

SEP 18 2017

CONSERVATION DIVISION  
WICHITA, KS

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

Before Commissioners: Pat Apple, Chairman  
Shari Feist Albrecht  
Jay Scott Emler

In the Matter of the Failure of MEM Partnership	)	Docket No. 17-CONS-3398-CPEN
LP, a General Partnership (Operator) to comply	)	
with K.A.R. 82-3-111 at the Cooley #1 in Graham	)	CONSERVATION DIVISION
County, Kansas.	)	License No. 3809

**MOTION TO REQUEST A HEARINGS PRIOR  
TO COMMISSION SUSPENDING LICENSE**

The Commission has stated in an Order dated August 17, 2017 that Operator's license of 28 years will be suspended without further notice, on September 17, 2017. This suspension will occur without an independence Hearing with the above Commissioners. The Commission's action will eliminate Operator's livelihood without the normal substantial evidentiary requirements that a Hearing would require.


Operator has respectfully and repeatedly requested a Hearing on this Docket since January 9, 2017, without success, which would prove or invalidate Commission's allegations.

Commission has alleged that Operator is in Default and created this suspension of Operator's license. Operator has respectfully denied this Default in several past Motions and also in a Motion dated September 13, 2017.

WHEREFORE, Operator respectfully requests that Operator's license not be suspended in Commission's Order dated August 17, 2017 and Order declared null and void.

Dated: September 15, 2017, with original and 7 copies sent to KCC in Wichita, KS.

Respectfully submitted,

  
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William Story, Pro Se, Owner of  
MEM Partnership, LP  
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