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

)

)

)

)

)

In the Matter of a General Investigation to 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. DOCKET NO. 18-CONS-3224-CINV CONSERVATION DIVISION LICENSE NO. 3532

## **PETITION FOR INTERVENTION**

COMES NOW CMX, Inc. ("CMX"), by and through its counsel of record, and petitions this Commission for intervention in the captioned docket. In support of its Petition, CMX submits the following:

1. This matter involves the notice that was given for a number of underground Injection Well Applications and is the subject of an Order opening a general investigation in this docket dated November 21, 2017.

2. CMX should be granted intervenor status since it operates the following wells:

Scrooge 1 Section 7, Township 35 South, Range 11 West Barber County

Susank B 1-5 Section 5, Township 16 South, Range 13 West Barton County

Driscoll "C" 1 Section 20, Township 13 South, Range 14 West Russell County

CMX's legal rights as the operator of these wells may be substantially affected by this proceeding.

3. The granting of this Petition for Intervention will not delay or impede this matter in any way.

WHEREFORE, CMX, Inc., respectfully requests an Order from this Commission allowing it to intervene in the captioned matter, for such additional and further relief as the Commission may find appropriate under the circumstances.

Respectfully submitted,

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

Colunedy 12099 By Jeff Att

## VERIFICATION

STATE OF KANSAS ) ) ss: COUNTY OF KANSAS )

Jeff Kennedy, of lawful age, being first duly sworn, upon oath states:

That he is one of the attorneys for the intervenor, CMX, Inc., that he has read the above and foregoing Petition for Intervention, knows the contents thereof, and knows that all of the statements made therein are true.

eur Jeff Kennedy

SUBSCRIBED AND SWORN to before me this  $\frac{2744}{4}$  day of March, 2018.

DEBRA J. JACKSON Notary Public - State of Kansas My Appl. Expires / 0/16

Notary Public My Appointment Expires: 10/19

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of March, 2018, a true and correct copy was either deposited in the United State mail, postage prepaid, or sent electronically to the following named persons, to-wit:

David Bleakley, EKOGA Colt Energy, Inc. P. O. Box 388 Iola, KS 66749-0388 dpbleakley@msn.com

Jon Callen, KIOGA Edmiston Oil Company, Inc. 125 North Market, Suite 1420 Wichita, KS 67202-1714 jmcallen@edmistonoil.com

Mike Cochran, KDHE Kansas Department of Health and Environment 1000 SW Jackson Street, Suite 420 Topeka, KS 66612-1367 mcochran@KDHE.state.ks.us

Tim Boese, GWMD Equus Beds GMD #2 313 Spruce Street Halstead, KS 67056-1925 tboese@gmd2.org

Ryan Hoffman <u>r.hoffman@kcc.ks.gov</u> Rene Stucky, UIC Department <u>r.stucky@kcc.ks.gov</u> Jon Myers, Litigation Counsel <u>j.myers@kcc.ks.gov</u> Kansas Corporation Commission 266 North Main, Suite 220 Wichita, KS 67202-1513 Diane Knowles, KWO Kansas Water Office 900 SW Jackson Street, Suite 404 Topeka, KS 66612 <u>diane.knowles@kwo.ks.gov</u>

Kent Eckles, KPC Kansas Petroleum Council 800 SW Jackson Street, Suite 1005 Topeka, KS 66612 <u>ecklesk@api.org</u>

Mike Dealy, KGS Kansas Geological Society 4150 West Monroe Street Wichita, KS 67209-1261 mdealy@kgs.ku.edu

Terry Holdren, KFB/KLA Kansas Farm Bureau 2627 KFB Plaza Manhattan, KS 66503-8116 holdrent@kfb.org

Kenny Carter, SWKROA/EKROA Southwest Royalty Owners Association 209 East 6<sup>th</sup> Street Hugoton, KS 67951 <u>kennycarter@embarqmail.com</u>

Michael J. Duenes Assistant General Counsel 1500 SW Arrowhead Road Topeka, KS 66604 <u>m.duenes@kcc.ks.gov</u> Timothy E. McKee Amy Fellows Cline Triplett Woolf Garretson, LLC 2959 North Rock Road, Suite 300 Wichita, KS 67226 temckee@twgfirm.com amyclsine@twgfirm.com Attorneys for Lario Oil & Gas Co. and Larson Engineering, Inc.

David E. Bengtson Stinson, Leonard Street LLP 1625 North Waterfront Parkway, Suite 300 Wichita, KS 67206 <u>david.bengtson@stinson.com</u> Attorneys for Lario Oil & Gas Co. and Larson Engineering, Inc.

Keith A. Brock Anderson & Byrd, LLP 216 South Hickory P. O. Box 17 Ottawa, KS 66067 <u>kbrock@andersonbyrd.com</u> *Attorneys for Eastern Kansas Oil & Association* 

Kenneth L. Cole Woelk & Cole P. O. Box 431 Russell, KS 67665 woelkandcole@hotmail.com Attorneys for Russell Oil, Inc.

Jeff Kennedy