

FEB 07 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 ADDITIONAL PARTY

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 B. Keaton Cudd, III as a party to the Commission's Penalty Order issued in this docket regarding well plugging responsibility on the Ankrom lease located in Cowley County, Kansas. In support of its motion, B-C Steel, LLC offers the following:

1. On January 23, 2014, B-C Steel, LLC filed a motion to join parties Cudd Operating Corp. and Ronnie Whiteman d/b/a Gen-Dor Oil Co. ("Whiteman") and continue the hearing scheduled in this matter. B-C Steel, LLC served this motion by mail on Cudd Operating Corp. and Whiteman.

2. B-C Steel, LLC subsequently received a copy of the Certificate of Dissolution of Cudd Operating, Corp. attached hereto as Exhibit A by mail. This Certificate identifies B. Keaton Cudd, III as the registered agent, President, and apparently sole officer and director of Cudd Operating Corp.

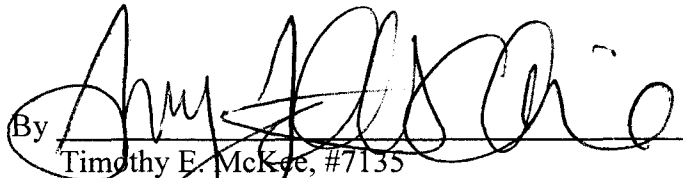
3. Pursuant to K.S.A. § 17-701, B. Keaton Cudd, III may be liable for well plugging responsibility. Given the apparent dissolution of Cudd Operating Corp., presumably signifying that Cudd Operating Corp. has insufficient assets to satisfy any judgment rendering it liable for well plugging responsibility in this matter, compliance with K.S.A. § 17-701(b) is unnecessary and futile. *See State ex rel. Graeber v. Marion County Landfill, Inc.*, 276 Kan. 328, 354, 76 P.3d 1000, 1017 (2003).

4. Joinder of B. Keaton Cudd, III is necessary to prevent injustice and the equities of the situation support such joinder.

WHEREFORE, B-C Steel, LLC prays that the Commission grant its motion in this matter and join B. Keaton Cudd, III as an additional party in this matter.

Respectfully submitted,

TRIPLETT, WOOLF & GARRETSON, LLC

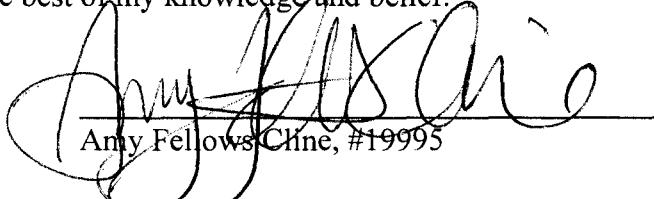
By 

Timothy E. McKee, #7135
Amy Fellows Cline, #19995
2959 N. Rock Road, Suite 300
Wichita, Kansas 67226
Telephone: (316) 630-8100
Facsimile: (316) 630-8101
E-mail: temckee@twgfirm.com
amycline@twgfirm.com
Attorneys for Operator B-C Steel, LLC

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Amy Fellows Cline, of lawful age, being first duly sworn, upon oath states: I one of the attorneys entered in this matter on behalf of B-C Steel, LLC, and I have read the above Motion to Join Additional Party, know the contents and know that the statements made therein are true and correct, to the best of my knowledge and belief.



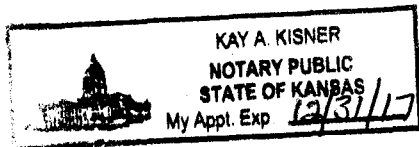
Amy Fellows Cline, #19995

Subscribed and sworn to before me this 7th day of February, 2014.



NOTARY PUBLIC

My appointment expires:



CERTIFICATE OF SERVICE

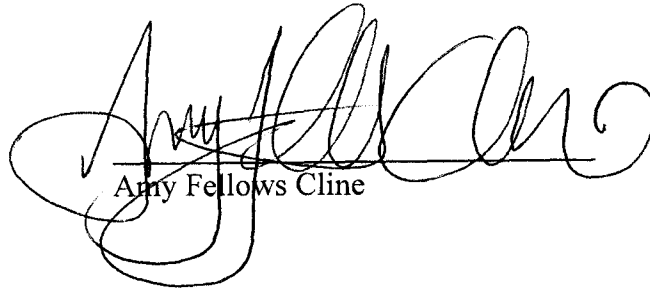
I hereby certify that on this 7th day of February, 2014, the original and seven copies of the above Motion to Join Additional Party were hand-delivered to:

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:

B. Keaton Cudd, III &
Cudd Operating Corp.
6305 Waterford Blvd., Ste 130
Oklahoma City, OK 73119

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


Amy Fellows Cline

OFFICE OF THE SECRETARY OF STATE



CERTIFICATE OF DISSOLUTION

WHEREAS, a Certificate of Dissolution of

CUDD OPERATING CORP.

an Oklahoma corporation has been filed in the office of the Secretary of State as provided by the laws of the State of Oklahoma.

