

**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>	)	

**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 four weeks. In support 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 ("Protester") filed a protest to the Application.

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

Operator (Mid-Continent) Pre-Filed Direct Testimony Due:	February 22, 2021
Protesters' (Mr. & Mrs. Chambers) Pre-Filed Direct Testimony Due:	March 8, 2021
Commission Staff's Pre-Filed Direct & Rebuttal Testimony Due:	March 22, 2021
Operator & Protester Rebuttal Testimony Due:	April 5, 2021
Deadline to Make Discovery Requests:	March 25, 2021
Deadline to Submit Any Settlement for Consideration:	April 5, 2021
Evidentiary Hearing before the Commission:	<b>To Be Determined</b>

4. Commission staff has identified a well within the area of review of the Subject Well that may require remedial work as a condition to approving the Application. On February 12,

2021, Commission Staff and representatives of Applicant conducted a phone conference to discuss the scope and nature of said remedial work.

5. In light of the foregoing, Applicant requests that the procedural schedule be expanded by four (4) weeks as to each deadline date set forth above to allow it time to weigh the economics of conducting the requested remedial work as compared to other options it may have to inject produced saltwater.

6. Applicant has consulted with Commission Staff and Protester about the expanded procedural proposed herein, and neither party has any objection.

7. 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. Granting the motion will prevent waste, because the time and expense of preparing prefiled testimony that may ultimately not be necessary could be avoided.

WHEREFORE, for the foregoing reasons, Applicant respectfully requests the Commission or Presiding Officer enter an order expanding the procedural schedule for a period of four (4) 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**

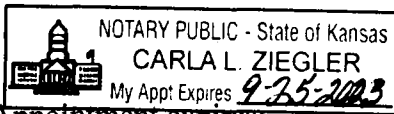
STATE OF KANSAS                    )  
  ) ss:  
COUNTY OF SEDGWICK            )

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

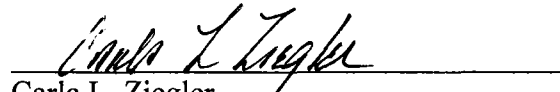
That he is the attorney for Mid-Continent Energy Corp.; he has read the above and forgoing Motion to Expand Procedural Schedule and is familiar with its contents, and that the statements made therein are true and correct to the best of his knowledge and belief.

  
Jonathan A. Schlatter

SIGNED AND SWORN to before me this 16<sup>th</sup> day of February, 2021.



My Appointment expires:  
September 25, 2023.

  
Carla L. Ziegler  
Notary Public

## CERTIFICATE OF SERVICE

The undersigned certifies this 16<sup>th</sup> day of February, 2021, that a true and correct copy of the foregoing **Motion to Expand Procedural Schedule** has been served as described below:

*Via email to:*

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Jonathan A. Schlatter