

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

In the Matter of a Compliance Agreement between) Docket No.: 16-CONS-3876-CSMC
Steven A. Leis and Commission Staff regarding)
bringing the twenty-eight wells in Woodson County) CONSERVATION DIVISION
into compliance with K.A.R. 82-3-111)
) License No. 33900

MOTION FOR ADDITIONAL TIME OR
RELEASE FROM OBLIGATION

COMES NOW Steven A. Leis and does move the Commission for an order extending his time to plug the wells located on the land belonging to L.D. and Cheryl McCormick.

Steven A. Leis does advise the Commission that he has repeatedly requested permission to enter into and upon the land owned by the McCormicks for the express purpose of plugging the wells for which he has agreed to do.

Steven A. Leis further advises the Commission that he has provided to the McCormicks a certificate of insurance showing that he has insurance, both liability and workers compensation.

Still, the McCormicks have refused to accept said certificate of insurance and have made demands upon Steven A. Leis, namely that he name them as additional insureds under his liability policy.

Steven A. Leis advises the Commission that with all of the people he has worked with a certificate of insurance was adequate and the request that the McCormicks be added as additional insureds under his policy is unreasonable and unwarranted.

Further, Steven A. Leis advises the Commission that he has now found it necessary

to file a motion in the Woodson County District Court to restrain the McCormicks from interfering with his obligation to plug the wells as has been ordered by this Commission.

Steven A. Leis attaches hereto a copy of the motion which has been filed.

ALTERNATE PRAYER

Steven A. Leis does request that it would appropriate for this Commission to release him of any obligation to plug the wells located on the McCormicks land and assign the obligation to L.D. and Cheryl McCormick.

WHEREFORE, Steven A. Leis prays that this Motion to be set for a hearing and the Commission continue for at least sixty (60) days his obligation for the initial plugging of the wells located upon the McCormicks property.

In the alternative, Steven A. Leis prays that this Commission release him of any obligation to plug the wells which are located on the McCormick property and to direct L.D. and Cheryl McCormick to assume the obligation to plug said wells.

Steven A. Leis requests such other and further relief as he is entitled to in both law and equity.

Respectfully Submitted:

/s/ Stanley R. Ausemus

Stanley R. Ausemus #05967

STANLEY R. AUSEMUS, CHARTERED

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Attorney for Steven A. Leis

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above and foregoing Motion by Steven A. Leis was served on the following by placing a copy of the same in the United States mail, postage prepaid, or sent via facsimile:

Original to: Agency Head
Kansas Corporation Commission
Conservation Division
266 North Main, Suite 220
Wichita, Kansas 67202
Fax 316 337-6211

With copies to the following:

Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission
266 North Main, Suite 220
Wichita, Kansas 67202

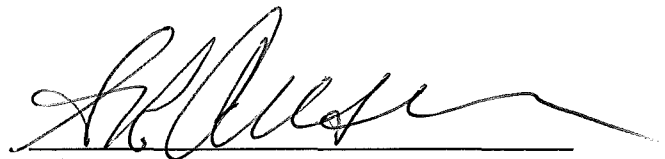
John Almond
Kansas Corporation Commission
Conservation Division - District 3 Office
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Chanute, Kansas 66720

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Steven A. Leis
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this 20th day of March, 2017.



Stanley R. Ausemus #05967
Attorney for Steven A. Leis