

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

IN THE MATTER OF THE APPLICATION OF ) DOCKET NO. 21-CONS-3225-CWLE  
PALOMINO PETROLEUM, INC., FOR A )  
LOCATION EXCEPTION FOR ITS COOMBS- ) CONSERVATION DIVISION  
WILLIAMSON #2 WELL LOCATED IN THE )  
SE/4 OF SECTION 7-T18S-R24W, NESS ) LICENSE NO.: 30742  
COUNTY, KANSAS. )

**MOTION TO INTERVENE AND PROTEST OF**  
**PICKRELL DRILLING COMPANY, INC.**

COMES NOW, Pickrell Drilling Company, Inc., ("Pickrell") 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, Pickrell states as follows:

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

WHEREFORE, Pickrell 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

Jeff Kennedy, #12099

645 East Douglas, Suite 100

Wichita, KS 67202

Telephone: (316) 265-9311

[jkennedy@martinpringle.com](mailto:jkennedy@martinpringle.com)

*Attorneys for Pickrell Drilling Company, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 28th day of April, 2021, a true and correct copy of the above and foregoing *Motion to Intervene and Protest of Pickrell Drilling Company, Inc.*, was electronically filed with the Kansas Corporation Commission and e-mailed to:

Kelcey Marsh, Esq.  
Litigation Counsel  
Kansas Corporation Commission  
266 North Main Street, Ste. 220  
Wichita, KS 67202-1513

Jonathan R. Myers, Esq.  
Assistant General Counsel  
Kansas Corporation Commission  
266 N. Main St., Ste. 220  
Wichita, KS 67202-1513

Steven D. Gough, Esq.  
WITHERS, GOUGH, PIKE  
& PFAFF, LLC  
O. W. Garvey Building  
200 West Douglas, Suite 1010  
Wichita, KS 67202  
Attorneys for Applicant

/s/Jeff Kennedy  
Jeff Kennedy, #12099