BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

MAR 1 8 2009

In the Matter of the Application)	Julia	a Talyfy
Of Wheatland Electric Cooperative, Inc.)	Docket No. 09-WHLE-681-RTS	
For Approval to Make Certain Changes)		
In Their Charges for Electric Service)		

PETITION TO INTERVENE OF PETROSANTANDER (USA) INC.

COMES NOW PetroSantander (USA) Inc., ("PetroSantander") by and through its attorney, Rachel Lipman Reiber, and hereby requests that it be permitted to intervene in the above-captioned matter as contemplated by K.A.R. 82-1-225. In support of its Petition, PetroSantander states the following:

- 1. On March 2, 2009, Wheatland Electric Cooperative, Inc. ("Wheatland") filed an Application for approval to Make Certain Changes in Their Charges for Electric Service.
- 2. PetroSantander is a Delaware Corporation that is registered with the Kansas Secretary of State's office, and is a corporation in good standing. PetroSantander is licensed and bonded as an oil and gas well operator with the Commission, operator license number 32198.
- 3. PetroSantander operates numerous leases within Wheatland's service territory utilizing secondary recovery techniques, primarily waterflood operations to repressure existing oil reservoirs to sweep oil that otherwise would not be economically recoverable under primary methods. These waterflood projects require electricity to produce and inject water into the subsurface and then to recover the oil and water mixture from the oil reservoir.
- 4. As a ratepayer of Wheatland Electric Cooperative, PetroSantander's electric bill currently averages approximately \$70,000 per month. (copy attached).
- 5. The changes outlined in its filing, if approved by the Commission, will result in a significant increase to PetroSantander's electric bills and consequently operating costs of

PetroSantander, which could render their secondary recovery efforts uneconomic. If forced to abandon its secondary recovery operations, some or all of these oil leases would be abandoned, resulting in waste, which the Commission has a statutory mandate to prevent, whenever possible. K.S.A. 55-601; 55-602; 55-701; 55-702.

- 6. PetroSantander has a significant interest in assuring that any rate increases allowed Wheatland are thoroughly justified and that they do not result in an unfair burden on any of Wheatland's customers, including PetroSantander. No other party can adequately represent its interests.
- 7. The Commission recently addressed its broad discretion to grant a petition for intervention in Docket No. 08-WSEE-1041-RTS, citing K.S.A. 77-521(a)(3) and K.A.R. 82-1-225, concluded that intervention is appropriate if it is in the interest of justice, if the intervention will not impair the orderly and prompt conduct of the proceedings, and if the party has stated facts demonstrating its legal rights, duties, privileges, immunities or other legal interests may be substantially affected by the proceeding.
- 8. Accordingly PetroSantander requests that its counsel be added to the service list for all pleadings, communications and correspondence:

Rachel Lipman Reiber Martin Pringle Oliver Wallace & Bauer LLP 6900 College Blvd., Suite 700 Overland Park, KS 66211 (913) 491-5500 telephone (913) 491-3341 facsimile

WHEREFORE, for the reasons stated above, PetroSantander respectfully requests its Petition to Intervene be granted.

KC069852.DOC 2

Respectfully submitted,

Rachel Lipman Reiber, KS Bar #12164

Martin Pringle Oliver Wallace & Bauer LLP

6900 College Blvd., Suite 700

Overland Park, KS 66211

(913) 491-5500 telephone

(913) 491-3341 facsimile

Counsel for PetroSantander(USA), Inc.

VERIFICATION

STATE OF TEXAS)
COUNTY OF HAZELS)
William Aspinwall, land manager of PetroSantander (USA) Inc. being of lawful age, being duly sworn, deposes and states that he has read the foregoing PETITION TO INTERVENE OF PETROSANTANDER (USA) INC., and knows the contents thereof, and that the matters and information therein stated are true to the best of his knowledge and belief. William Aspinwall
Subscribed and sworn to before me this 13 day of MMM, 2009 Notary Public
My appointment expires: WYI 5, 2009 CHRISTINA RIVAS Notary Public, State of Texas My Commission Expires April D5, 2009

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of March, 2009, a true and correct copy of the above and foregoing PETITION TO INTERVENE OF PETROSANTANDER (USA) INC. was filed via U.S. Mail, postage prepaid and properly addressed to:

Terri Pemberton, Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604-4027

Matthew Spurgin, Litigation Counsel Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, KS 66604-4027

Richard Macke, Leader, Rates & Financial Planning Power System Engineering, Inc. 12301 Central Avenue NE Blaine, MN 55434

