

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

In the Matter of the Application of)	
TDR Construction, Inc. to Authorize)	Docket No. 19-CONS-3167-CUIC
Injection of Saltwater into the)	
Squirrel Formation at the McCoy)	CONSERVATION DIVISION
#4WA, #8W, and #9W Wells Located)	
in Section 32, Township 15 South,)	License No. 32218
Range 21 East, Franklin County,)	
Kansas.)	

Reply to Motion to Dismiss and Motion to Accept Protests

COME NOW, Polly Shteamer, Protestant, who respectfully moves that the due date for the protestants pre-filed testimony due March 11, 2019, be extended two weeks to March 25, 2019. In support of her motion, Polly Shteamer states:

1. On October 12, 2018 TDR Construction, Inc. filed an Application seeking permit for injection of saltwater into the Squirrel formation at the McCoy 4WA, 8W, 9W located in Franklin County, Kansas.
2. A Prehearing conference was held on January 10, 2019 at which a procedural order was established.
3. February 19, 2019 Mr. Keith A. Brock filed a Motion to Dismiss Protests into the docket.
4. On February 28, 2019, a Reply to Motion to Dismiss and Motion to Accept Protests were filed by Scott Yeargain and Polly Shteamer.
5. Protestant Polly Shteamer believes that it is in the interest of the best use of the Commissioners' time at the hearing on this matter that the pre-filed

testimony of the protestants make as full and complete a case as is possible.

6. Protestant has not yet received the KCC's staff answers to the protestants discovery questions in regards to the issues in this docket.
7. Protestants have received the applicant's answers to the protestants discovery questions in regards to this docket. The protestants believe the applicant's answers to their discovery questions are incomplete, the protestants wish to have more time to work with the applicant to receive more complete information in response to their discovery questions.
8. The applicant's attorney, Keith Brock, indicates he is willing to work with the protestants to provide more complete information.

WHEREFORE, Protestant moves the Commission for an extension of time in the filing of Protestant's pre-filed testimony ordering a new due date of March 25 and to place in this Docket an order directing Commission Staff to proceed with new dates as required.

Polly Shteamer
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CERTIFICATE OF SERVICE

I certify that a true copy of the above and foregoing was served to the following parties electronically on February 28th, 2019.

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