BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners:	Dwight D. Keen, Chair Shari Feist Albrecht Susan K. Duffy
n the Matter of the Application of Jim)
Snyder, Inc. to Authorize the Injection of)
Saltwater into the Bartlesville Formation at) Docket No.19-CONS-3393-CUIC
he Drumm #2, Drumm #23, and the Saco)
Drumm #4 Wells Located in Section 20 and) CONSERVATION DIVISION
Section 30, Township 26 South, Range 8)
East, Butler County, Kansas.) Operator # 35164
)

MOTION FOR 90-DAY CONTINUANCE

COMES NOW, Jim Snyder, Inc., the Applicant in the above-captioned matter, and requests a 90-day stay and continuance of the procedural schedule established by Commission in its Order dated October 9, 2019. In support of its motion, Applicant states the following:

- Applicant's original attorney seeks to withdraw from the case, and pending approval of the Commission for the withdrawal, Applicant has now secured the undersigned substitute counsel who requires time to:
 - a. Become acquainted with the facts and circumstances in the case;
 - Assist the Applicant with identifying appropriate witness(es) and consultant(s)
 and preparing testimony; and
 - c. Explore any and all available alternatives, including ongoing settlement discussions with the Protestant.

2. If this continuance is not granted, the Applicant's position and ability to present

appropriate supporting evidence for its Application will be compromised, thereby

frustrating its ability to prudently operate its leases that are subject to this Application,

and thereby causing waste and harming the correlative rights of the mineral owners.

3. The undersigned counsel for Applicant has contacted Kelcey Marsh, counsel for the KCC

Staff; Jon Schlatter, counsel for the Protestant, and Jeff Kennedy, Applicant's original

counsel; and is authorized to state that none of the contacted counsel object to this

continuance.

FOR THE FOREGOING REASONS, the Applicant, Jim Snyder, Inc., requests an order

imposing a 90-day stay and continuance of the procedural schedule established by Commission

in its Order dated October 9, 2019, and for such other relief as the Commission deems necessary

and appropriate.

Respectfully submitted,

EDMISTON LAW OFFICE, LLC

By: /s/ Diana Edmiston

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Attorney for Jim Snyder, Inc.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this **26**th day of **November**, **2019**, she caused the above and foregoing **Motion** to be electronically filed with the Kansas Corporation Commission, Conservation Division, and that she caused a true and correct copy of the same to be served via electronic mail, to the following persons at the addresses shown:

Jonathan A. Schlatter, Esq. jschlatter@morrislaing.com
Attorneys for Protestant Flint Hills Land & Cattle Co.

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