BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

	25-CONS-3299-CUIC
In the matter of the application of Patterson)	Docket No.: (Assigned by Staff)
Energy, LLC to Amend Injection Permit D-00801)	
At the Shutts "B" 1 well located in Ellis County,)	CONSERVATION DIVISION
Kansas)	
	License No.: 08061

Notice of Protest

Oil Producers, Inc. of Kansas (OPIK), 1710 Waterfront Pkwy, Wichita, KS 67206-6603, pursuant to K.A.R. 82-3-135b, protest the application of Patterson Energy, LLC (Patterson), to Amend Injection Permit D-00801.0, at the Shutts B #1, located in Ellis County, Kansas. In support hereof, the Protestants state:

- 1. OPIK is the operator of the Clinton D Lease, with two wells, API#'s 15-051-02380 and 15-051-26662, located in Northwest Quarter of Section 5, Township 12 South, Range 17 West, in Ellis County, Kansas, both above referenced wells have perforations or are open hole completed in the Arbuckle formation.
- 2. Patterson's Shutts B#1, API# 15-051-19140, is located in the Northeast Quarter of Section 5, Township 12 South, Range 17 West, in Ellis County, Kansas, and is actively disposing into the Arbuckle formation.

3. Patterson is requesting permission to increase the authorized injection rate at the Shutts B#1, API# 15-051-19140-00-00, from 1,200 bbl/day to 10,000 bbl/day, into the Arbuckle formation.

4.OPIK's Clinton D 3 and 5 wells and Patterson's Shutts B#1 are open in the same formations.

5. OPIK is concerned that the already approved 250-pound injection pressure combined with the newly requested maximum injection rate of 10,000 bbls per day poses a threat to OPIK's offset producing wells. The combination of these high rates and pressures could adversely affect oil production. Also, the significant increase of injection fluid could alter the wellbore's chemistry, leading to a bloom of bacteria resulting in costly downhole treatments.

WHEREFORE, the protestant ask that the Kansas Corporation Commission set this for hearing; that based on evidence and testimony, the Commission lower the max allowable injection rate and pressure of Patterson's permit application.

Scott M. Lawson

Oil Producers Inc. of Kansas

1710 Waterfront Parkway

Wichita, KS 67206

316-681-0231

Verification

State of Kansas	
County of Sedgwick	

Scott M. Lawson, of lawful age, being first duly sworn on oath, states: He is the Chief Operating Officer of Oil Producers, Inc. of Kansas and that he has read the above Notice of Protest, knows the contents, and knows that the statements made therein are true and correct to the best of my knowledge and belief.

Scott M. Lawson

Notary Public

Signed and sworn before me on ______ day of March 2025 by Scott M. Lawson.

My Commission expires 6.2.2026

DANIEL BALDWIN
Notary Public, State of Kansas
My Appointment Expires
6.2.2026

CERTIFICATE OF FILING AND SERVICE

I, Scott M. Lawson, do hereby certify that a true and correct copy of the above Notice of Protest was electronically filed in the KCC Electronic Filing System, and also mailed on the 7th day of March 2025, postage prepaid and properly addressed, by depositing the same in the United States mail, to:

Patterson Energy, LLC P.O. Box 400 Hays, KS 67601

Scott M. Lawson