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THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

In the Matter of an Order Reducing Saltwater Injection Rates into the Arbuckle Formation, Applicable to Wells in Defined Areas of Increased Seismic Activity in Harper and Sumner Counties) Docket No. 15-CONS-770-CMSC
)
) CONSERVATION DIVISION
)
)

MOTION TO INTERVENE AND REQUEST FOR HEARING

SandRidge Exploration and Production, LLC ("SandRidge") petitions the Commission for an Order allowing SandRidge to intervene in the above-captioned docket, and requests that the Commission schedule a hearing in this docket. In support of its motion and request, SandRidge states and alleges as follows:

1. SandRidge owns and operates injection wells in Harper County and Sumner County, Kansas. SandRidge is duly authorized to do business in Kansas and has been issued KCC Operator License No. 34192.

2. The injection wells owned and operated by SandRidge in Harper County and Sumner County, Kansas, include wells that inject water into the Arbuckle formation, are considered "high volume" injection wells, and are located within the "areas of heightened seismic activities," all as defined in the Order Reducing Saltwater Injection Rates entered on March 19, 2015 in the above captioned docket (the "Order"). All of those injection wells are being operated by SandRidge pursuant to injection well permits issued by the Commission. The terms of those permits were modified by the Order. Therefore, SandRidge has been directly impacted by the restrictions and obligations imposed by the Commission in the Order.

SandRidge seeks intervention for purposes of participating in and requesting a hearing on the issues raised and restrictions imposed by the Kansas Corporation Commission (the “Commission”) in the Order.

3. SandRidge is so situated that its legal rights and interests as the owner and operator of injection wells impacted by the Order have been substantially affected by the proceedings herein and, accordingly, is entitled to intervene herein pursuant to K.S.A. § 77-521 and K.A.R. § 82-1-225.

4. There is no deadline to intervene in this docket and the interests of justice and the orderly and prompt conduct of the proceedings in this matter will not be impaired by granting SandRidge’s request to intervene. No party will be prejudiced by granting the requested intervention.

5. Copies of this Petition to Intervene have been mailed to those persons and entities shown on the Certificate of Service attached hereto.

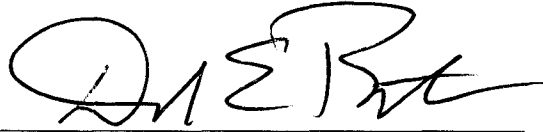
6. SandRidge requests that copies of all communications, correspondence, filings with the Commission, and notices be sent to their undersigned counsel.

7. In addition, pursuant to paragraph C of the Order, SandRidge hereby requests that the Commission schedule a hearing in this docket. This request for a hearing is submitted to comply with the deadline for requesting a hearing as set forth in the Order. At this time, SandRidge is not certain that it will further pursue a hearing in this docket, but SandRidge has submitted this request to preserve its right to request that a hearing be held, if necessary.

WHEREFORE, SandRidge Exploration and Production, LLC requests that the Commission enter an order allowing it to intervene in the above-captioned matter and to fully participate therein, recognizing that SandRidge has timely requested a hearing as required by the

Order and preserving SandRidge's right to have a hearing in this docket, and for such other relief as the Commission deems just and proper.

Dated: April 17, 2015



David E. Bengtson (#12184)
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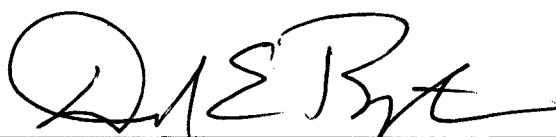
*Attorneys for SandRidge Exploration and
Production, LLC*

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

David E. Bengtson, of lawful age, being first duly sworn upon oath states:

That he is the attorney for SandRidge Exploration and Production, LLC named in the foregoing Motion to Intervene and Request for Hearing is duly authorized to make this verification; that he has read the foregoing Motion to Intervene and Request for Hearing and knows the contents thereof and that the facts set forth therein are true and correct to the best of his information and belief.



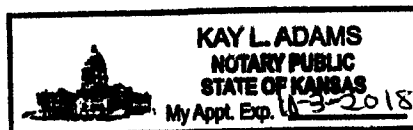
David E. Bengtson

SUBSCRIBED AND SWORN to before me this 17th day of April, 2015.



Notary Public

My Appointment Expires:
11/3/2018

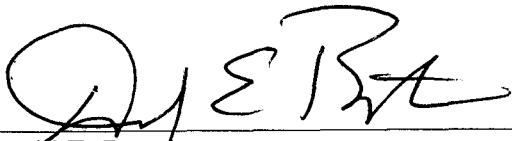


CERTIFICATE OF SERVICE

I certify that on April 17, 2015, I caused a complete and accurate copy of the above and foregoing Motion to Intervene and Request for Hearing to be served via United States mail, postage prepaid and properly addressed to the following:

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Wichita, KS 67202-1513

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David E. Bengtson