

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chairman
Jay Scott Emler
Dwight D. Keen

In the matter of the application of Veem)
Jade Oil & Gas LLC, for an exception to the) Docket No. 18-CONS-3260-CEXC.
10-year limitation of K.A.R. 82-3-111 for its) CONSERVATION DIVISION
wells known to the Commission as: the) License No. 32874
Daves #D21 well, located in Section 27;)
Smith A #2 well, located in Section 28; and)
for determination of responsibility for the)
Smith B #10 and Smith B #12 wells, both)
located in Section 21, all in Township 29)
South, Range 9 East, Elk County, Kansas.

RESPONSE TO STAFF MOTION TO DISMISS

COMES NOW Veem Jade Oil & Gas LLC ("Operator"), and for its response to Staff's motion to dismiss filed June 21, 2018, in the captioned matter states as follows.

1. Operator filed this Application on January 2, 2018. The deadlines for protest, response or objection have expired. No protest, response, or objection has been received, and no action has been taken on this matter by the Commission.
1. Operator has provided updates to the Commission on the wells in this docket; most recently that all but one of the wells has been plugged, and a plugging application (Form CP-1) filed for the last open well--the Smith A #2. That well is set to be plugged at the plugging contractor's first available date.
2. Operator has reported that the request made in its above-captioned Application is now moot. Operator has been in regular contact with said plugging contractor regarding when

the contractor will be able to plug the Smith A #2 well, and expects that well to be plugged in a matter of days.

3. Staff's Motion alleges that Operator's Application contained deficiencies. Operator denies any deficiencies in its Application, and affirmatively states that its filing and pursuit of the relief sought in the Application was in accordance with Commission requirements. However, the matter of the Application being moot due to Operator's actions of testing and plugging the wells, Operator agrees that dismissal is proper at this time.

WHEREFORE, Operator does not object to dismissal of the above Application at this time, and further requests such other relief as the Commission deems necessary and appropriate.

Respectfully Submitted,

EDMISTON LAW OFFICE, LLC

By: /s/ Diana Edmiston

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Attorney for Veem Jade Oil & Gas LLC

VERIFICATION

California
STATE OF OKLAHOMA)
) SS:
COUNTY OF Los Angeles)

Mahesh Chhabra, of lawful age, being first duly sworn, upon oath states that he is the Managing Member of Veem Jade Oil & Gas LLC; and that he has read the foregoing, is familiar with the contents thereof, and that the statements contained therein are true and correct according to his knowledge, information and belief.

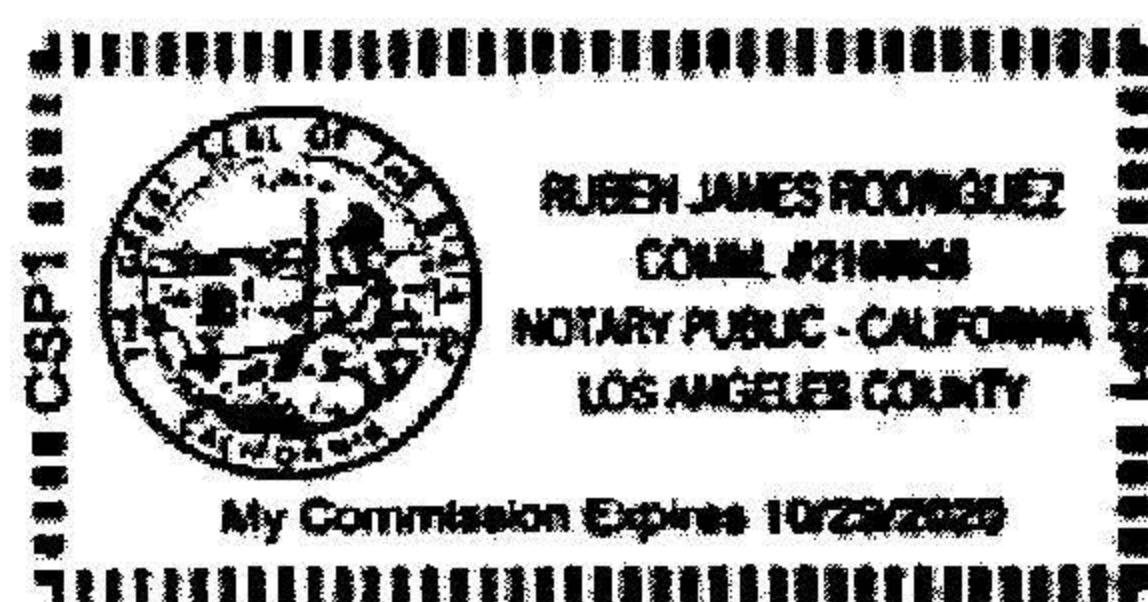
Subscribed and sworn to before me, a notary public.

Mahesh Chhabra

My appointment expires:

10-29-2020

Ruben James Rodriguez
Name Ruben James Rodriguez
Notary Public



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 2ND day of **July, 2018**, she caused the above and foregoing **Response** to be electronically delivered, to the following person at the addresses shown:

Lauren Wright, Litigation Counsel
Kansas Corporation Commission
Conservation Division
l.wright@kcc.ks.gov
Attorney for Commission Staff

/s/ Diana Edmiston