NOW THEREFORE, I, the undersigned Secretary of State of the State of Oklahoma, by virtue of the powers vested in me by law, do hereby issue this Certificate of Dissolution evidencing such filing.

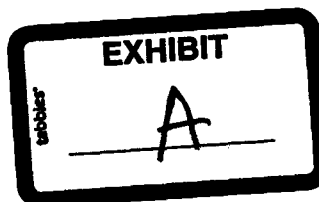
IN TESTIMONY WHEREOF, I have hereunto set my hand and caused to be affixed, the Great Seal of the State of Oklahoma.



*Filed in the city of Oklahoma City this
26th day of March, 2012.*

V. Dorn-Coffey

Secretary of State



03/26/2012 11:15 AM

OKLAHOMA SECRETARY OF STATE



18861730002

OKLAHOMA CERTIFICATE OF DISSOLUTION

TO: OKLAHOMA SECRETARY OF STATE
2300 N. Lincoln Blvd., Room 101, State Capitol Building
Oklahoma City, Oklahoma 73105-4897
(405) 521-3912

The undersigned, for the purpose of dissolving said corporation pursuant to Section 1096 of the Oklahoma General Corporation Act, hereby certifies:

1. The name of the corporation is:

CUDO OPERATING CORP.

2. The date of incorporation of such corporation is:

SEPTEMBER 3, 1991

3. The name of its registered agent and the street address of its registered office in the State of Oklahoma is:

<u>B. KENTON CUDO, III</u>	<u>6305 WATERFORD BLVD, #130</u>	<u>OK CITY</u>	<u>OK</u>	<u>73118</u>
Name	Street Address	City	County	Zip Code

(P.O. BOXES ARE NOT ACCEPTABLE)

4. The date dissolution was authorized:

MARCH 31, 2011

5. Check the applicable statement:

☐ The dissolution has been authorized by the board of directors and shareholders of the corporation in accordance with subsections A & B of Section 1096.

OR

☒ The dissolution has been authorized by all of the shareholders of the corporation entitled to vote on a dissolution in accordance with subsection C of Section 1096.

RECEIVED

MAR 26 2012

OKLAHOMA SECRETARY
OF STATE

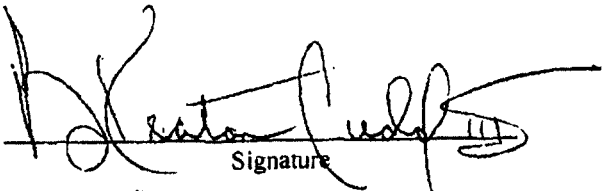
6. The names and addresses of its officers are:

	NAME	ADDRESS	CITY	STATE	ZIP CODE
PRESIDENT	<u>B. KEATON CUDD, III 6305 WATERFORD BLVD, STE. 130 OK CITY, OK 73119</u>				
VICE PRESIDENT	_____				
SECRETARY	_____				
ASST. SECRETARY	_____				
TREASURER	_____				

7. The names and addresses of its directors, if any, are:

	NAME	ADDRESS	CITY	STATE	ZIP CODE
DIRECTOR	<u>B. KEATON CUDD, III 6305 WATERFORD BLVD, STE. 130 OK CITY, OK 73119</u>				
DIRECTOR	_____				
DIRECTOR	_____				

IN WITNESS WHEREOF, said corporation has caused this certificate of dissolution to be executed this 20th day of MARCH, 2012.


Signature
List Title PRESIDENT
B. KEATON CUDD, III
Type or Print Name

ATTEST:


Signature

List Title ASST.
GUILA M. STOCKER
Type or Print Name



OKLAHOMA SECRETARY OF STATE

V. Glenn Coffee
Secretary of State

2300 N. Lincoln Blvd., Room 101
Oklahoma City, OK 73105-4897

Mary Fallin
Governor

March 28, 2012

STATEMENT

Page 1 of 1

PETRO-VENTURES, INC.
6305 WATERFORD BLVD STE. 130
OKLAHOMA CITY OK 73118

Client ID: 136254778

Process Date: 3/28/12

Receive Date: 3/26/12

Document Number	Document Detail	Filing Number	Entity Name	Page Count	Fee
18861730002	Certificate of Dissolution	1900504132	CUDD OPERATING CORP.		\$50.00

Total Document Fees \$50.00

Payment Type	Payment Status	Payment Reference	Amount
Check	Retained	1229	\$50.00
Total Payments Received			\$50.00
Total Amount Charged to Client Account			\$0.00
Total Amount Credited to Client Account			\$0.00

Note: Total Amount Credited to Client Account will be refunded within 15 days of receipt of written request.

Evidence of Filed Document(s) or Orders(s) requested is enclosed.

Please include Client ID number on all correspondence.