

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Application of Triple T Oil, LLC, to )  
Authorize the Injection of Saltwater into the Squirrel )  
Formation at the Weaver Lease, Well Nos. I-1, I-2, I-3, I-7 ) Docket No. 15-CONS-456-CUIC  
and I-8 Located in Section 18, Township 16 South, Range )  
24 East, Miami County, Kansas. )

**RESPONSE TO MOTION TO STAY ALL PROCEEDINGS**

Triple T Oil, LLC submits the following in support of its Response to the Trust Motion to Stay all Proceedings filed by Protestant herein:

1. The Protestant seeks and order staying these proceedings until the Federal Government releases rules imposing stricter controls on hydraulic fracturing.
2. Any proposed rules relating to hydraulic fracturing would not be relevant to these proceedings as this Docket does not involve hydraulic fracturing and Applicant is not seeking authority to hydraulically fracture any wells. This Docket is an application for injection authority into three wells to be used for enhanced oil recovery operations.
3. Even if this Docket did involve hydraulic fracturing it would be improper to stay these proceedings based upon a newspaper article speculating that the current presidential administration is "planning" to release new regulations.
4. Protestant has not provided a sufficient basis upon which the Commission can grant his Motion to Stay All Proceedings, therefore such motion must be denied.

WHEREFORE, Applicant prays for an order denying Protestant's Motion to Stay All Proceedings in its entirety and for such other and further relief as the Commission deems just and

equitable.



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Attorneys for Triple T Oil, LLC

STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

Keith A. Brock, of lawful age, being first duly sworn on oath, states: That he is the attorney for Triple T Oil, Inc. named above, and is duly authorized to make this affidavit; that he has read the foregoing Response to Motion to Stay all Proceedings, knows the contents thereof; and that the facts set forth therein are true and correct.



Keith A. Brock

SUBSCRIBED AND SWORN to before me this 13<sup>th</sup> day of January, 2015.



Notary Public

### CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was mailed, postage prepaid, this 13<sup>th</sup> day of January, 2015, addressed to: Mr. Lane R. Palmateer, Litigation Counsel, Kansas Corporation Commission, Conservation Division, 266 N. Main Street, Suite 220, Wichita, Kansas 67202-1513 and Mr. James D. Howell, Jr., Co-Trustee of the Nellie J. Howell Irrevocable Trust, 26789 Block Road, Paola, Kansas 66071.



Keith A. Brock