

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

In the Matter of the Application of John Douglas Pitman Revocable Trust ("Operator") for an Operator's License Renewal.)))))	Docket No: 18-CONS-3212-CMSC CONSERVATION DIVISION License No. 33991
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MOTION TO RESCIND ORDER DENYING APPLICATION FOR LICENSE

The Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission," respectively) files this *Motion to Rescind Order Denying Application for License*. In support of its Motion, Staff states as follows:

1. On August 27, 2017, Operator submitted an application for license renewal.
2. On November 16, 2017, the Commission issued an Order Denying Application for License, based upon Staff's determination that the application did not meet the requirements of K.S.A. 55-155 and K.A.R. 82-3-120. Specifically, the application did not satisfy K.S.A. 55-155(c)(4) as available records demonstrated Operator was associated with John Pitman Estate, License #8704, which was an operator out of compliance with K.S.A. Chapter 55.
3. On November 28, 2017, Operator timely requested a hearing. The matter was set for a January 5, 2018, prehearing conference, subsequently continued to March 2, 2018.
4. Subsequent to January 5, 2018, John Pitman Estate, License #8704, was brought into compliance with Commission statutes and regulations.¹ Accordingly, the underlying basis for denial of Operator's license has been resolved. Staff has concluded that Operator's application now meets the requirements of K.S.A. 55-155 and K.A.R. 82-3-120. Therefore, Staff requests the Commission rescind its November 16, 2017 Order Denying Application for License.

¹ Specifically, the Blasi #G-1, API #15-125-29002, an unplugged well remaining on John Pitman Estate's expired license, was plugged on January 25, 2018.

5. Should the Commission rescind its November 16, 2017 Order Denying Application for License, all matters pertaining to Operator will be resolved, Staff will process the license renewal application, and this docket can be closed.

WHEREFORE, Staff respectfully moves the Commission rescind its November 16, 2017 Order Denying Application for License and close this docket.

Respectfully submitted,




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

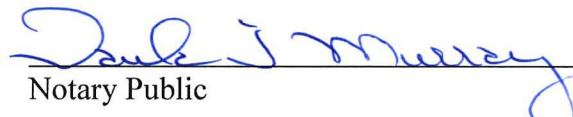
STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

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.



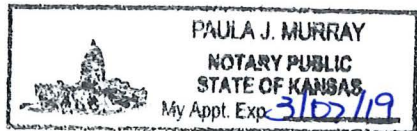
Jonathan R. Myers, S. Ct. #25975
Litigation Counsel
State Corporation Commission
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 7 day of FEB, 2018.



Notary Public

My Appointment Expires: 3/07/19



CERTIFICATE OF SERVICE

I certify that on 2/7/18, 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:

J. R. Horst
PO Box 560
Caney, KS 67333
Attorneys for John Douglas Pitman Revocable Trust

and delivered by e-mail to:

Jonathan R. Myers, Litigation Counsel
KCC Central Office

Samuel Feather, Deputy General Counsel
KCC Topeka Office

/s/ Paula J. Murray
Paula J. Murray
Legal Assistant
Kansas Corporation Commission