

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the matter of the application of Quito,) Docket No. 24-CONS-3338-CEXC
Inc. for an exception to the 10-year time)
limitation of K. A. R. 82-3-111 for its Tom) CONSERVATION DIVISION
Appleby #1 well located in the NW/4 of)
Section 30-33S-11E, Chautauqua County,) License No. 33594
Kansas.)

In the matter of the application of Quito,) Docket No. 24-CONS-3359-CEXC
Inc. for an exception to the 10-year time)
limitation of K. A. R. 82-3-111 for its Tom) CONSERVATION DIVISION
Appleby #5 well located in Section)
30-33S-11E, Chautauqua County, Kansas.) License No. 33594

MOTION TO VACATE PROPOSED
DEFAULT ORDER

COMES NOW Quito, Inc., and for its Motion to Vacate proposed Default Order,
shows as follows:

1. Due to a clerical staff shortage, Quito, Inc. ("Quito") was not aware of the June 27, 2024 prehearing conference.
2. Quito has applied for a new operator's license. The license has not been issued to date due to concerns expressed by KCC staff in a letter raising concerns over entities which staff believe are or were associated with Quito. K.S.A. 55-155 (d) (3) relates to an operator's financial assurance, and is not a basis for denial of or refusal to issue an operator's license.

3. Quito has requested a hearing on the asserted failure to plug in Docket No. 24-CONS-3072-CPEN. Issuance of a new license as applied for by Quito and transfer of the wells to the new license would satisfy the Commission's Order in that Docket.

WHEREFORE, Quito, Inc. moves that the proposed Default Order be vacated.

JOHN R. HORST, P.A.

By: /s/ John R. Horst
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File No. 2844
S. Ct. #09412

CERTIFICATE OF SERVICE

24-CONS-3338-CEXC, 24-CONS-3359-CEXC

I, the undersigned, certify that a true copy of the attached Motion to Vacate proposed Default Order has been served to the following by means of electronic service on August 1, 2024.

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