

SEP 09 2016

LEGAL SECTION

2016-09-09 13:21:19  
Kansas Corporation Commission  
/s/ Amy L. Green

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 application of Agricultural	)	Docket No.: 16-CONS-4029-CEXC
Energy Services, applicant, for an exception to the	)	
10-year time limitation of K.A.R. 82-3-111 for its	)	CONSERVATION DIVISION
Diamond Sleeper 1-25 well located in the C W	)	
NW/4 SE/4 25-33-31W, Seward County, Kansas	)	License No.: 34089

**MOTION FOR CONTINUANCE**

COMES NOW Anthony T. Hunter, Attorney, and moves the Commission for an order continuing the filing deadlines for direct testimony upon the following grounds:

1. The undersigned conferred with the attorney of record for the Applicant via telephone on September 8, 2016 to inform him of a change of representation for Mr. Fox, *et al.* During the call, Mr. Hirsch indicated that the missed September 6, 2016 deadline for filing of Applicant's direct testimony might be remedied with some additional time.
2. The undersigned would benefit from additional time to gather documentary evidence for the Commission's review from Mr. Fox, *et al.*
3. The undersigned conferred with Mr. John McCannon, Litigation Counsel, on September 8, 2016. Mr. McCannon indicated he had no objection to extending the filing deadlines for testimony as described below.
4. The undersigned has been authorized by all attorneys of record in the matter – including Mr. Schwartz, per a phone call on this date – to represent to the Commission that this motion is unopposed.

WHEREFORE, in consideration of the foregoing, the undersigned moves the Commission for an order changing the filing deadlines in the captioned matter as follows:

Applicant's Pre-filed Direct Testimony	Due by October 3, 2016
Protestant's Pre-filed Direct Testimony	Due by October 10, 2016
Staff's Pre-filed Direct Testimony	Due by October 17, 2016

No change to the deadline for Rebuttal Testimony or settlement deadline was discussed by the attorneys of record. No change to the current Evidentiary Hearing date is required.

Respectfully Submitted this 9<sup>th</sup> day of September, 2016.



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Attorney for Warren F. Fox,  
ABC Trust, LP, and LAL Trust, LP

**CERTIFICATE OF SERVICE**

I certify that I caused a true and correct copy of the foregoing document to be mailed via U.S. Postal Service and via electronic mail (where applicable) to the below named parties.

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Conservation Division  
266 N. Main St., Suite 220  
Wichita, KS 67202-1513

Signed, this 9<sup>th</sup> Day of September, 2016.

A handwritten signature in black ink, appearing to be 'KH', is written above a horizontal line.