

KCC WICHITA

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Kansas Corporation Commission  
/S/ Nessa Thomas

THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the matter of an Order to Show Cause issued to )	Docket No. 15-CONS-272-CSHO
Red Cloud Exploration Operating LLC, Global )	
Energy Solutions Inc., and N. R. Hamm Contractor )	CONSERVATION DIVISION
LLC regarding responsibility under K.S.A. 55-179 )	
for plugging 4 wells on the Heck lease in Jefferson )	License Nos. 34224
County, Kansas. )	32316
_____ )	6192

MOTION FOR CONTINUANCE

COMES NOW, respondent Red Cloud Exploration Operating LLC, and requests that the hearing in this docket, currently scheduled for February 19, 2015, be continued approximately thirty (30) days, to March 19, 2015, with prehearing deadlines for prefiled testimony adjusted accordingly.

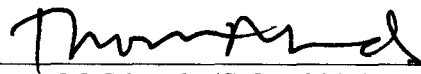
In support of its motion, respondent states that it has agreed to accept responsibility for the subject wells, has acquired lease rights to the land on which the subject wells are located, and that additional time is required to arrange for acquisition of labor and equipment necessary to restore the wells to production or plug them. Granting of this motion should provide sufficient time to resolve this matter to the satisfaction of the Commission and avoid the need for a hearing.

Respondent has conferred with counsel for the other parties, who have no objection to the continuance requested

WHEREFORE, respondent prays that the Commission grant its motion for continuance, together with such other and further relief as the Commission may deem just and proper.

Respectfully submitted,

GLAVES, IRBY AND RHOADS

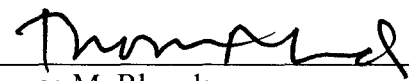
By:   
Thomas M. Rhoads (S.C. 10005)  
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Wichita, Kansas 67202-1829  
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Attorneys for Respondent,  
Red Cloud Exploration Operating LLC

VERIFICATION

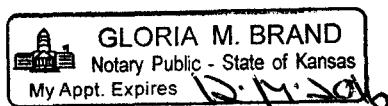
STATE OF KANSAS            )  
                                      ) SS:  
COUNTY OF SEDGWICK    )

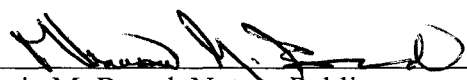
Thomas M. Rhoads, of lawful age and being first duly sworn upon his oath, deposes and states: That he is the Attorney for Respondent Red Cloud Exploration Operating LLC in the above-captioned action; that he has read the above and foregoing Motion for Continuance, knows and understands the contents thereof, and states that the statements and allegations therein contained are true and correct according to his knowledge, information, and belief.

  
Thomas M. Rhoads

SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 3rd day of February, 2015.

My commission expires:



  
Gloria M. Brand, Notary Public

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 3 day of February, 2015, he caused true and correct copies of the above and foregoing Motion for Continuance to be served by hand delivery upon the following:

Jonathan R. Myers, Litigation Counsel  
Lane Palmateer, Litigation Counsel  
Kansas Corporation Commission,  
Conservation Division  
266 N. Main Street, Suite 220  
Wichita, Kansas 67202-1513

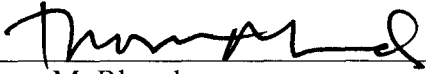
and by depositing the same in the United States mail, postage prepaid, addressed to:

James G. Flaherty  
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216 S. Hickory, P. O. Box 17  
Ottawa, Kansas 66067

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Attorneys for Respondent,  
N. R. Hamm Contractor, LLC

  
\_\_\_\_\_  
Thomas M. Rhoads