2017-11-16 10:24:58 Kansas Corporation Commission /s/ Lynn M. Retz

## THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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Before Commissioners:

Pat Apple, Chairman Shari Feist Albrecht Jay Scott Emler

In the matter of an Order to Show Cause issued to C N B Enterprises ("Operator") regarding responsibility under K.S.A. 55-179 for unplugged wells on an expired license. Docket No.: 18-CONS-3096-CSHO CONSERVATION DIVISION

License No.: 31394

## **MOTION TO RESCHEDULE PREHEARING CONFERENCE**

Commission Staff (Staff) of the State Corporation Commission of the State of Kansas (Commission) files this Motion. In support of its Motion, Staff states as follows:

1. On August 18, 2017, Commission Staff filed a Motion to Show Cause against

Operator, due to three unplugged wells remaining on Operator's expired license. On October 19,

2017, the Commission issued an order, setting a November 14, 2017, prehearing conference.

2. At the November 14, 2017 prehearing conference, Staff noted that one of the

partners of Operator is a debtor in a pending bankruptcy case. Out of an abundance of caution, Staff requests that the prehearing conference be rescheduled for the third week of January 2018, at a date and time of the prehearing officer's choosing, to facilitate further conversation between Staff and Operator regarding how to best resolve this Commission docket, and to determine whether the outcome should be affected by the bankruptcy proceeding.

WHEREFORE, Staff requests this motion be granted.

Respectfully submitted,

Jonathan R. Myers, #25975

Jonathan R. Myers, #25975 Litigation Counsel Kansas Corporation Commission 266 N. Main, Suite 220, Wichita, Kansas 67202 Phone: 316-337-6200; Fax: 316-337-6211

## 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

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

SUBSCRIBED AND SWORN to before me this <u>16</u> day of <u>100</u>, 2017.

Muera Notary Public

My Appointment Expires: 307/19

PAULA J. MURRAY

## **CERTIFICATE OF SERVICE**

I certify that on \_\_\_\_\_\_, 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:

David Prelle Eron Eron Law 229 E. William, Suite 100 Wichita, KS 67202

and delivered by e-mail to:

Jonathan R. Myers, Litigation Counsel KCC Central Office

Michael J. Duenes, Assistant General Counsel KCC Topeka Office

<u>/s/ Paula J. Murray</u> Paula J. Murray Legal Assistant Kansas Corporation Commission