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KANSAS CORPORATION COMMISSION

JAN 23 2014

LEGAL SECTION

BEFORE THE
STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chair
Thomas E. Wright
Jay Emler

In the Matter of the Order to Show Cause)	Docket No. 14-CONS-234-CPEN
issued to B-C Steel, LLC ("Operator"))	
regarding compliance with K.A.R. 82-3-111)	CONSERVATION DIVISION
at the Ankrom #1, Ankrom #5, Ankrom #6,)	
Ankrom #7, and Ankrom #8 wells in Cowley)	License No. 33711
County, Kansas.)	

MOTION TO JOIN PARTIES AND CONTINUE THE HEARING

COMES NOW B-C Steel, LLC, by and through its attorneys, Timothy E. McKee and Amy Fellows Cline of Triplett, Woolf & Garretson, LLC, and moves to join Cudd Operating Corp. ("Cudd") and Ronnie Whiteman d/b/a Gen-Dor Oil Co. ("Whiteman") as parties to the Commission's Penalty Order issued in this docket regarding well plugging responsibility on the Ankrom lease located in Cowley County, Kansas and to continue the hearing that is currently scheduled for February 21, 2014. In support of its motion, B-C Steel, LLC offers the following:

1. The Ankrom lease at issue in this matter was taken on July 17, 1953. It includes Lots 1, 2, and 3 and the South Half of the Northeast Quarter and the Southeast Quarter of the Northwest Quarter of Section 3, Township 32 South Range 7 East in Cowley County. Kansas Geological Survey (KGS) records indicate five wells were drilled on the Ankrom lease, in 1955 (Ankrom #1), 1973 (Ankrom #5), 1976 (Ankrom #6), 1978 (Ankrom #7), and 1984 (Ankrom #8).

2. Cudd took over operation of the Ankrom lease on or around July 1, 2002. According to Kansas Geological Survey (KGS) records, the five wells on the Ankrom lease produced approximately 314 barrels of oil in 2002, 143 barrels of oil in 2003, and 20 barrels of oil in 2004. KGS does not report any production from this lease after 2004.

3. On or around March 1, 2007, Whiteman took over operations of the Ankrom lease. B-C Steel, LLC understands Whiteman received rights to the Ankrom lease for a period of three years. B-C Steel, LLC also understands Whiteman removed equipment from the wells on the Ankrom lease.

4. In 2009, B-C Steel, LLC purchased the rights to the Ankrom lease from Whiteman for the one year that remained on the three-year term taken by Whiteman. B-C Steel, LLC acquired these lease rights for the purpose of potentially drilling new wells on the Ankrom lease if wells it planned to drill to the south of the Ankrom lease were successful. B-C Steel, LLC never physically entered onto the land covered by the Ankrom lease for any purpose. After the expiration of the one year term that it acquired, B-C Steel, LLC executed a release of the Ankrom lease.

5. These facts necessitate joining Cudd and Whiteman as necessary parties to this matter to determine the party or parties responsible for plugging the five wells at issue in this matter.

6. B-C Steel, LLC further moves for a continuance of the hearing currently scheduled for February 21, 2014, to allow sufficient time for the development of the necessary facts and notice.

WHEREFORE, B-C Steel, LLC prays that the Commission grant its motion in this matter and join Cudd and Whiteman as parties and continue the hearing scheduled for February 21, 2014.

Respectfully submitted,

TRIPLETT, WOOLF & GARRETSON, LLC

By 

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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF *Woodson*)

Bert Carlson, of lawful age, being first duly sworn, upon oath states: I am a duly-authorized representative of B-C Steel, LLC, and I have read the above Motion to Join Parties and Continue the Hearing, know the contents and know that the statements made therein are true and correct, to the best of my knowledge and belief.

Bert Carlson

Bert Carlson

Subscribed and sworn to before me this 23 day of January, 2014



Catherine Carlson

NOTARY PUBLIC

My appointment expires: *August 9, 2014*

CERTIFICATE OF SERVICE


I hereby certify that on this 23rd day of January, 2014, the original and seven copies of the above Motion to Join Parties and Continue the Hearing were hand-delivered to:

Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission
130 S. Market, Room 2078
Wichita, KS 67202

and a true and correct copy sent via United States Mail, postage prepaid, and addressed as follows:

Cudd Operating Corp.
6305 Waterford Blvd., Ste 130
Oklahoma City, OK 73118

Ronnie Whiteman d/b/a/ Gen-Dor Oil. Co.
8135 281st Rd
Cambridge, Kansas 67023



Timothy E. McKee