## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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

## MOTION TO INTERVENE AND PROTEST OF NORSTAR PETROLEUM, INC.

COMES NOW, Norstar Petroleum, Inc., ("Norstar") and hereby moves to intervene in and protest the Application of Palomino Petroleum, Inc. ("Palomino") for a well location exception as captioned above. In support of its intervention and protest, Norstar states as follows:

- 1. Palomino requests the Spectre #1 well be granted a well location exception.
- 2. Norstar owns and operates a lease and that the proposed well location will be less than 330 feet from its lease.
- 3. Norstar protests the granting of such well location exception in that the Spectre #1 well would adversely affect Norstar's correlative rights and result in waste.

WHEREFORE, Norstar respectfully requests the Commission not grant the well location exception requested in Palomino's Application.

Respectfully submitted,

MARTIN, PRINGLE, OLIVER, WALLACE & BAUER, L.L.P.

By: /s/Jeff Kennedy

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Attorneys for Norstar Petroleum, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 27th day of January, 2021, a true and correct copy of the above and foregoing *Motion to Intervene and Protest of Norstar Petroleum, Inc.*, was electronically filed with the Kansas Corporation Commission and e-mailed to:

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