 20 18 and the last publication on the 14th day of January 20 18

Publication Fee \$ _____
Affidavit, Notary's Fees \$ _____
Additional Copies _____ at _____ \$ _____
Total Publication Fee \$ 35.48

(Sign)

Witness my hand this 14th day of January, 20 18

SUBSCRIBED and Sworn to before me this 14th

day of January 20 18

(Notary Public)

State of Kansas - Notary Public
Loretta Harmison

My Commission Expires 9-8-18

My commission expires _____

(First published in the Great Bend Tribune on January 14, 2018)
BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS
NOTICE OF FILING APPLICATION
RE: RJM Company Application for a permit to authorize the enhanced recovery of saltwater into the Doli Lease Well No. 3 located in Barton County, Kansas.
TO: All Oil and Gas Producers, Unleased Mineral Interest Owners, Landowners, and all persons who have an interest in the land.
You and each of you are hereby notified that RJM Company has filed an application to commence the injection of saltwater into the Doli Lease Well No. 3 located in the SW 1/4 of the Sec. 27, Twp. 18S, R. 11W, Barton County, Kansas with a maximum operating pressure of 1500 psig and a maximum injection rate of 7500 bbls per day.
Any persons who object to or protest this application shall be required to file their objections or protest with the Conservation Division of the State Corporation Commission of the State of Kansas within three days from the date of this publication. These protests shall be filed pursuant to Commission regulations and must state specific reasons why the grant of the application may cause waste, violate correlative rights, or pollute the natural resources of the State of Kansas.
All persons interested or concerned shall take note of the foregoing and shall govern themselves accordingly.
RJM Company
P.O. Box 258
Clifton, KS 67525

Received
KANSAS CORPORATION COMMISSION

JAN 31 2018

CONSERVATION DIVISION
WICHITA, KS

