

2015-05-15 08:27:14

Kansas Corporation Commission

/s/ Amy L. Gilbert

KCC WICHITA**MAY 15 2015****RECEIVED****BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

IN THE MATTER OF THE APPLICATION)
OF LINN OPERATING, INC. FOR AN) DOCKET NO. 15-CONS-776-CUNI
ORDER PROVIDING FOR THE)
UNITIZATION AND UNIT OPERATION OF)
A PART OF THE HUGOTON AND)
PANOMA COUNCIL GROVE GAS FIELDS)
IN THE ALTERNATE TRACT UNIT)
DESCRIBED AS SECTION 14-29S-39W) OPERATOR NO. 33999
(SE/4), SECTION 13-29S-39W (SW/4)) CONSERVATION DIVISION
SECTION 24-29S-39W (NW/4), SECTION)
23-29S-39W (NE/4) IN STANTON)
COUNTY, KANSAS (ATU 224))

REQUEST FOR CONTINUANCE OF PRE-HEARING(Scheduled for Monday, May 18th, 2015)

(Request for Leave to Amend Protest Pleading)

COMES NOW, Don K. Williams, (hereafter referred to as "Mineral/Surface Owner"), by his attorney, K. Mike Kimball, and requests:

1. Leave to Amend.

Leave to file an amended protest pleading stating the "Mineral/Surface Owner's" claims and positions in a more definite and certain manner. Said amended pleading to be filed on or before, May 22nd, 2015.

2. Request for Continuance of May 18th, 2015, Hearing.

A continuance of the pre-hearing presently set for May 18th, 2015 to any time, after May 22nd, 2015 and before, or on, June 6th, 2015, or in the alternative, at any time after June 26th, 2015. It would be appreciated if the setting of any hearing be after 11:30 p.m.

3. Request for Phone Hearing.

That in the event a hearing is required for consideration of the request for continuance, that the hearing for the continuance be by phone. K. Mike Kimball's phone number is (620) 353-8288.

In support of the above requests, the Commission and the parties hereto are shown:

1. That the proposed amended protest pleading will make

more definite and certain, Don Williams' position, claims and requests.

2. That the proposed amended protest pleading will assist in identifying the matters to be considered at the proposed hearing and the scheduling concerning thereof.
3. The apology of counsel for the protesting party, in not presenting a more artfully drawn pleading.

Don K. Williams by
KIMBALL LAW FIRM, LLP.

By 

K. Mike Kimball, SC#07080
P.O. Box 527
204 E. Grant
Ulysses, Kansas 67880
Phone (620) 424-4694
FAX (620) 356-3098
E-Mail: hkac@pld.com
Attorney for Don K. Williams

CERTIFICATE OF SERVICE

I, K. Mike Kimball, do hereby certify that on this 14th day of May, 2015, a true and correct copy of the above **Request for Continuance of Hearing**, was sent via FAX, email and by regular mail, properly addressed to:

Linn Operating, Inc., by serving its attorney:

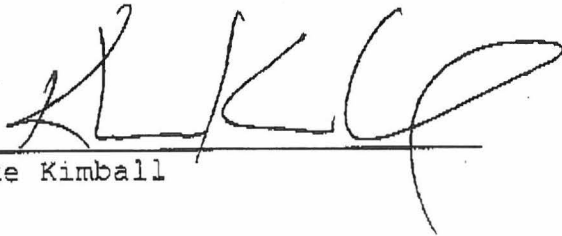
Stanford J. Smith, Jr.
MARTIN, PRINGLE, OLIVER, WALLACE,
& BAUER, L.L.P.
100 North Broadway, Suite 500
Wichita, Kansas 67202
FAX Number: (316) 265-2955
Email: sjsmith@martinpringle.com

Lane R. Palmateer
State Corporation Commission
of the State of Kansas
Conservation Division
266 N. Main, Suite 220
Wichita, Kansas 67202
FAX Number (316) 337-6106
Email: l.palmateer@kcc.ks.gov

John McCannon
State Corporation Commission
of the State of Kansas
Conservation Division
266 N. Main, Suite 220
Wichita, Kansas 67202
FAX Number (316) 337-6106

Original to:

State Corporation Commission
of the State of Kansas
Conservation Division
266 N. Main, Suite 220
Wichita, Kansas 67202
FAX Number: (316) 337-6211


K. Mike Kimball