

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the request to transfer wells)
from Daylight Petroleum, LLC to Bluejacket)
Operating, LLC.) Docket No. 25-CONS-3235-CMSC

**DAYLIGHT PETROLEUM, LLC’S RESPONSE TO STAFF’S
MOTION RECOMMENDING PROCEDURAL SCHEDULE**

Daylight Petroleum, LLC by and through its attorney, Keith A. Brock, hereby files this Response to Staff’s Motion Recommending Proposed Procedural Schedule.

1. In this Docket Daylight and Bluejacket essentially argue that Staff is abusing its power by imposing subjective restrictions and criteria upon the transfer of wells from Daylight to Bluejacket which are not found in the law. Daylight and Bluejacket further allege that this is being done in order to exercise undue leverage over Daylight in an unrelated docket, i.e. Docket 25-CONS-3040-CMSC.

2. Staff is asking that the procedural schedule in this Docket be delayed until after a final order is issued in Docket 25-CONS-3040-CMSC, thus affirming the contentions by Daylight and Bluejacket in paragraph 1 above.

3. In addition, the communications exchanged by Staff indicate that the sole reason why the T-1 transfers from Daylight to Bluejacket were initially delayed and subsequently canceled by Staff was because “[w]e [i.e. Staff] currently have ongoing litigation with Daylight Petroleum.” As indicated in the Motion to Dismiss filed herein, there is no legal basis which allows the Commission to condition or even delay the transfer of wells from Daylight to Bluejacket on some unrelated issue that does not involve the leases which are the subject of the T-1 transfers.

4. Daylight and Bluejacket have already been prejudiced by the delay in processing the

T-1 transfers, and by the time and expense incurred in this Docket. There is no legal justification for further delaying the approval of the T-1 transfers, since the wells/leases at issue in Docket 25-CONS-3040-CMSC are completely unrelated to the leases/wells at issue in this Docket. The only similarity between the two dockets is that Daylight is a party to both Dockets and is actively participating in both Dockets.

5. For the reasons set forth above, Daylight recommends the following procedural schedule for the Commission's consideration in this Docket:

- a. Commission Staff Pre-filed Direct Testimony due April 30, 2025.
- b. Daylight/Bluejacket Pre-filed Direct & Rebuttal Testimony due May 21, 2025.
- c. Commission Staff's Pre-filed Rebuttal Testimony due June 4, 2025.

WHEREFORE, Daylight Petroleum, LLC respectfully requests the Commission issue an Order adopting the procedural schedule recommended by Daylight in this Response.

/s/ Keith A. Brock

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 28th day of March, 2025, addressed to:

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