

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

In the matter of the application of Veem Jade Oil & Gas LLC, for an exception to the 10-year limitation of K.A.R. 82-3-111 for its wells known to the Commission as: the Daves #D21 well, located in Section 27; Smith A #2 well, located in Section 28; and for determination of responsibility for the Smith B #10 and Smith B #12 wells, both located in Section 21, all in Township 29 South, Range 9 East, Elk County, Kansas.)	Docket No.: 18-CONS-3260-CEXC
)	CONSERVATION DIVISION
)	License No.: 32874

MOTION TO DISMISS APPLICATION & CLOSE DOCKET

The Staff of the State Corporation Commission of the State of Kansas (“Staff” and “Commission,” respectively) files this *Motion to Dismiss Application & Close Docket*. In support of its Motion, Staff states as follows:

1. On January 2, 2018, Operator filed an application requesting an exception to the 10-year limit on temporary abandonment status for two wells and requesting a determination of responsibility for two other wells.
2. On March 8, 2018, Operator amended its application, now requesting an exception to the 10-year limit on temporary abandonment status for all four wells.
3. On April 2, 2018, Staff sent Operator a letter, identifying various deficiencies with the application. Staff stated that if the deficiencies were not cured by April 30, 2018, then Staff would file a motion requesting the scheduling of a prehearing conference, in anticipation of Staff recommending denial of the applications. To date, the deficiencies have not been cured.
4. On May 25, 2018, Operator filed a motion in Docket 18-CONS-3221-CPEN, in which it stated, “Operator’s January 2 Application for exception from the 10-year TA limit is

now moot.”¹ Given Operator’s admission that its application in this docket is moot, Staff requests that the application be dismissed and the docket be closed. In the event Operator files a motion in opposition, and the Commission finds the application is not moot, then Staff requests that this matter be set for a prehearing conference.

WHEREFORE, Staff moves for Operator’s application to be dismissed and for this docket to be closed.

Respectfully submitted,



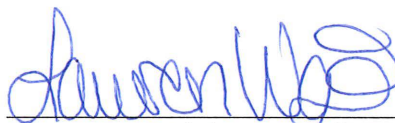
Lauren N. Wright, #27616
Litigation Counsel, Kansas Corporation Commission
266 N. Main, Suite 220, Wichita, Kansas 67202
Phone: 316-337-6200; Fax: 316-337-6211

¹ Second Motion for Order Lifting License Suspension, ¶19.

VERIFICATION

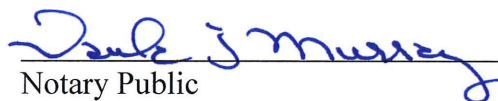
STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

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

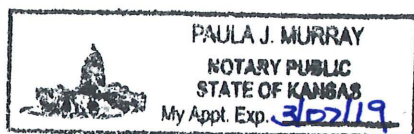


Lauren N. Wright, S. Ct. #27616
Litigation Counsel
State Corporation Commission
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 21 day of June, 2018.


Notary Public

My Appointment Expires: 3/07/19



CERTIFICATE OF SERVICE

18-CONS-3260-CEXC

I, the undersigned, certify that the true copy of the attached Motion has been served to the following parties by means of electronic service on June 21, 2018.

TROY RUSSELL
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 3
137 E. 21ST STREET
CHANUTE, KS 66720
Fax: 785-271-3354
t.russell@kcc.ks.gov

DIANA EDMISTON, EDMISTON LAW OFFICE, LLC
EDMISTON LAW OFFICE LLC
200 E. 1st Street
Suite 301
Wichita, KS 67202
Fax: 316-267-6400
diana@edmistonlawoffice.com

LAUREN WRIGHT, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
Conservation Division
266 N. Main St. Ste. 220
WICHITA, KS 67202-1513
Fax: 316-337-6211
l.wright@kcc.ks.gov

/S/ Paula J. Murray

Paula J. Murray