



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,

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By: /s/ Diana Edmiston

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*Attorney for Jim Snyder, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this **26<sup>th</sup>** 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:

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/s/ Diana Edmiston

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