

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

In the Matter of the Application of)	Docket No.: 22-CONS-3473-CMSC
KanOK Energy, LLC (Operator) for an)	
Operator's License Renewal.)	CONSERVATION DIVISION
)	
_____)	License No.: 35428

**REPLY TO STAFF'S RESPONSE TO MOTION TO
REVISE SCHEDULING ORDER**

COMES NOW KanOK Energy, LLC by and through its counsel of record Charles C. Steincamp of Depew Gillen Rathbun & McInteer, LC, and submits this reply to the Staff's response.

1. Staff's Pre-filed Testimony attributes ten (10) separate alleged suspensions of KanOK Energy, LLC's license in support of its Pre-filed Testimony as part of the testimony of Kenny Sullivan. Those alleged violations and suspensions start on May 26, 2017.

2. KanOK Energy, LLC commenced its corporate existence on February 26, 2021, and filed an Application for Registration of a Foreign Covered Entity to do business in Kansas on March 16, 2021. All but two (2) of the alleged violations contained in Staff's Pre-filed Testimony occurred prior to the legal existence of KanOK Energy, LLC.

3. Staff's Pre-filed Testimony offers no explanation for this other than a footnote on the Exhibit which reads, "Operator was operating under the name Vince Coble dba Derrick Resources, Inc. when the Commission issued this order. Operator changed its name to KanOK Energy, LLC on March 25, 2021, but it's license number remained the same."

4. KanOK Energy, LLC has drafted and sent discovery requests to KCC counsel requesting copies of documents concerning the alleged violations from the time prior to the existence of KanOK Energy, LLC.

5. Counsel for the operator will be out of the office on October 4, 2022 through October 14, 2022, on a trip which was originally scheduled in October, 2020. Counsel for operator will be undergoing eye surgery on October 20, 2022. Assuming such surgery is successful, counsel expects to be back in the office on October 24, 2022.

6. Several questions are raised by Staff's Pre-filed Testimony.

- A. KAR 82-3-120 does not contain a provision allowing transfer of an operator's license between separate entities.
- B. It appears that the operator that a number of the dockets relate to is Vince Coble dba Derrick Resources, Inc. Vince Coble is an individual. KanOK Energy, LLC is a new Oklahoma limited liability company and is not a name change for either Vince Coble or Derrick Resources, Inc.
- C. It seems unusual that the Commission would treat a transfer of a license from an individual to a limited liability company from out of state as a name change under the circumstances.

7. These issues and Schedule of counsel for the operator are the basis for operator's request for the extension set out in the Motion.

THEREFORE, for the reasons stated in the Motion and as set out above, operator asks that the Schedule be extended as requested in its Motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 15th day of September, 2022, the foregoing *Reply to Staff's Response to Motion to Revise Scheduling Order* by Applicant KanOK Energy, LLC was served to the following by means of electronic service.

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