## THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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

In the matter of the application of Quail Oil ) & Gas, LC to authorize injection of saltwater) into the Arbuckle formation at the Sly 2-6 ) SWD well, located in the NE NE SE of ) Section 6, Township 17S, Range 6E in ) Morris County, Kansas. Docket No: 17-CONS-3484-CUIC

CONSERVATION DIVISION

License No. 33185

## APPLICANT'S RESPONSE TO OBJECTION BY PROTESTANTS TO NOTICE OF APPLICATION

Applicant, Quail Oil & Gas, LC, by and through its undersigned counsel, hereby responds to the Objection by Protestants to Notice of Application.

- 1. Applicant hereby stipulates that it is seeking approval for a "maximum injection pressure of 500 psi" as set forth in the subject Notice.
- 2. That the requested injection pressure of 650 psi in the Application was meant to be corrected by the Applicant, and the Applicant so indicated to the Commission verbally prior to publication of the Notice.
- 3. That Wray Valentine's Pre-filed Direct Testimony at p. 3, line 11 indicates that even a higher, maximum pressure of 650 psig will not affect the correlative rights of others in the Camp Creek field or any of the producing wells within a <sup>1</sup>/<sub>4</sub> mile radius of the proposed injection well.

4. That since the Applicant is only seeking approval of a maximum injection pressure of 500 psi and not increasing the pressure, the Protestants are not prejudiced by the initial discrepancy between the Application and Notice and will have a meaningful opportunity

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to be heard. The maximum pressure set forth in the Notice and the maximum pressure the Applicant is seeking by stipulation are the same.

WHEREFORE, Applicant prays that the Commission dismiss the Protestants' Objection to Notice of Application as moot and immaterial.

Respectfully submitted,

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By Kobert 9. Vinese

Robert J. Vincze #14101 Joseph A. Schremmer #25968 Attorneys for Quail Oil & Gas, LC

## VERIFICATION

STATE OF KANSAS ) ) SS. COUNTY OF SEDGWICK

Robert J. Vincze, of lawful age, being first duly sworn upon oath, deposes and states: That he is an attorney for the above-named Applicant, that he has read the foregoing, and that the statements therein contained are true and correct according to his knowledge.

Robert J. Vincze

Subscribed and sworn to before me this 1 St day of June 2017.

My appointment expires: 9-13-18



## **CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of June 2017, I caused a complete and accurate copy of the foregoing Applicant's Response to Objection by Protestants to Notice of Application to be served via U.S. Mail, postage prepaid and properly addressed, to the following:

Robert V. Eye Robert V. Eye Law Office, LLC Suite 1010 4840 Bob Billings Parkway Lawrence, Kansas 66049 *Attorney for Protestants* 

And delivered electronically to:

Robert V. Eye Robert V. Eye Law Office, LLC bob@kauffmaneye.com

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Robert J. Vincze #1410