Rachel Sypmen Rut
Rachel Lipman Reiber



Acount Number	10009935
mount Due	67163.32
Date Payable	10/27/08
Delinquent After	11/17/08

PR 081007

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PETROSANTANDER INC
11130 E 7 MILE RD
GARDEN CITY KS F678466

WHEATLAND ELECTRIC COOPERATIVE 2005 WEST FULTON

BOX 973

GARDEN CITY, KS 67846-0973

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OCT 2 8 2008

	SUMMARY BILLING						
SUB. ACCT.	METER NUMBER	DATE READ	DAYS	KWH USED	KW USED	LOCATION	TOTAL BILLING
5	32548	10/06	27	63	1.00		-1 7.55
5	32548	10/06	27	63	1.00	(MCFARREN #3) //24 OTHER CHARGES	.09
6	33031	10/06	26	76400	129.00	/	- 4733.68
6	33031	10/06	26	76400	129.00	OTHER CHARGES 284.03	113.68
7	50516	10/06	26	25440	45.00	562772 8% (SCOTT 4-3) /037 /53.55	- 1919.37
7	50516	10/06	26	25440	45.00	OTHER CHARGES	37.85
8	30302	10/06	26	80	.00	562774 (SCOTT 4:5)	77.12
8	30302	10/06	26	80	.00		.12
9	30309	10/06	26	760	4.00	562776 (BECKER 5-1)/003	-% 1.21
9	30309	10/06	26	760	4.00	OTHER CHARGES	1.13
10	33033	10/06	26	11120	24.00	562778 (SHERMAN #2)	907.51
10	33033	10/06	26	11120	24.00	OTHER CHARGES	16.55
11	30280	10/06	26	24320	45.00	562780 (SHERMAN #4)	1776.75
11	30280	10/06	26	24320	45.00		36.19
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Scott City Office	872-5885		
Leoti Office	375-2632		
Tribune Office	376-4231		
Syracuse Office	384-5171		
Garden City Office	275-0261		
Great Bend Office	793-4223		
Harper Office	896-7090		



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PETROSANTANDER INC 11130 E 7 MILE RD GARDEN CITY KS 67846

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WHEATLAND ELECTRIC COOPERATIVE 2005 WEST FULTON BOX 973 GARDEN CITY, KS 67846-0973

Tear at perforation and return this portion with payment.

	SUMMARY BILLING						
SUB. ACCT.	METER NUMBER	DATE READ	DAYS	KWH USED	KW USED	LOCATION	TOTAL BILLING
12	30304	10/06	26	12720	31.00	562782	1030.69
12	30304	10/06	26	12720	31.00	(SHERMAN #1) OTHER CHARGES	18.93
13	33035	10/06	26	7360	40.00	562784 (MACKEY #4)	823.83
13	33035	10/06	26	7360	40.00	OTHER CHARGES	10.95
14	63414	10/06	26	80	.00	562786 (MACKEY #1)	77.12
14	63414	10/06	26	80	.00	I '	.12
15	63395	10/06	26	9440	16.00	562788 (HAAG EST 4)	775.57
15	63395	10/06	26	9440	16.00	OTUTO CUNDETO	14.05
16	58723	10/06	26	43200	78.00	562789 11% 389.16 (BULGER) 7-11	-3 537.86
16	58723	10/06	26	43200	78.00		64.28
17	30279	10/06	26	17040	28.00	562790 (HAAG EST 5)	1275.68
17	30279	10/06	26	17040	28.00	OTHER CHARGES	25.36
18	55982	10/06	26	40	.00	562794 (HAAG EST. 3)	77.06
18	55982	10/06	26	40	.00	OTHER CHARGES	.06
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Scott City Office	872-5885				
Leoti Office	375-2632				
Tribune Office	376-4231			•	
Syracuse Office	384-5171				
Garden City Office	275-0261				
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WHEATLAND ELECTRIC COOPERATIVE 2005 WEST FULTON BOX 973 GARDEN CITY, KS 67846-0973

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	SUMMARY BILLING						
SUB. ACCT.	METER NUMBER	DATE READ	DAYS	KWH USED	KW USED	LOCATION	TOTAL BILLING
19	33028	10/06	26	0	.00	562825 (SHERMAN 3-5)	60.00
20	30611	10/06	26	160	.00	562827 (MEYERS10-3&SHER3-8)	77.24
20	30611	10/06	26	160	.00	OTHER CHARGES	.24
21	30283	10/06	26	20560	53.00	562832 (SHERMAN 3-6)	1611.07
21	30283	10/06	26	20560	53.00	OTHER CHARGES	30.59
22	33036	10/06		13920	143.00	562835 (SHERMAN 3-9)	2091.11
22		10/06			143.00	OTHER CHARGES	20.71
23		10/06		80	.00	562837 (MEYERS 10-1)	77.12
23		10/06		80	.00	OTHER CHARGES	.12
24	33032	10/06				562841 /7% //4/.49 (MEYER 10-4)/06 / OTHER CHARGES	 6714.63
24	33032	10/06					155.23
25		10/06		-		562842 (NELSON 2-1)	1096.87
25	33024	10/06	26	15480	29.00	OTHER CHARGES	23.03
							CONTINUED

