BEFORE THE KANSAS CORPORATION COMMISSION OF THE STATE OF KANSAS

IN THE MATTER OF THE REQUEST TO)	DOCKET NO. 25-CONS-3235-CMSC
TRANSFER CERTAIN WELLS FROM)	
DAYLIGHT PETROLEUM, LLC TO)	License No: 35639
BLUEJACKET OPERATING LLC)	36169
)	

RESPONSE

COMES NOW Bluejacket Operating LLC ("Bluejacket" or "Intervenor") and hereby submits this Response to Staff in the above captioned matter. In support of this Motion, Bluejacket states as follows:

BACKGROUND

- 1. On March 21, 2025 Staff filed its proposed briefing schedule in the above captioned matter.
- 2. Staff seeks to further delay briefing in this matter until resolution of a matter unrelated to the transfer of the wells to Bluejacket.
- 3. Specifically, staff seeks to delay briefing until a final order is issued in Docket 25-CONS-3040- CMSC (Docket 25-3040).
- 4. Such a delay would significantly prejudice Bluejacket as 1) they are not parties to the unrelated matter and 2) they are currently being harmed by Staff's delay.
- Thus, Bluejacket would propose that Staff submit its prefiled testimony by April
- 6. Respondent and Bluejacket would thus submit their direct and rebuttal testimony by May 2;
 - 7. Staff would then file its rebuttal by June 4.

8. This schedule gives ample time for both resolution of the unrelated matter,

addressing staff's concerns, while simultaneously allowing for the Docket to proceed, addressing

Bluejackets concerns.

WHEREFORE Bluejacket respectfully requests that this Commission issue an Order

approving the above stated timeline and for any other relief that is just and proper.

MCGOWNE LAW OFFICES, P.A.

/s/Christopher J. McGowne

Christopher J. McGowne Atty. Reg. #29056

PO Box 1659

Hays, Kansas 67601

Phone: (720) 878-7688

E-mail: cjmcgowne@mcgownelaw.com

CERTIFICATE OF SERVICE: 25-CONS-3235-CMSC

I, the undersigned, certify that a true and correct copy of the attached Motion has been served to the following by means of first-class mail and electronic service on March 26, 2025.

Richard Dean
BLUEJACKET OPERATING, LLC
4582 S. Ulster St., Ste. 1210
Denver, CO 80237-2633
rich@ranchoil.com

Kelcey Marsh, Litigation Counsel KANSAS CORPORATION COMMISSION 266 N. Main St., Ste. 220 Wichita, KS 67202-1513 Kelcey.marsh@ks.gov

Donnan Steele
DAYLIGHT PETROLEUM, LLC
P.O. Box 52070
Houston, TX 77027-2952
regulatory@daylightpetroleum.com

Deanna Garrison KANSAS CORPORATION COMMISSION 266 N. Main St., Ste. 220 Wichita, KS 67202-1513 deanna.garrison@ks.gov

Jonathan R. Myers, Assist. Litigation Counsel KANSAS CORPORATION COMMISSION 266 N. Main St., Ste. 220 Wichita, KS 67202-1513 jon.myers@ks.gov

Kraig Stoll, EP&R Supervisor KANSAS CORPORATION COMMISSION 266 N. Main St., Ste. 220 kraig.stoll@ks.gov

/s/ Chris McGowne Chris McGowne