

**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

Before Commissioners:                    Shari Feist Albrecht, Chair  
   Jay Scott Emler  
   Pat Apple

In the Matter of the Application of Town Oil	)	Docket No.: 15-CONS-241-CUIC
Company, Inc. to commence injection of	)	
Saltwater into the Squirrel Formation at the	)	CONSERVATION DIVISION
Savage Lease, Well #1-W, #2-W, #3W, #5W,	)	
and #6W, located in the NW/4 of Section 5,	)	License No.: 6142
Township 18 South, Range 21 East, Franklin	)	
County, Kansas	)	

**MOTION TO AMEND APPLICATION**

Town Oil Company, Inc., (“Applicant”), by and through its counsel, Jeffrey A. Wilson, Anderson & Byrd, LLP, hereby moves the Kansas Corporation Commission (“Commission”) for leave to amend its application, which amended application is attached hereto and incorporated herein by reference as Exhibit “A.” In support of its Motion, Applicant states:

1. Applicant filed an application with the Commission on August 28, 2014, seeking a permit to inject saltwater into the Squirrel formation for the Applicant’s wells on the Savage Lease, specifically wells #1-W, #2-W, #3W, #5W, and #6W, located in the NW/4 of Section 5, Township 18 South, Range 21 East, Franklin County, Kansas. Said application requested a maximum injection pressure of 100 psig.
2. The application contained a typographical error requesting 100 psig when, in reality, Applicant meant to request a maximum pressure of 400 psig. Therefore, the Applicant seeks leave to amend its original application so that the amended application reflects the correct pressure requested.
3. Notice of the original application was given to all parties listed in K.A.R. 82-3-135b(c).

4. Notice of the original application was published on August 14, 2014 in the Ottawa Herald, the official newspaper for Franklin County, Kansas. Said notice is included with Applicant's original application. Said notice stated the correct requested pressure, 400 psig. Therefore, a new notice publication should not be required as the original published notice was sufficient to advise any potential interested parties of the nature and extent of Applicant's application, as amended.
5. Upon basis of the above and foregoing, Applicant believes that no additional notice of this motion to amend the application is required and that the motion and the amended application may be granted without the notices contained in K.A.R. 82-3-135a and K.A.R. 82-3-402.

WHEREFORE, Applicant seeks leave from the Commission to file the amended application which is attached to this motion as Exhibit "A;" a preliminary ruling that notice of this application has been given in compliance with the rules, regulations, and laws governing this matter; and that an order be entered granting the amended application filed herein.

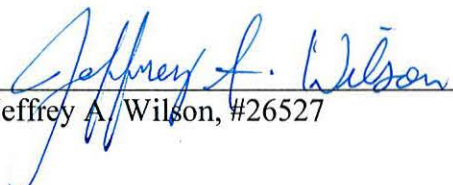
  
Jeffrey A. Wilson #26527  
ANDERSON & BYRD, LLP  
216 S. Hickory, P.O. Box 17  
Ottawa, Kansas 66067  
(785) 242-1234, telephone  
(785) 242-1279, facsimile  
[jwilson@andersonbyrd.com](mailto:jwilson@andersonbyrd.com)  
Attorneys for Applicant

**VERIFICATION**

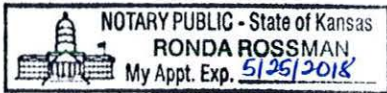
STATE OF KANSAS            )  
  ) ss:  
COUNTY OF FRANKLIN    )

Jeffrey A. Wilson, of lawful age, being first duly sworn, upon oath states:

That he is an attorney for Town Oil Company, Inc., the applicant herein, that he has read the above and foregoing Motion to Amend Application and Amended Application, knows the contents thereof, knows that all the statements made therein are true, and is authorized to make this Motion to Amended Application and Amended Application for the applicant.

  
\_\_\_\_\_  
Jeffrey A. Wilson, #26527

Subscribed and sworn to before me this 5<sup>th</sup> day of November, 2014.



  
\_\_\_\_\_  
Notary Public

My appointment expires:

**CERTIFICATE OF SERVICE**

On this 5<sup>th</sup> day of November, 2014, the undersigned certifies that he served a

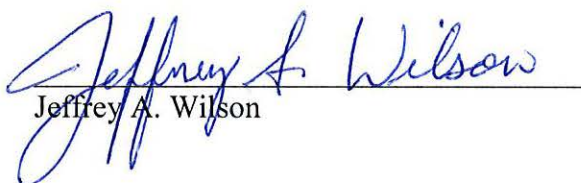
copy of the foregoing via first class mail, postage prepaid, as follows:

Alan Snider  
Tony Vail  
KCC UIC Department  
266 N. Main St., Suite 220  
Wichita, KS 67202

Terry and Alana Groshong  
P.O. Box 13061  
Overland Park, KS 66282

Lane Palmateer  
KCC Litigation Counsel  
266 N. Main St., Suite 220  
Wichita, KS 67202

Mark & Rebecca Enright  
4409 Hamilton Terrace  
Rantoul, KS 66079

  
Jeffrey A. Wilson