BEFORE THE CORPORATION COMMISSION OF THE STATE OF KANSAS

)

)

)

)

IN THE MATTER OF THE APPLICATION OF PALOMINO PETROLEUM, INC., FOR A LOCATION EXCEPTION FOR ITS SPECTRE #1 WELL LOCATED IN THE NW/4 NW/4 OF SECTION 17-T18S-R24W, NESS COUNTY, KANSAS. DOCKET NO. 21-CONS-3127-CWLE LICENSE NO. 30742

CONSERVATION DIVISION

MOTION TO AMEND APPLICATION AND FOR SUMMARY PROCEEDINGS

1. Applicant, Palomino Petroleum, Inc. ("Palomino") filed this Application for a location exception to drill its Spectre #1 well at a location 268 feet from the North line and 178 feet from the West line of said Section 17, which are the nearest lease lines to the intended location.

2. Thereafter, Pickrell Drilling Company, Inc. ("Pickrell") and Norstar Petroleum, Inc. ("Norstar") intervened and filed a protest to the Application.

3. In discussions with both Pickrell and Norstar, Palomino has reached an agreement whereby Palomino will limit the allowable for the Spectre #1 well to a maximum of 58 bbl/day as provided by K.A.R. 82-3-108(c), 82-3-203(a) and 82-3-207. Accordingly, Palomino files this Motion to Amend paragraph 10 of its original Application to state that it will accept a maximum allowable of 58 bbl/day for the Spectre #1 well rather than be granted a full and unreduced allowable 200 bbl/day.

4. Palomino also requests that its Amended Application be approve pursuant to summary proceedings.

Respectfully submitted,

/s/ Steven D. Gough Steven D. Gough WITHERS GOUGH PIKE & PFAFF LLC O.W. Garvey Building 200 W. Douglas, Suite 1010 Wichita, KS 67202 316-266-5021 (direct line) sgough@withersgough.com Attorneys for Applicant

STATE OF KANSAS SS. **COUNTY OF SEDGWICK }**

Steven D. Gough, of lawful age, and being first duly sworn upon oath, deposes and says: that he is an attorney for Palomino Petroleum, Inc., that he has read the within and foregoing, and the contents thereof are true to the best of his knowledge and belief.

By: Steven D. Gough

Subscribed and sworn to before me this 23rd day of March 2021.



Jotary Public

My Commission Expires: December 12

CERTIFICATE OF SERVICE

On March 23, 2021 I certify that service of this document was accomplished by electronic transmission to the parties and attorneys who are listed on the Service List for DOCKET NO. 21-CONS-3127-CWLE.

/s/ Steven D. Gough

JAKE EASTES, GEOLOGIST SPECIALIST KANSAS CORPORATION COMMISSION 266 N. Main St., Ste. 220 WICHITA, KS 67202-1513 j.eastes@kcc.ks.gov

KELCEY MARSH, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION CENTRAL OFFICE 266 N. MAIN ST, STE 220 WICHITA, KS 67202-1513 k.marsh@kcc.ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL KANSAS CORPORATION COMMISSION 266 N. Main St., Ste. 220 WICHITA, KS 67202-1513 j.myers@kcc.ks.gov

JEFF KENNEDY MARTIN, PRINGLE, OLIVER, WALLACE & BAUER, LLP 645 E. DOUGLAS STE 100 WICHITA, KS 67202 jkennedy@martinpringle.com

Even 2. Jong

Steven D. Gough