

**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
KANSAS.)	

MOTION TO INTERVENE AND PROTEST OF PICKRELL DRILLING CO., INC.

COMES NOW, Pickrell Drilling Co., Inc., ("Pickrell") and hereby moves to intervene in and protest the Application of Palomino Petroleum, Inc. ("Palomino") for a well location exception as captioned above. In support of its intervention and protest, Pickrell states as follows:

1. Palomino requests the Spectre #1 well be granted a well location exception.
2. Pickrell owns and operates a lease and that the proposed well location will be less than 330 feet from its lease.
3. Pickrell protests the granting of such well location exception in that the Spectre #1 well would adversely affect Pickrell's correlative rights and result in waste

WHEREFORE, Pickrell respectfully requests the Commission not grant the well location exception requested in Palomino's Application.

Respectfully submitted,

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

By: /s/Jeff Kennedy

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20th day of January, 2021, a true and correct copy of the above and foregoing *Motion to Intervene and Protest of Pickrell Drilling Co., Inc.*, was electronically filed with the Kansas Corporation Commission and e-mailed to:

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