

18-CONS-3251-CUIC

**QUINQUE OPERATING COMPANY**

908 N.W. 71<sup>st</sup> Street  
Oklahoma City, OK 73116

2017-12-13 16:28:26  
Kansas Corporation Commission  
/s/ Lynn M. Retz

Telephone: (405) 840-9876

Telefacsimile: (405) 840-2011

November 27, 2017

Kansas Corporation Commission  
Oil and Gas Conservation Division  
266 N. Main Street, Suite 220  
Wichita, KS 67202-1513

**KCC WICHITA**

**NOV 30 2017**

**RECEIVED**

RE: American Warrior, Inc. Application for Injection Well – Blaesie #10-6 SWD  
API 15-199-20445 Southeast Quarter (SE/4) of Section 6-15S-41W  
Wallace County, KS

Dear Sirs:

Quinque Operating Company ("Quinque") hereby objects to and protests the granting of the referenced application for injection well. In support of this objection and protest, Quinque states as follows:

1. Quinque is the operator of the Great Bend Trust #1, which is located in the Northeast Quarter (NE/4) of Section 7-15S-41W. The Great Bend Trust #1 lease is directly south of the proposed Blaesie #10-6 SWD injector.
2. The Great Bend Trust #1 produces from the Morrow formation.
3. The Application does not attach any electric log which is a predicate for filing the same with the Kansas Corporation Commission. The Application proposes for American Warrior, Inc. to inject into the Morrow formation. Quinque requested the applicant to provide it with a photocopy of the electric log taken from the Blaesie #10-6 SWD wellbore so that the correlative Morrow formation in which the applicant proposes to inject can be evaluated for purpose of protecting Quinque's correlative rights and production from that formation.
4. The applicant has failed to provide Quinque with any information or the electric log for the Blaesie #10-6 SWD.
5. Water injected into the Morrow formation within the Blaesie #10-6 SWD could migrate into the Northeast Quarter (NE/4) of Section 7-15S-41W and substantially inhibit the recovery of commercial reserves from the Morrow formation within the Quinque Great Bend Trust #1 and lease, all to the substantial damage of Quinque.

Quinque Operating Company respectfully requests the Kansas Corporation Commission to deny the Application for Injection Well.

Sincerely yours,



Steven J. Goetzinger

cc: American Warrior, Inc.

Conservation Division  
266 N. Main St., Ste. 220  
Wichita, KS 67202-1513



Phone: 316-337-6200  
Fax: 316-337-6211  
<http://kcc.ks.gov/>

Pat Apple, Chairman  
Shari Feist Albrecht, Commissioner  
Jay Scott Emler, Commissioner

Sam Brownback, Governor

December 4, 2017

STEVEN J GOETZINGER  
QUINQUE OPERATING COMPANY  
908 N W 71<sup>ST</sup> STREET  
OKLAHOMA CITY OK 73116

**RE:** Application for Injection Authority  
Docket No. E-32,576  
American Warrior, Inc.  
Blaesi #10-6  
Sec. 06-15S-41W  
Wallace County, Kansas

Dear Mr. Goetzinger:

This letter acknowledges receipt of your protest/objection to the above-referenced application.

Please advise me within ten (10) days of receiving this letter if you feel a hearing should be scheduled in this matter. If a hearing is scheduled, you will be expected to participate in the hearing either in person or through legal counsel. Should you decide that you will not participate in a hearing, none will be scheduled and the application will be handled administratively and your protest will be noted. The U.S. Environmental Protection Agency (EPA) requires a hearing be held where significant interest is demonstrated. Failure to participate in the hearing process after filing a protest or objection indicates a lack of significant interest and no useful purpose would be served by holding a hearing if you, as opposing party, are not there to present testimony or cross-examine applicant's witnesses. If you are going to appear, you will receive a Notice of Hearing and should carefully comply with that Notice, including the requirement of pre-filed testimony. Any person requiring special accommodations under The Americans With Disabilities Act needs to give notice to the Commission at least ten (10) days prior to the scheduled hearing date. If you have questions regarding the hearing process, please contact Jon Meyers (316-337-6200) of our legal staff.

Commission staff has the duty to represent the public in general in recommending approval or denial of applications for injection or disposal well authority. One of the Commission's primary concerns is the protection of our groundwater and environment. If no hearing is held on this application, your objection will be taken into consideration by our staff in making a recommendation on this application. All of our staff geologists and technicians have qualified as expert witnesses and are sensitive to the concerns expressed by you and the citizens of our State.

Enclosed is a copy of the Conservation Division regulations regarding applications, hearings, and protestants. If you have any other questions, please do not hesitate to contact me.

Very truly yours,

  
Rene Stucky  
UIC Director

cc: American Warrior, Inc.  
District Office # 4  
Jerry Knobel  
Legal  
File ✓

Enclosure