

AUG 03 2017

CONSERVATION DIVISION
WICHITA, KS

**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 Failure of MEM Partnership)	Docket No. 17-CONS-3398-CPEN
LP, a General Partnership (Operator) to comply)	
with K.A.R. 82-3-111 at the Cooley #1 in Graham)	CONSERVATION DIVISION
County, Kansas.)	License No. 3809

OPERATOR'S RESPONSE TO STAFF'S RESPONSE DATED JULY 25, 2017
ENTITLED "PROPOSED DEFAULT ORDER".

1. The "Proposed Default Order" dated July 25, 2017 above was received by Operator on August 1, 2017 with answer required within a seven (7) days period of time which appears to be a very short response time for a very important document.

2. Again, William Story D/B/A MEM Partnership, LP, does hereby reiterate the fact that Operator is within their rights to respectfully ask to vacate (previously filed) the consideration Order (not a final Order) to hire an unnecessary Kansas attorney to present Operator's relevant information regarding the above Docket to the Commissioner's pursuant to K.S.A. 77-529.

3. Also Operator William Story fervently denies that he continues to engage in the unauthorized practice of law, in which the Commission and KCC Staff accuses him of doing. Operator is neither a corporation nor an artificial person as previously reported by the Operator to the KCC Staff and Commission.

4. Operator William Story, one and the same, fiercely denies the allegations by the KCC Staff that Operator continues to advance legal arguments on behalf of the Operator or for the Operator as shown on page five (5) in paragraph 19 in the above document dated July 25, 2017.

5. Operator is unaware why the KCC Staff or Commission continues to indicate that the undersigned as the Operator is engaged in the unauthorized practice of law.

Operator is only replying to the documents by KCC Staff or Commission in the same form as the Operator receives the documents. If the KCC Staff or Commission is indicating that the Operator is wrongly doing a "Pleading" as the unauthorized practice of law, it does not appear in law that attorneys are the only people who can ask the court for some type of decisions when a person is representing themselves in any court in the State of Kansas.

6. Operator has previously and sufficiently indicated that Operator is not an artificial person as stated in previously filed documents to the KCC Staff and the Commission, and sees no reason to reiterate the facts of an artificial person definition in these continuing documents as shown as a reply on page five (5), paragraph twenty-one (21) in the above document dated July 25, 2017.

7. Also on page five (5), paragraph twenty-one (21), the Commission in the past has already stated their opinion and issued an Order regarding the requirement that the Operator must or may not enter an appearance by a Kansas licensed counsel and the answer by the Commission in that Order is that the Operator is not required to have a Kansas licensed attorney.

8. Therefore the Operator is not in default of K.S.A 2016 Supp.77-520 on page five (5) paragraph twenty-two (22) dated July 25, 2017 and the Operator does hereby file a written motion herein requesting that this Order be vacated and Operator does so within the required seven (7) days and on grounds previous stated pursuant to K.A.R. 82-3-111 and the fact that the Operator has never operated the subject Cooley #1 SWD in Graham County, Kansas and this entire matter pursued by the KCC Staff is without merit.

9. Therefore on page five (5) paragraph twenty-three (23) the motion to vacate has been filed with this document and the Order is not an effective final Order and the Operator's request for a formal hearing with the Commissioner's is in full force and effect and the Operators license shall not be suspended.

10. Also on page five (5) paragraph twenty-three (23), if this above Order goes into effect by the KCC Staff and Commission, whereby the Operator must plug the subject Cooley #1 well (an unauthorized salt water disposal), it appears to the Operator that no court in the State of Kansas would justify this inappropriate Order by the Commission.

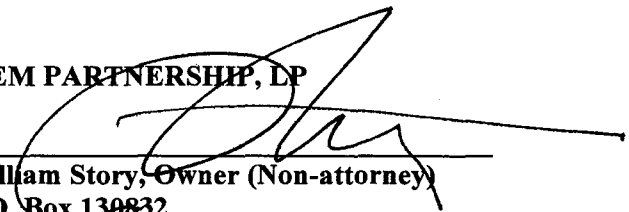
THEREFORE IN CONCLUSION:

- A. The Operator is not in default in any stated Order or any default whatsoever in these continuing proceedings regarding the subject Cooley #1 SWD well in Graham County, Kansas.
- B. Pursuant to K.S.A 77-520(b) Operator has filed within this document the Default Order to be vacated on sufficient grounds as stated above in this document, and on numerous documents filed with the Commission and this request to vacate was completed and filed within the required 7-day period of time.
- C. If for any reason this document is not a sufficient written requirement to vacate this subject above Order dated July 25, 2017, then at that point KCC Staff must alert the Operator if additional notification is required or needed and the Operator will file any and all documents accordingly.

Dated August 1, 2017.

RESPECTFULLY SUBMITTED:

MEM PARTNERSHIP, LP



William Story, Owner (Non-attorney)
P.O. Box 130832
Spring, Texas 77393
Mobile: 936-828-6018
Email: billstory100@gmail.com

Certified mailing date: August 2, 2017 to the Commission at 266 N. Main, Suite 220, Wichita, and Kansas 67202. Mailed original and 7 copies.