

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

In the matter of the application of Mid-Continent	)	Docket No. 21-CONS-3126-CUIC
Energy Corp. for a permit to authorize the	)	
injection of saltwater into the Pawnee and Fort	)	CONSERVATION DIVISION
Scott formations at the Seamster #1A well in	)	
Section 9, Township 34 South, Range 8 East,	)	License No. 5205
<u>Cowley County, Kansas.</u>	)	

**SECOND MOTION TO EXPAND PROCEDURAL SCHEDULE**

Applicant Mid-Continent Energy Corp. (“Applicant”) respectfully moves the Commission for an order expanding the procedural schedule for a period of two weeks. In support of its motion, Applicant states as follows:

1. On November 30, 2020, Applicant submitted an Application for Injection Well (“Application”) for its Seamster #1A well (“Subject Well”), API No. 15-035-2352, located 3,630’ FSL, 4,380’ FEL of Section 9-T34S-R8E, Cowley County, Kansas. Applicant seeks permission to inject saltwater through the Subject Well into the Pawnee and Ft. Scott formations at a maximum injection rate of 250 BOWD at a maximum injection pressure of 150 psig.

2. On December 14, 2020, Larry and Karen Chambers (together, “Protester”) filed a protest to the Application.

3. On January 28, 2021, a prehearing conference was held, wherein the Presiding Officer entered a procedural schedule.

4. On February 16, 2021, Applicant filed an unopposed motion requesting that the procedural schedule be expanded by four weeks to allow Applicant time to weigh the economics of conducting certain Staff requested remedial work at a well within the area of review of the Subject Well, as compared to other options Applicant may have for saltwater produced from the oil and gas leases at issue.

5. On February 16, 2021, the Commission entered an order granting Applicant's motion to expand and amended the procedural schedule as follows:

Operator (Mid-Continent) Pre-Filed Direct Testimony Due:	March 22, 2021
Protesters' (Mr. & Mrs. Chambers) Pre-Filed Direct Testimony Due:	April 5, 2021
Commission Staff's Pre-Filed Direct & Rebuttal Testimony Due:	April 19, 2021
Operator & Protester Rebuttal Testimony Due:	May 3, 2021

Deadline to Make Discovery Requests:	April 22, 2021
Deadline to Submit Any Settlement for Consideration:	May 3, 2021

Evidentiary Hearing before the Commission:	<b>To Be Determined</b>
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6. Unfortunately, Applicant's technical consultant became ill during the expanded time period, and was unavailable to timely complete the above described diligence.

7. As a result, Applicant makes this second request to expand the procedural schedule by an additional two (2) weeks as to each of the amended deadline dates above set forth. The additional time will allow Applicant to complete its diligence, and to prepare and submit prefiled testimony should it be necessary.

8. Applicant has correspondence with Commission Staff and the Protester regarding a two-week extension, and neither party has any objection.

9. No party will be prejudiced by the granting of this motion, as a hearing in this matter has not yet been scheduled and none of the deadline dates in the existing procedural schedule have passed.

WHEREFORE, for the foregoing reasons, Applicant respectfully requests the Commission or Presiding Officer enter an order expanding the procedural schedule for a period of two (2) weeks, and to provide for such other relief as it deems just and proper.

MORRIS, LAING, EVANS, BROCK  
& KENNEDY, CHTD.

By: \_\_\_\_\_

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*Attorneys for Mid-Continent Energy Corp.*

**VERIFICATION**

STATE OF KANSAS                    )  
  ) ss:  
COUNTY OF SEDGWICK            )

Jonathan A. Schlatter, being of lawful age and being first duly sworn upon his oath, deposes and says:

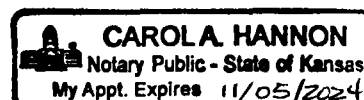
That he is the attorney for Mid-Continent Energy Corp.; he has read the above and forgoing **Second Motion to Expand Procedural Schedule** and is familiar with its contents, and that the statements made therein are true and correct to the best of his knowledge and belief.

\_\_\_\_\_  
Jonathan A. Schlatter

SIGNED AND SWORN to before me this 22<sup>nd</sup> day of March, 2021.

My Appointment expires: 11/05/2024

\_\_\_\_\_  
Notary Public



## CERTIFICATE OF SERVICE

The undersigned certifies this 22<sup>nd</sup> day of March, 2021, that a true and correct copy of the foregoing **Second Motion to Expand Procedural Schedule** has been served as described below:

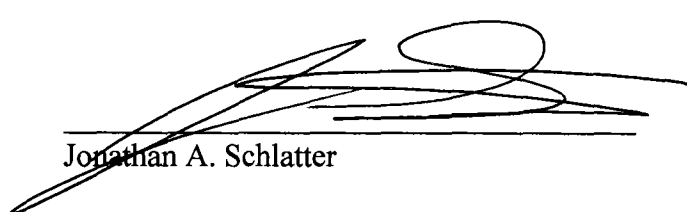
*Via email to:*

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Jonathan A. Schlatter