

Flint Hills Land & Cattle Co
201 MAIN STREET, SUITE 3100
FORT WORTH, TEXAS 76102
(817) 390-8400

Received
KANSAS CORPORATION COMMISSION

MAY 23 2019

CONSERVATION DIVISION
WICHITA, KS

19-CONS-3393-CUIC

May 17, 2019

District Director
Kansas Corporation Commission, Conservation Division (Oil & Gas)
3450 N. Rock Road
Building 600, Suite 601
Wichita, KS 67226

Re: **Notice of Protest** for Application for Injection Well (Form U-1) for the Drumm Lease (Drumm 23, Drumm 2) and Saco-Drumm Lease (Saco Drumm 4) by Jim Snyder Inc., Butler County, KS

Director:

Flint Hills Land & Cattle Co. is entering this **Notice of Protest** to the request by Jim Snyder Inc. for authorization to convert three temporarily abandoned wells to injection wells on the Drumm Lease (Drumm 23, Drumm 2) and Saco-Drumm Lease (Saco Drumm 4) in Butler County, Kansas.

As surface owners, Flint Hills Land & Cattle Co. has maintained a professional working relationship with the numerous oil & gas operators at our various ranch properties including the Wiedemann Ranch. In virtually all instances, we have reached out to producers if we see problems while we carry out ranch operations. We have also made efforts to request clean-ups of abandoned locations or sites with historical releases, which have not been productive. Therefore, in the case of this application request, Flint Hills Land & Cattle Co. must protest this application for injection based on the following:

- Flint Hills Land & Cattle Co. did not receive notice of the application until May 15, 2015, which was over 25 days from the date it was published in the Butler County Times (April 19, 2018). This should have been done before the application was submitted, which was notarized on May 3, 2019. This is a violation K.A.R. 83-3-135a (c); and
- The oil and gas operations on the Drumm lease is evidenced by areas of extensive produced water (chloride) contamination at existing tank batteries and wells, aging and dilapidated infrastructure (e.g., electrical line hanging to ground or low enough to possibly interfere with cattle operations, containments in need of repair, leaking wells, and out of service equipment and/or piping etc.). In general, Flint Hills Land & Cattle feels that this constitutes a rights violation of current surface soil conditions and adhering to compliance requirements.

As mentioned in the opening paragraph, Flint Hills Land & Cattle Co. has worked with numerous oil & gas operators for many years. However, in this case, based on historical operations and conditions of the Drumm Lease areas, we are not only concerned of the current conditions, damages, and questionable operating and equipment maintenance practices but the potential risk for further

environmental impact to ranch surface soils and surface drainage-ways, in addition to a potential risk to livestock. We request that before this authorization be given, that the KCC visit and review the current conditions and surface impact on the lease. Flint Hills Land & Cattle Co. asks that the KCC-Conservation Division (Oil & Gas) consider this written protest.

Sincerely,

Handwritten signature of R.D. Farr in black ink.

R.D. Farr
Flint Hills Land & Cattle Co.

Handwritten signature of J. William Biehl in black ink.

J. William Biehl, PG
Flint Hills Land & Cattle Co.

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