

LAW OFFICES OF

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ROBERT A. ANDERSON
(1920-1994)

RICHARD C. BYRD
(1920-2008)

July 11, 2017

via e-filing EXPRESS

Ms. Lynn M. Retz, Secretary
Kansas Corporation Commission
1500 S. W. Arrowhead Road
Topeka, Kansas 66604-4027

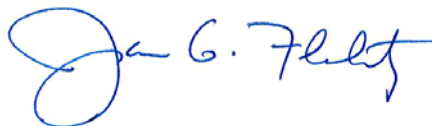
Re: Global Energy Solutions Inc. ("Global Energy")
Docket No. 17-CONS-3697-CPEN

Dear Ms. Retz:

Enclosed is a copy of the correspondence referred to in Global Energy's Request for Hearing (paragraph 6) filed in the above captioned docket on July 7, 2017, to also be filed in this docket.

If you have any questions or comments, let me know. Thank you.

Sincerely,



James G. Flaherty
jflaherty@andersonbyrd.com

JGF:rr

Enclosure

cc: Joshua D. Wright
Michael J. Duenes

James Flaherty

From: James Flaherty
Sent: Thursday, June 15, 2017 3:20 PM
To: 'c.maine@kcc.ks.gov'
Cc: 'j.wright@kcc.ks.gov'
Subject: Global Energy Solutions Inc. License 32316
Attachments: Letter to KCC-Global.pdf

Attached is letter being submitted on behalf of Global Energy Solutions Inc. in response to Notice of Violation submitted by KCC dated June 1, 2017.

Let me know if you have any questions. Thanks.

James G. Flaherty
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June 15, 2017

Sent by electronic mail c.maine@kcc.ks.gov

Ms. Cynthia K. Maine
Administrative Assistant
Kansas Corporation Commission
Conservation Division
266 N. Main Street, Suite 220
Wichita, Kansas 67202

Re: Global Energy Solutions Inc. ("Global Energy") License #32316; Response
to Notice of Violation dated June 1, 2017

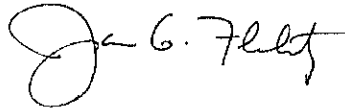
Dear Ms. Maine:

Global Energy asked us to respond to the above-referenced notice of violation it received from you which effectively conditioned Global Energy's request to renew its operator's license upon accepting responsibility for plugging some wells that Global Energy does not believe that it has any responsibility for plugging. Global Energy wishes to renew its operator's license in a timely manner. However, in doing so it is not willing to accept responsibility for plugging some of the wells identified and listed in the Notice of Violation that Global Energy does not believe that it has responsibility to plug as a condition to renewal of its license. The pre-condition placed upon Global Energy's renewal of its operator's license is unreasonable and unlawful and effectively results in a denial of Global Energy's renewal of its operator's license. Accordingly, on behalf of Global Energy, we would request that the Commission either remove those unplugged wells that Global Energy is not responsible for plugging from the pre-condition to the license renewal, or in the alternative, even though no docket has been filed regarding this matter, Global Energy requests a hearing on the effective denial of the Commission to renew Global Energy's license and the notice of violation sent by your office. If an order is issued opening a formal docket on this matter I would request receiving a copy of that order.

The wells on the list that was provided to Global Energy with the Notice of Violation that Global Energy believes that it has no responsibility for plugging are as follows: Decker 2; Coppinger 1 and 3; Wilmer Kimmel 1-87; Kimmel Wilmer 1-89; Fuhr 1 and 103; Demoranville 6 (COG 104); Demoranville (COG 105);and Demoranville 8 (COG 106).

I am providing a copy of this letter and request for hearing to Mr. Joshua Wright. I would be happy to discuss this matter with you or Mr. Wright in an effort to resolve this matter so Global Energy can submit its license renewal, or to answer any questions regarding the position being taken by Global Energy with respect to the above mentioned wells.

Sincerely,

A handwritten signature in black ink, appearing to read "J. G. Flaherty". The signature is fluid and cursive, with a large initial "J" and a stylized "G".

James G. Flaherty
jflaherty@andersonbyrd.com

JGF:tlc

cc: Joshua Wright (j.wright@kcc.ks.gov)