

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of a General Investigation to) Docket No. 18-CONS-3224-CINV
Examine the Legal Issues Pertaining to the)
Notice Requirements for Applications, Filed)
Between October 2008 and the Present,)
Seeking Underground Injection of Salt Water)
Pursuant to K.A.R. 82-3-402.) CONSERVATION DIVISION

PETITION TO INTERVENE

Keith A. Brock, Anderson & Byrd, LLP, petitions the Commission, pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, for an order permitting the Eastern Kansas Oil & Gas Association ("EKOGA") to intervene in the captioned matter. In support of this petition, EKOGA states:

1. EKOGA is an organization that has been in existence since 1957 to promote the responsible development of oil and gas resources in Eastern Kansas.
2. EKOGA has approximately 300 members, EKOGA collects and disseminates information to its members regarding oil and gas development issues impacting operations in Eastern Kansas.
3. EKOGA is an active member of the Kansas Advisory Committee on Regulation of Oil and Gas Activities, which was formed pursuant to K.S.A. 55-153. As a statutorily designated member of such Committee, EKOGA has a duty to provide input and guidance to the Kansas Corporation Commission regarding its rules, regulations and prescribed processes in oil and gas conservation matters.
4. Because many of the applications affected by this Docket concern wells located in Eastern Kansas, the Commission's actions in this proceeding will have a direct and profound impact on EKOGA's members. The Commission's determination of the issues in this Docket, which include

issues related to the sufficiency of legal notices and the treatment of applications by the Commission, could have a substantial and adverse impact upon Eastern Kansas oil and gas operators, including EKOGA members. EKOGA is willing and able to generally represent its members with respect to the issues before the Commission in this proceeding. No other party in this proceeding is able and willing to represent the general interests of EKOGA members in this Docket.

5. Through its membership EKOGA has at its disposal considerable expertise in matters concerning standard oil and gas practices, the economic impact of the Commission's actions in this Docket and the impact of such actions upon the oil and gas industry and upon the environment. EKOGA is prepared to provide technical and scholarly input regarding the issues before the Commission which can assist the Commission in its pursuit of justice without impairing the orderly and prompt conduct of the proceedings.

WHEREFORE, EKOGA prays that this Petition to Intervene be granted and that EKOGA be allowed to participate fully in the captioned matter.



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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF FRANKLIN)

Keith A. Brock, of lawful age, being first duly sworn on oath, states:

That he is the attorney for Eastern Kansas Oil & Gas Association, named in the foregoing Petition to Intervene, and is duly authorized to make this affidavit; that he has read the foregoing Petition to Intervene, and knows the contents thereof; and that the facts set forth therein are true and correct.



Keith A. Brock

SUBSCRIBED AND SWORN to before me this 22nd day of March, 2018.



Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 22nd day of March, 2018, addressed to:

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