16-CONS-563-CUIC

ROBERT P. KEENAN (1922-2008)

LARRY E. KEENAN TIMOTHY R. KEENAN

MATTHEW A. TATE

KEENAN LAW FIRM, P.A.

ATTORNEYS AT LAW GREAT BEND, KANSAS 67530 2015-09-25 09:49:34 Kansas Corporation Commission /s/ Amy L. Gilbert

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timkeenan@klf.kscoxmail.com

September 15, 2015

Kansas Corporation Commission Oil & Gas Conservation Division Conservation Division 266 N. Main St. Suite 220 Wichita, Kansas 67202-1513

Permit #D25054.0 Mike Kelso Oil, Inc. Application to Amend Injection Permit "Schmidt#5" SE/4 of Section 4-19-10 Rice County, Kansas

Dear Sirs:

Our office represents K & N Petroleum, Inc., which received notice of the Application to Amend Injection Permit filed by Mike Kelso Oil, Inc., the operator of the above disposal well.

Our client objects to the proposed change in the authorized injection rate as requested by Kelso.

RE:

The authority of Kelso, as it now exists, is limited to 90 barrels of water per day. The increase to up to 2,000 barrels per day represents a huge increase. This very large increase is violative of K & N's correlative rights on its adjoining lease known as the "Oberle A-1".

K & N Petroleum, Inc. operates a producing oil and gas lease known as the "Oberle A-1" well located in the SE/4 of Section 5-19-10, Rice County. Our client's well produces from the Arbuckle formation. Our client's well produces approximately 40 barrels of water and 4.5 barrels of oil from the Arbuckle formation. Our client believes the injection by Kelso of such a large volume of additional water into the disposal well may cause harm to the production both now and the future being obtained from the K & N Petroleum "Oberle A-1" well.

For these reasons, our client objects to the approval of the application. Our client would agree that injection at the rate of no more than 750 barrels per day would not likely be detrimental to the K & N oil production, but anything over and above 750 barrels a day may cause significant harm and be a violation of K & N's correlative rights.

If something further is needed in order to register the protest of K & N Petroleum, Inc. to this application, please let us know.

KCC WICHITA SEP 1 6 2015 RECEIVED

Very truly yours,

KEENAN LAW FIRM, P.A.

Matthew A. Tate on Bohelfof Timothy R. Keenan Timothy Keenan

TRK/rh

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Ed Nemnich Mike Kelso Oil, Inc.