

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Jay Scott Emler, Chair
Shari Feist Albrecht, Commissioner
Pat Apple, Commissioner

In The Matter of the Application of)
Norstar Petroleum, Inc. for Authorization to)
Impose a Vacuum on its Hume Brothers Lease) DOCKET NO. 17-CONS-3403-CVAC
Located in the NW/4 of Section 34,)
Township 29 South, Range 41 West,) License No. 31652
Stanton County, Kansas)
_____) CONSERVATION DIVISION

PROTEST OF WHITE EXPLORATION, INC.

White Exploration, Inc. ("White") submits this protest in opposition to the Application filed by Norstar Petroleum, Inc. ("Norstar") in the above-captioned docket. In support of its protest, White states as follows:

1. Norstar filed an Application, pursuant to K.A.R. § 82-3-131, seeking permission to install vacuum compression on three wells that are located on the Hume Bros. Lease covering the NW/4 of Section 34, Township 29 South, Range 41 West, Stanton County, Kansas (the "Subject Wells").

2. White owns and operates producing wells on oil and gas leases located on lands that are adjacent to the Hume Bros. Lease. Specifically, White owns leases and operates wells the following lands:

SE/4 of Section 27-29S-41W

SE4 SE/4 & W/2 SE/4 of Section 28-29S-41W

NE/4 of Section 33-29S-41W

SW/4 & E/2 of Section 34-29S-41W

(the "White Wells" and the "White Leases") The White Wells on the White Leases are producing from the same formation as the wells owned by Norstar on the Hume Bros. Lease that are the subject of the Application in this docket. Thus, White has a direct and substantial interest in the subject matter of the Application filed by Norstar in this docket.

3. White opposes the Application filed by Norstar in this docket for, among other reasons, the following reasons:

First, White denies that the field from which the Subject Wells are producing is "nearly depleted" as required by K.A.R. § 82-3-131.

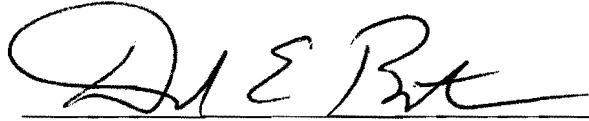
Second, White believes that the installation and use of vacuum pumps on the Subject Wells will violate White's correlative rights.

4. For the reasons set forth herein, White objects to the relief sought in the Application filed by Norstar in this docket and requests that this matter be set for hearing by the Commission.

5. Lastly, Norstar is a corporation and may not appear *pro se* in this docket. K.A.R. § 82-1-228(d)(2) provides that a corporation is only permitted to appear in matters before the Commission through an attorney. The Application in this docket was filed *pro se* and, for that reason, should be dismissed by the Commission.

WHEREFORE, White Exploration, Inc. hereby protests the Application filed by Norstar Petroleum Inc. in the above-captioned docket, requests that this matter either be dismissed or set for hearing by the Commission, and for such other and further relief as the Commission deems appropriate in the circumstances.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D E B", with a horizontal line drawn underneath it.

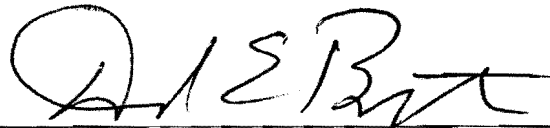
David E. Bengtson KS #12184
STINSON LEONARD STREET LLP
1625 North Waterfront Parkway, Suite 300
Wichita, Kansas 67206-6620
(316) 265-8800
Facsimile: (316) 265-1349

Attorneys for White Exploration, Inc.

VERIFICATION

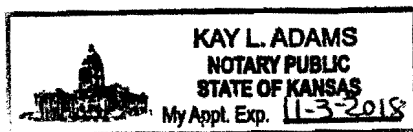
STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)


David E. Bengtson, of lawful age, being first duly sworn upon oath states that he is an attorney for White Exploration, Inc. and is duly authorized to make this verification; that he has read the foregoing protest and knows the contents thereof, and that the facts set forth therein are true and correct to the best of his information and belief.



David E. Bengtson

SUBSCRIBED AND SWORN to before me this 20th day of December, 2016.




Notary Public

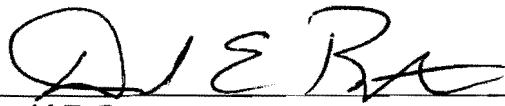
My Appointment Expires:
11/3/2018

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December, 2016, the foregoing Protest of White Exploration, Inc. was electronically filed with the Kansas Corporation Commission and served by U.S. Mail to:

John McCannon
Staff Counsel
Kansas Corporation Commission
266 N. Main, Suite 220
Wichita, Kansas 67202-1513

Brad Pfeiffer, Petroleum Engineer
Norstar Petroleum, Inc.
88 Inverness Cir. E, Unit F104
Denver, CO 80112



David E. Bengtson