

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Failure of Haas Petroleum,)
LLC (Operator) to Comply with K.A.R.)
82-3-407 at its Bahr #6 A, Burke A #WI-16,) Docket No. 21-CONS-3193-CPEN
Luthi Dale #2 and Phillips #K 13 Wells.)

MOTION TO RESCHEDULE PREHEARING CONFERENCE

Haas Petroleum, LLC moves the Commission for an Order Rescheduling the Prehearing Conference in this Docket. In support of its Motion, Haas Petroleum, LLC states as follows:

1. Upon receiving the penalty issued in Docket 21-CONS-3201-CPEN, Operator retained counsel to represent them before the Commission.
2. A large package of documents was delivered to counsel by Operator and counsel began sorting through such package in an attempt to understand the controversies at issue.
3. Counsel was unaware that two separate dockets were pending. Counsel identified the penalty order issued in Docket 21-CONS-3201-CPEN and calendered a deadline of May 27, 2021 as the date by which action was necessary on the clients case file.
4. This large packet of documents received by counsel did contain the Order Designating Presiding Officer and Setting Prehearing Conference issued in Docket 21-CONS-3193-CPEN. However, such document was at the end of such package of documents, and believing that the applicable action deadline was May 27, 2021, counsel had not yet discovered the Order Designating Presiding Officer and Setting Prehearing Conference issued in Docket 21-CONS-3193-CPEN on May 13, 2021 when such prehearing conference was held.
5. Thus, Operator's failure to appear at said prehearing conference through counsel was the result of a misunderstanding of the procedural nature of the matters pending before the

Commission concerning Operator, while counsel was in the process of reviewing documents provided by Operator in order to obtain a complete understanding of the issue involved in representing Operator. This mistake was certainly inadvertent and no party will be prejudiced by the granting of this motion.

6. Counsel for Operator has now entered his appearance in both dockets, i.e. Docket 21-CONS-3201-CPEN and Docket 21-CONS-3193-CPEN, and requests that the prehearing conference in Docket 21-CONS-3193-CPEN be rescheduled to coincide with the date on which the prehearing conference in Docket 21-CONS-3201-CPEN is set. Placing both of these dockets on the same procedural track will result in efficiencies for both Staff and Operator.

7. Counsel for Operator has conferred with Staff concerning this relief requested in this motion and Staff is in agreement with this request. Staff has further agreed to withdraw its request for the issuance of a default order in this docket.



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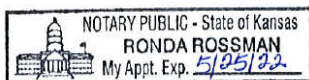
STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

Keith A. Brock, of lawful age, being first duly sworn on oath, states: That he is the attorney for Haas Petroleum, LLC, and is duly authorized to make this affidavit; that he has read the foregoing Motion to Reschedule Prehearing Conference, knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.



Keith A. Brock

SUBSCRIBED AND SWORN to before me this 21st day of May, 2021.



Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via U. S. Mail, postage prepaid, or electronically, this 21st day of May, 2021, addressed to:

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