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Scott City Office	872-5885			
Leoti Office	375-2632			
Tribune Office	376-4231			
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PETROSANTANDER INC 11130 E 7 MILE RD GARDEN CITY KS 67846

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WHEATLAND ELECTRIC COOPERATIVE 2005 WEST FULTON BOX 973 GARDEN CITY, KS 67846-0973

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					SUMMARY	BILLING	
SUB. ACCT.	METER NUMBER	DATE READ	DAYS	KWH USED	KW USED	LOCATION	TOTAL BILLING
26	33037	10/06	26	217600	372.00	1	13691.79
26	33037	10/06	26	217600	372.00	(STEWART) OTHER CHARGES	323.79
29	33026	10/06	26	40	.00	562838	152.38
29	33026	10/06	26	40	.00	OIL WELL (NELSON 2-3) OTHER CHARGES	.06
30	63352	10/06	26	5480	12.00	562839	523.99
30	63352	10/06	26	5480	12.00	OIL WELL (SHERMAN 3-2) OTHER CHARGES	8.15
31	35683	10/06	26	29640	60.00	562836 /082] ,	2522.84
31	35683	10/06	26	29640	60.00	562836 1082 Sharman Augus MEYER 10-5 Sharman Augus OTHER CHARGES	44.10
32	33030	10/06	26	160	.00	562771	77.24
32	33030	10/06	26	160	.00	OIL WELL - PAULS 9-5 OTHER CHARGES	.24
34	33025	10/06	26	80	.00	562779	154.76
34	33025	10/06	26	80	.00	CARR 2-1 SE-2-23-31 OTHER CHARGES	.12
35	33029	10/06	26	7680	14.00	562773	662.87
35	33029	10/06	26	7680	14.00	SCOTT 4-7 NE-9-23-31 OTHER CHARGES	11.43
							CONTINUED

Scott City Office	872-5885
Leoti Office	375-2632
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PETROSANTANDER INC 11130 E 7 MILE RD GARDEN CITY KS 67846

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WHEATLAND ELECTRIC COOPERATIVE 2005 WEST FULTON BOX 973 GARDEN CITY, KS 67846-0973

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	SUMMARY BILLING							
SUB. ACCT.	METER NUMBER	DATE READ	DAYS	KWH USED	KW USED	LOCATION	TOTAL BILLING	
36	27404	10/06	26	0	.00	562860 (CAMPBELL #1)	12.00	
37	34120	10/06	26	9408	23.00	562851 //°/° /646 £ 948 WATER WELL SHERMAN #5 948	861.97	
37	34120	10/06	26	9408	23.00	OTHER CHARGES	14.00	
38	35.608	10/06	26	720	6.00	562763 /080 HARRINGTON-SCOTT #1 & #2	116.07	
38	35608	10/06	26	720	6.00		1.07	
39	35610	10/06	27	21880	36.00	560332 MCFARREN #7 /127	_ 1595.60	
39	35610	10/06	27	21880	36.00	OTHER CHARGES	32.56	
40	35816	10/06	26	400	3.00	562846 ALLEY LEASE /077	_59.03	
40	35816	10/06	26	400	3.00	OTHER CHARGES	.60	
41	36340	10/06	27	69312	127.00	560323 MCFARRON OIL LEASES / 12)	- 5699.41	
41	36340	10/06	27	69312	127.00	OTHER CHARGES	103.14	
43	50668	10/07	28	255	3.00	560274 //2/ SHOP	— 51.69	
43	50668	10/07	28	255	3.00		.38	
44	55831	10/06	26	480	3.00	562735 1093 TREKELL 6-1 SE 6-23-31	65.27	
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Scott City Office	872-5885				
Leoti Office	375-2632				i
Tribune Office	376-4231				
Syracuse Office	384-5171			÷	
Garden City Office	275-0261				
Great Bend Office	793-4223				ŀ
Harper Office	896-7090				



