From: FOLAND WICKENS

03/06/2012 16:26

#394 P. 011/015

RECEIVED KANSAS CORPORATION COMMISSION

MAR 06 2012

CONSERVATION DIVISION WICHITA, KS

2012:03:07 13:41:07 Kansas Corporation Commission /S/ Patrice Petersen-Klein

THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners:

Mark Sievers, Chairman

Ward Loyd

Thomas E. Wright

In the matter of an Order to Show Cause on) the Commission's own Motion issued to) Osborn Energy, L.L.C. and Central States) Energy LLC., with regard to responsibility) under K.S.A. 55-179 for plugging the Adams) Lease in Section 12, Township 15 South,) Range 24 East, Johnson County, Kansas)

Docket No. 12-CONS-152-CSHO

CONSERVATION DIVISION

License No. 32294 (expired) 34570

MOTION FOR CONTINUANCE OF HEARING

Central States Energy, L.L.C. ("CSE"), by and through its attorney of record, Jacqueline M. Sexton of Foland, Wickens, Eisfelder, Roper & Hofer, P.C., respectfully moves the State Corporation Commission of Kansas ("Commission" or "KCC") to continue the hearing currently set for March 15, 2012 at 10:00 a.m. to the May docket. In support of its motion, CSE states as follows:

- 1. Counsel for CSE was retained on March 2, 2012. Counsel for CSE is not available for the hearing on March 2, 2012 due to a scheduling conflict. Additionally, counsel for CSE needs additional time to meet with its client and prepare for the hearing in this matter, including the preparation and submission of pre-filed testimony.
- 2. On March 2, 2012, counsel for CSE spoke with John McCannon, litigation counsel for KCC. Counsel for CSE requested that Mr. McCannon agree to continue the hearing currently scheduled for March 15, 2012 to the April docket.
- 3. Mr. McCannon informed counsel for CSE that he would agree to continue the hearing, but stated that he was not available for a hearing in April. Mr. McCannon stated that in light of his unavailability in April, he would agree to continue the hearing to the May docket.

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4. No prior continuances have been requested by CSE.

5. This request for a continuance is not sought to cause prejudice to any party or to cause the undue delay of the hearing in this matter, but is necessary due to a scheduling conflict and to permit

newly-retained counsel to meet with its client and prepare for the hearing.

6. In light of the foregoing, CSE respectfully requests that the Commission continue the

hearing currently set for March 15, 2012 to the May docket.

7. A proposed form of Order is attached hereto as Exhibit A.

WHEREFORE, Central States Energy, LLC prays that the State Corporation Commission of

Kansas continue the hearing currently set for March 15, 2012 to the May docket.

Respectfully submitted,

FOLAND, WICKENS, EISFELDER, ROPER & HOFER, P.C.

Jacqueline M. Sexton

#19878

3000 Commerce Tower, 911 Main Street

Kansas City, Missouri 64105 Telephone: (816) 472-7474 Facsimile: (816) 472-6262 Email: jsexton@fwpclaw.com

Attorney for Central States Energy, L.L.C.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 6th day of March, 2012, a true and accurate copy of the foregoing was served via U.S. Mail, postage prepaid, upon:

John McCannon Litigation Counsel Kansas Corporation Commission Finney State Office Building 130 S. Market, Suite 2078 Wichita, Kansas 67202-3802 From: FOLAND WICKENS 03/06/2012 16:26 #394 P. 013/015

John Almond KCC District 3 1500 W. 7th Street Chanute, Kansas 66720

Robert Jenkins
Well Plugging Coordinator
Kansas Corporation Commission
Finney State Office Building
130 S. Market, Suite 2078
Wichita, Kansas 67202-3802

Jim Osborn Osborn Energy, L.L.C. 24850 Farley Bucyrus, Kansas 66013

Jim Osborn Central States Energy, L.L.C. 24850 Farley Bucyrus, Kansas 66013

Atterney for Central States Energy, L.L.C.

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Exhibit A

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From: FOLAND WICKENS

THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners: Mark Sievers, Chairman Ward Loyd Thomas E. Wright		
In the matter of an Order to Show the Commission's own Motion iss Osborn Energy, L.L.C. and Centr Energy LLC., with regard to resp under K.S.A. 55-179 for plugging Lease in Section 12, Township 15 Range 24 East, Johnson County, 1	ued to) ral States) consibility) the Adams) South,)	Docket No. 12-CONS-152-CSHO CONSERVATION DIVISION License No. 32294 (expired) 34570
	OR	<u>DER</u>
THIS MATTER, having co	me before the S	state Corporation Commission of Kansas on Central
States Energy, LLC's Motion for C	ontinuance of H	learing, and good cause appearing therefore,
IT IS HEREBY ORDEREI	that the hearing	ng currently scheduled for March 15, 2012 at 10:00
a.m. is continued to May, 20	12, at	[a.m.] [p.m.].
DATED:	COM	MISSIONER