

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

BEFORE COMMISSIONERS: Shari Feist Albrecht, Chair  
Jay Scott Emler  
Pat Apple

In the Matter of the Application of Dexxon, Inc. for )	
an Amendment to a Permit Authorizing the )	
Disposal of Produced Water into the Applicant's )	Docket No.: 15-CONS-240-CUIC
Latimer #2 in the Northeast Quarter of Section 12, )	
Township 33 South, Range 2 West, Sumner )	
County, Kansas. )	CONSERVATION DIVISION

**APPLICANT'S MOTION TO CONTINUE DEADLINES**

COMES NOW Dexxon, Inc., by and through its attorneys, Timothy E. McKee and Amy Fellows Cline of Triplett, Woolf & Garretson, LLC, and moves to continue the deadlines in the current scheduling order. In support of its motion, Dexxon, Inc. offers the following:

1. A prehearing conference was held in this matter on October 28, 2014. During that conference, protestants Mike and Betty Staley orally withdrew their protest. Commission Staff requested Mr. and Mrs. Staley submit a written withdrawal of their protest for filing in this docket.

2. To Dexxon, Inc.'s knowledge and belief, Mr. and Mr. Staley have not yet submitted a written withdrawal of their protest.

3. Dexxon, Inc. seeks to continue the deadlines as follows:

Applicant's pre-filed direct testimony	January 5, 2015
Protestants' pre-filed direct testimony	January 19, 2015
Staff's pre-filed direct testimony	January 26, 2015
Rebuttal Testimony & Discovery cut-off	February 9, 2015
Evidentiary Hearing before the Commission	February 19, 2015 at 10:00 a.m.

5. The extension is necessary to allow Applicant time to prepare its pre-filed testimony, should the protest not be withdrawn.

6. Dexxon, Inc. has communicated in writing with Mr. and Mrs. Staley regarding the withdrawal of their protest, but has not received a response. Dexxon, Inc. has no telephone number by which it could communicate with Mr. and Mrs. Staley.

7. No prejudice will result from the granting of this motion.

WHEREFORE, Dexxon, Inc. prays that the Commission grant its motion and continue the deadlines in this matter as proposed by Dexxon, Inc.

Respectfully submitted,

TRIPLETT, WOOLF & GARRETSON, LLC

By 

Timothy E. McKee, #7135

Amy Fellows Cline, #19995

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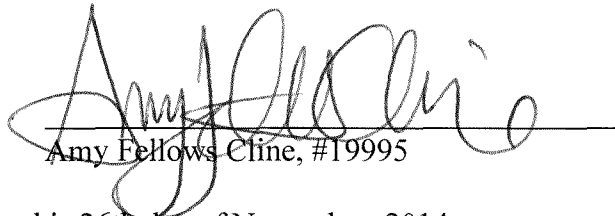
[amycline@twgfirm.com](mailto:amycline@twgfirm.com)

*Attorneys for Operator Dexxon, Inc.*

**VERIFICATION**

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SEDGWICK    )

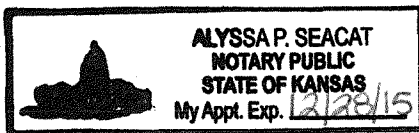
Amy Fellows Cline, of lawful age, being first duly sworn, upon oath states: I one of the attorneys entered in this matter on behalf of Dexxon, Inc., and I have read the above Motion, know the contents and know that the statements made therein are true and correct, to the best of my knowledge and belief.

  
Amy Fellows Cline, #19995

Subscribed and sworn to before me this 26th day of November, 2014.

  
NOTARY PUBLIC

My appointment expires:



## **CERTIFICATE OF SERVICE**

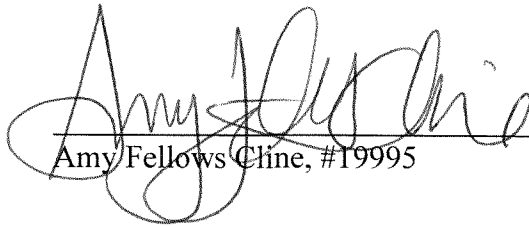
I hereby certify that on this 26th day of November, 2014, a copy of the above Motion was sent via United States Mail, postage prepaid, and addressed to:

Mike & Betty Staley  
62520 State Highway 11  
Shidler, OK 74652  
*Protestants*

And electronically served on:

Jonathan R. Myers  
Prehearing Officer  
Kansas Corporation Commission  
266 N. Main St. Ste. 220  
Wichita, KS 67202

Lane Palmateer  
Litigation Counsel  
Kansas Corporation Commission  
266 N. Main St. Ste. 220  
Wichita, KS 67202



Amy Fellows Cline, #19995