

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

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

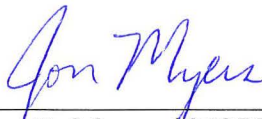
In the matter of the failure of Energyquest II,) Docket No.: 16-CONS-4068-CPEN
LLC ("Operator") to comply with K.A.R. 82-)
3-400 regarding injection that took place) CONSERVATION DIVISION
during the 2015 calendar year.)
_____) License No.: 35216

**STAFF'S RESPONSE IN OPPOSITION TO OPERATOR'S
MOTION TO SUSPEND PROCEDURAL SCHEDULE**

Staff sees no need to suspend the procedural schedule. Operator posits that the Commission needs time to consider Operator's motion to dismiss. While that is no doubt true, it is over four weeks until Operator's pre-filed testimony is due and nearly seven weeks until the scheduled evidentiary hearing. Staff has responded to Operator's motion to dismiss, and so the motion is already ripe for the Commission's consideration.

Further, as discussed in Staff's response to Operator's motion to dismiss, the Commission has already ruled against arguments virtually identical to those in Operator's motion to dismiss seven times in the last year. The Commission took less than a month to rule in the previous dockets. Suspension of the procedural schedule would serve no purpose aside from potentially delaying the hearing Operator itself has requested, and at best would simply create unnecessary administrative burdens. Operator's motion should be denied.

Respectfully submitted,

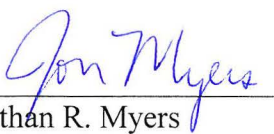


Jonathan R. Myers, #25975
Litigation Counsel
Kansas Corporation Commission
266 N. Market, Suite 220
Wichita, Kansas 67202
Phone: 316-337-6200; Fax: 316-337-6211

CERTIFICATE OF SERVICE

I certify that on 9/9/16, I caused a complete and accurate copy of this Response to Operator's Motion to Suspend Procedural Schedule to be served via United States mail, with the postage prepaid and properly addressed to the following:

David E. Bengtson
Stinson Leonard Street LLP
1625 N. Waterfront Parkway, Suite 300
Wichita, Kansas 67206
Attorney for EnergyQuest II, LLC


Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission