

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the matter of the Application of White)	Docket No. 21-CONS-3293-CEXC
Exploration, Inc. for an extension to the pit)	
closure time requirement of K.A.R. 82-3-602)	
for the Youngers #1 well located in the NE/4)	CONSERVATION DIVISION
of Section 22, Township 31 South, Range 12)	
West, Barber County, Kansas)	License No. 31652

ENTRY OF APPEARANCE & REQUEST FOR HEARING

David E. Bengtson of Stinson LLP hereby enters his appearance on behalf of the Applicant White Exploration, Inc. ("White Exploration") in the above-captioned docket. Notice of any hearing, motion or other proceeding in this matter, and all prefiled testimony, prefiled exhibits, and any other documents filed herein by any other party or the Commission Staff shall be served upon White Exploration, Inc. by serving its attorney, David E. Bengtson, Stinson LLP, 1625 N. Waterfront Parkway, Suite 300, Wichita, Kansas 67206 -6620.

In addition, in accordance with the Order Denying Application entered in this docket, White Exploration requests a hearing in this docket. White Exploration has been unable to close the pit that was the subject of this Application in accordance with the time periods set forth in K.A.R. § 82-3-602(a)(2) due to circumstances beyond the reasonable control of White Exploration. Accordingly, White Exploration will seek to amend its Application to seek relief under K.A.R. § 82-3-100(b) to allow it sufficient time to close the pit under the circumstances.

Dated: March 15, 2022

/s/ David E. Bengtson

David E. Bengtson (#12184)
STINSON LLP
1625 N. Waterfront Parkway, Suite 300
Wichita, Kansas 67206-6620
Telephone: (316) 265-8800
Facsimile: (316) 265-1349
Email: david.bengtson@stinson.com

Attorneys for White Exploration, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of March, 2022, the foregoing Entry of Appearance and Request for Hearing was electronically filed with the Kansas Corporation Commission and served by electronic mail to:

Kathleen Haynes
Kansas Corporation Commission
266 N. Main St., Suite 220
Wichita, KS 67202-1513
k.haynes@kcc.ks.gov

Richard Hestermann
Kansas Corporation Commission
266 N. Main St., Suite 220
Wichita, KS 67202-1513
r.hestermann@kcc.ks.gov

Kelcey Marsh, Litigation Counsel
Kansas Corporation Commission
266 N. Main St., Suite 220
Wichita, KS 67202-1513
k.marsh@kcc.ks.gov

/s/ David E. Bengtson

David E. Bengtson