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	·				SUMMARY	BILLING	
SUB. ACCT.	METER NUMBER	DATE READ	DAYS	KWH USED	KW USED	LOCATION	TOTAL BILLING
44	55831	10/06	26	480	3.00	OTHER CHARGES	.71
45	58030	10/06	26	680	3.00	562852 / 93 JONES TRUST SW 10-23-31	8 0.91
45	58030	10/06	26	680	3.00		1.01
46	59715	10/06	32	2410	13.00	548593 SHOP ///4	_303.99
46	59715	10/06	32	2410	13.00		3.59
47	-62060	10/06	32	87936	120.00	548590 /// CHRISTABELLE OIL FIELD	_6547.97
47	62060	10/06	32	87936	120.00	OTHER CHARGES	130.85
48.	62062	10/06	32	15840	44.00	 548591 /// CHRISTABELLOE OIL FIELD	-1 688.37
48	62062	10/06	32	15840	44.00	OTHER CHARGES	23.57
49	62061	10/06	32	40992	60.00	548592 /// 4 CHRISTABELLE OIL FEILD	-2985.64
49	62061	10/06	32	40992	60.00	OTHER CHARGES	61.00
50	62264	10/06	26	0	.00	562853 /// U OFFICE	→ 55.23
51	58069	10/06	32	4000	14.00	548594 /509 CMU FOSTER #1-18	_415.26
51	58069	10/06	32	4000	14.00	OTHER CHARGES	5.95
							CONTINUED

Scott City Office	872-5885
Leoti Office	375-2632
Tribune Office	376-4231
Syracuse Office	384-5171
Garden City Office	275-0261
Great Bend Office	793-4223
Harper Office	896-7090

, SUMMARY BILLING								
SUB. ACCT.	METER NUMBER	DATE READ	DAYS		H USED	KW USED	LOC ON	TOTAL BILL
							TOTAL DUE DUE AFTER 11/17/08	67163. 68496.2
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							SWF 1001	40/18/9000
							k with your neighbors. If you are still out of	

office during normal office hours at the following numbers or after hours at 1-800 ON AGAIN (1-800-662-4246).

**************************************	Scott City Office Leoti Office Pribune Office Vyracuse Office Varden City Office Preat Bend Office arper Office	872-5885 375-2632 376-4231 384-5171 275-0261 793-4223 896-7090	Wheatland Electric has implemented a Property Tax Surcharge pursuant to KCC authorization. More information will be included in next month's billing.
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A count Numb	er	Meter Number	Date Payable	Phone Number	
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1000 Jame	- lame				
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Account Location Activity Since Las	t Bill	\$ Amount	Current 1	Bill Information	\$ Amo
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	Rate Multi		L 11	TOTAL DUE	74.90
Billing Period Dates 09/1800 1 0/1				Cost per Day	2.50
0.77 1.00	R	Delinquent After	11/17/08	Delinquent Total	76.40
Bill Type					70.40
Present Reading			Wheatland El	lectric has imple	mantad a
Previous Reading		0	Property Tax	k Surcharge pursu	mented a
KWH Used This Period		0	authorizatio	on. More informat	in will to
KWH Used 1 Year Ago	620-872-5885		included in	next month's bil	TOU WITT DE
Scott City Office	620-375-2632			HONG MOHOH B DIT	TT119.
Leon Onice	620-376-4231				
House Office	620-384-5171				
SVINCUSE DILICE	620-275-0261				
	620-896-7090				
	620-793-4223				
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- REGULAR	F - FINAL
- ESTIMATED	I - INACTIVE WITH BALANCE
- METER CHANGE	S - SECURITY LIGHT

RATES	
1 - RESIDENTIAL 2 - GEN. SERVICE 3 - GEN. SERVICE LARGE	4 - IRRIGATION 5, 6, 7, - MUNICIPAL 8 - LARGE POWER

PETROSANTANDER (USA) INC.

6363 WOODWAY, SUITE 350 HOUSTON, TX 77057-1798 (713) 784-8700

COMPASS BANK 35-1054-1130

11/13/2008

PAY TO THE

ORDER OF

WHEATLAND ELECTRIC COOPERATIVE INC.

67,238.22

Sixty Seven Thousand Two Hundred Thirty Eight and 22/100

DOLLARS

WHEATLAND ELECTRIC COOPERATIVE INC.

Security features. Details on back.

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P.O. Box 230

Scott City KS, 67871

MEMO

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"O 10653" "1113010547"

38514318#

ETROSANTANDER (USA) INC.

10653

Invoice Date

Invoice Number

Invoice Amount

Amount Paid

AUTHORIZED SIGNATURE

10/27/2008 10/27/2008 102708 102708A

74.90

74.90

67,163.32 67,163.32

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