

**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

Before Commissioners: Pat Apple, Chair  
Jay Scott Emler  
Shari Feist Albrecht

In the matter of an Order to Show Cause issued ) Docket No. 17-CONS-3127-CSHO  
to Jaed Production Co., Inc. (“Operator”) )  
regarding responsibility under K.S.A. 55-179 for ) CONSERVATION DIVISION  
unplugged wells on an expired license. )  
\_\_\_\_\_ ) License No.: 3954

**RESPONSE TO PETITION FOR  
CLARIFICATION AND/OR RECONSIDERATION**

Jaed Production Co., Inc. (“Jaed”) a defunct corporation, files the following response to the Commission Staff’s Petition for Clarification and/or Reconsideration of the Commission’s October 31, 2017, Order.

1. Staff seemingly fails to recognize the simple fact that the Commission is seeking to impose responsibilities for unplugged wells on a defunct corporation. The Staff’s Petition for Clarification and/or Reconsideration is confusing, and ultimately pointless, since Jaed is not in existence, assuming it has the responsibility for plugging these unplugged wells.

2. The Staff cites a number of other dockets, which on their face are different from this docket, regarding the responsibility for abandoned wells. Since the doctrine of *res judicata* does not apply to any Commission determination, that is pointless. The Commission Staff also places profound importance on form T-1s that have been submitted for the leases that Jaed once operated. It is clear from the evidence that other parties have since operated these leases and thus are responsible for at least some of the wells in question.

3. There is no basis, based on the evidence produced at the hearing, for any clarification or reconsideration of the October 31, 2017, Order. The Commission Staff's Petition should be dismissed.

Respectfully submitted,  
MARTIN, PRINGLE, OLIVER,  
WALLACE & BAUER, L.L.P.

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#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 21, 2017, a true and correct copy of the above and foregoing *Entry of Appearance* was electronically filed with the Kansas Corporation Commission and mailed via U.S. Postal Service to:

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