

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

IN THE MATTER OF THE APPLICATION OF)	DOCKET NO. 21-CONS-3127-CWLE
PALOMINO PETROLEUM, INC., FOR A)	
LOCATION EXCEPTION FOR ITS SPECTRE)	CONSERVATION DIVISION
#1 WELL LOCATED IN THE NW/4 NW/4 OF)	
SECTION 17-T18S-R24W, NESS COUNTY,)	LICENSE NO.: 30742
<u>KANSAS.</u>)	

**MOTION FOR RELIEF FROM THE ORDER GRANTING
APPLICATION AS AMENDED**

Pickrell Drilling Company, Inc., (“Pickrell”) files this motion to assure that the agreement that it reached with the Applicant is put in place. Otherwise, Pickrell and Norstar will need to refile their Motions to Intervene and Protest from early January, 2021.

1. Both Pickrell and Norstar are interested parties and have filed Motions to Intervene and Protest. Those protests were withdrawn based on an understanding that the Commission’s Order would reflect the agreement reached between Pickrell, Norstar, and Palomino Petroleum, Inc.

2. Although the Order grants Palomino the relief it needed, it is silent as to the wells that are planned by Pickrell and Norstar.

3. Pickrell and Norstar do not request a hearing in this matter, assuming that the location exceptions that they seek are granted. Otherwise, this matter will need to go to hearing, and Pickrell and Norstar reinstate their Motions to Intervene and Protest.

4. By finding jurisdiction over this Application, which it has, the Commission can initiate the relief requested by this Motion. That is essential to protect correlative rights and prevent waste of Pickrell and Norstar, as the Commission has so concluded.

WHEREFORE, this Motion seeks to have the relief found in the parties' agreement which the Commission has, or, alternative, this matter be set for hearing.

Respectfully submitted,

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

By: /s/Jeff Kennedy

Jeff Kennedy, #12099

645 East Douglas, Suite 100

Wichita, KS 67202

Telephone: (316) 265-9311

Facsimile: (316) 265-2955

jkennedy@martinpringle.com

Attorneys for Pickrell Drilling Company, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 28th day of April, 2021, a true and correct copy of the above and foregoing *Motion for Relief From the Order Granting Application as Amended* was electronically filed with the Kansas Corporation Commission and e-mailed to:

Kelcey Marsh, Esq.
Litigation Counsel
Kansas Corporation Commission
266 North Main Street, Ste. 220
Wichita, KS 67202-1513

Jonathan R. Myers, Esq.
Assistant General Counsel
Kansas Corporation Commission
266 N. Main St., Ste. 220
Wichita, KS 67202-1513

Steven D. Gough, Esq.
WITHERS, GOUGH, PIKE
& PFAFF, LLC
O. W. Garvey Building
200 West Douglas, Suite 1010
Wichita, KS 67202
Attorneys for Applicant

/s/Jeff Kennedy
Jeff Kennedy, #12099