

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Pat Apple, Chairman
Shari Feist Albrecht
Jay Scott Emler

In the matter of the notice of denial of license) Docket No.: 17-CONS-3702-CMSC
renewal application issued to Western Frontier)
Adventure, LLC.) CONSERVATION DIVISION
)
) License No.: 35211

MOTION FOR 7-DAY EXTENSION TO STAFF'S DIRECT TESTIMONY DEADLINE

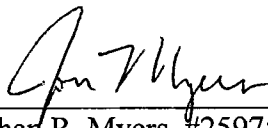
Commission Staff (Staff) of the State Corporation Commission of the State of Kansas (Commission) files this Motion for a seven-day extension to its pre-filed direct testimony deadline. In support of its Motion, Staff states as follows:

1. On June 19, 2017, Staff denied Operator's license renewal application. Operator timely appealed. The matter has been set for a January 18, 2018, evidentiary hearing. Staff's direct testimony is currently due today, Operator's testimony is due December 29, 2017, and rebuttal testimony is due January 8, 2018.

2. There is only one well record that still needs to be resolved for this matter to be fully resolved, and the well in question is scheduled to be dug up this week to determine whether it is plugged. If it is plugged, there is no need for a hearing. Staff would like to delay its pre-filed testimony deadline to December 19, 2017, potentially avoiding the need to file such testimony. Staff has spoken with Operator's counsel, who is not opposed.

WHEREFORE, Staff requests this motion be granted.

Respectfully submitted,

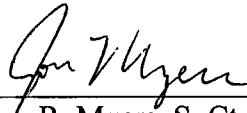


Jonathan R. Myers, #25975
Litigation Counsel, Kansas Corporation Commission
266 N. Main, Suite 220, Wichita, Kansas 67202
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VERIFICATION

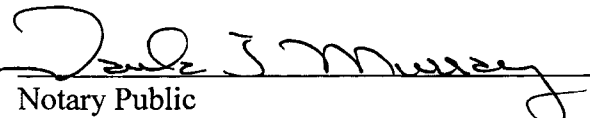
STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

Jonathan R. Myers, of lawful age, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing *Motion*, and attests that the statements therein are true to the best of his knowledge, information and belief.



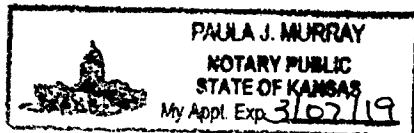
Jonathan R. Myers, S. Ct. #25975
Litigation Counsel
State Corporation Commission
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 11 day of Dec, 2017.



Notary Public

My Appointment Expires: 3/02/19



CERTIFICATE OF SERVICE

I certify that on 12/11/17, I caused a complete and accurate copy of this Motion to be served via United States mail, with the postage prepaid and properly addressed to the following:

Jeffrey A. Wilson
Anderson & Byrd LLP
PO Box 17
Ottawa, KS 66067
Attorneys for Western Frontier Adventure, LLC

and delivered by e-mail to:

Jonathan R. Myers, Litigation Counsel
KCC Central Office

Dustin L. Kirk, Deputy General Counsel
KCC Topeka Office

/s/ Paula J. Murray
Paula J. Murray
Legal Assistant
Kansas Corporation Commission