

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

IN THE MATTER OF THE APPLICATION)	
OF UNIT PETROLEUM COMPANY FOR)	DOCKET NO. 17-CONS-3012-CUNI
AN ORDER APPROVING THE)	
UNITIZATION AND UNIT OPERATIONS OF)	OPERATOR NO. 34192
THE LANGDON WATERFLOOD UNIT IN)	
RENO COUNTY, KANSAS)	CONSERVATION DIVISION
)	

MOTION TO INTERVENE AND PROTEST OF TAPSTONE ENERGY

COMES NOW, Tapstone Energy ("Tapstone") and hereby moves to intervene in and protest the Application of Unit Petroleum Company. ("Unit Petroleum") for an Order approving the unitization and unit operations for the purpose of waterflooding the Langdon Waterflood Unit in Reno County, Kansas.

1. Unit Petroleum is requesting the Commission allow it to unitize and allow for unit operation for the purpose of waterflooding the Langdon Waterflood Unit in the W/2 of Section 15, all of Section 16, the E/2 of Section 17, the N/2 of Section 20, the N/2 and SE/4 of Section 21 and the W/2 of Section 22, all in Township 25 South, Range 9 West, Reno County, Kansas.

2. Tapstone owns and operates leases producing oil and gas on acreage adjacent to the proposed unit.

3. Tapstone is a working interest owner in the Preisser 2509 8-1H well located directly north and west of the proposed unit, in a unit covering the W/2 of Section 8, Township 25 South, Range 9 West and the W/2 of Section 8, Township 25 South, Range 9 West, Reno County, Kansas.

4. Tapstone is a working interest owner in the Nunemaker 2509 well located south and west of the proposed unit, in a unit covering the E/2 of Section 8, Township 25 South, Range 9 West and the W/2 of Section 17, Township 25 South, Range 9 West, Reno County, Kansas.

5. Waterflooding of the proposed unit will impact the formation from which Tapstone produces and will cause substantial and irreparable harm to Tapstones correlative rights.

6. Additional concerns with regard to Unit Petroleum's Application will be further outlined at the hearing.

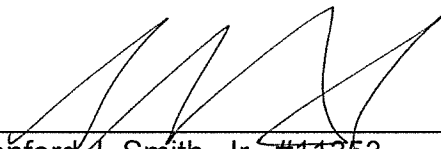
7. Tapstone respectfully requests that the Commission set this matter for a pre-hearing conference and for hearing.

WHEREFORE, Tapstone respectfully requests the Commission deny this Application in its entirety.

Respectfully submitted.

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

By



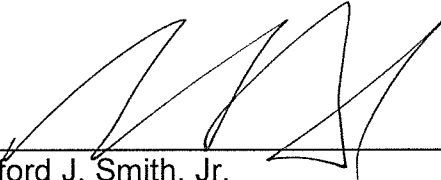
Stanford J. Smith, Jr., #11353
Robert J. Moody, #26398
100 North Broadway, Suite 500
Wichita, KS 67202
Telephone: (316) 265-9311
Attorneys for the Protestant

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

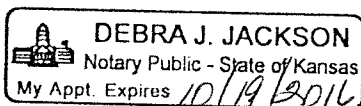
COMES NOW, Stanford J. Smith, Jr., of lawful age, being first duly sworn on his oath states:


That he is employed by Tapstone Energy as its attorney and is authorized to make this verification; that he has read the above and foregoing Motion to Intervene and Protest of Tapstone Energy, and is familiar with the contents thereof and that the statements made therein are true and correct to the best of his knowledge and belief.



Stanford J. Smith, Jr.

SUBSCRIBED AND SWORN to before me this 11th day of August, 2016.





Notary Public

My Appointment Expires:
10/19/2016

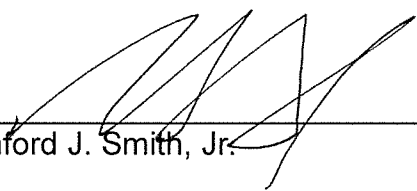
CERTIFICATE OF SERVICE

I hereby certify that the original of the foregoing Protest was mailed on this 11th day of August, 2016, addressed to the following named persons, to-wit:

John G. McCannon, Esq.
Litigation Counsel
Kansas Corporation Commission
266 North Main, Suite 220
Wichita, Kansas 67202

and a true and correct copy was deposited in the United State mail, postage prepaid to the following named persons, to-wit:

David E. Bengtson, Esq.
STINSON LEONARD STREET LLP
1625 North Waterfront Parkway, Suite 300
Wichita, KS 67206-6620
Attorneys for Unit Petroleum Company



Stanford J. Smith, Jr.