

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

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

In the matter of an Order to Show Cause)	Docket No.: 16-CONS-591-CSHO
issued to Multiplex Resources, Inc. regarding)	
responsibility under K.S.A. 55-179 for)	CONSERVATION DIVISION
plugging five wells on the Neely Lease in)	
Neosho County, Kansas.)	License No.: 34353

MOTION FOR DEFAULT JUDGEMENT

Staff asks the Commission to issue a Default Judgement against Operator, whereby the Commission authorizes Staff to suspend Operator's license and seal all of Operator's oil and gas operations until such time as Operator plugs five wells on the Neely Lease.

1. On October 30, 2015, Staff motioned for an order to show cause to be issued against Operator, based upon Staff's belief that Operator was responsible for plugging five wells on the Neely Lease. On November 19, 2015, the Commission issued an order setting a December 3, 2015, prehearing conference, which Operator failed to attend. On December 9, 2015, Staff motioned to reschedule the prehearing conference, to ensure Operator was served at every plausible address at which Operator might be reached. On December 22, 2015, the Prehearing Officer scheduled a January 7, 2016, prehearing conference, which Operator failed to attend.

2. On January 21, 2016, the Commission issued a Default Order against Operator because Operator failed to attend the two prehearing conferences. Operator has not responded in any way to the Default Order, and the appeal deadline has passed.

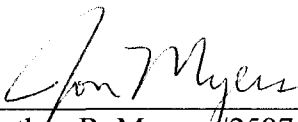
3. For the reasons described in Staff's motion to show cause, Operator is responsible for the following abandoned wells (collectively "the subject wells") in Section 30, Township 28 South, Range 19 East, Neosho County:

- a. North Neely #1, API #15-133-24150;
- b. North Neely #2, API #15-133-24151;
- c. North Neely #6, API #15-133-24189;
- d. NEE #02, GPS Coordinates 37.57780, -95.37880; and
- e. NEE #03, GPS Coordinates 37.57787, -95.37758.

4. Since Operator is responsible for the abandoned wells, Operator should be required to plug them. Since Operator has failed to do so in violation of Commission regulations and statutes, Operator's license should be suspended until such time as the wells are plugged. Since Operator has other holdings in Kansas, and it is illegal to operate under a suspended license, Staff should be allowed to shut-in and seal Operator's operations until such time Operator has plugged the subject wells.

5. Accordingly, Staff asks the Commission to issue a Default Judgment against Operator, whereby the Commission authorizes Staff to suspend Operator's license and seal all of Operator's oil and gas operations until such time as Operator plugs the subject wells.

Respectfully submitted,


Jonathan R. Myers, #25975
Litigation Counsel
Kansas Corporation Commission
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CERTIFICATE OF SERVICE

I certify that on 2/16/16, I caused a complete and accurate copy of this Motion to be served via United States mail, with the postage prepaid and properly addressed to the following:

B. L. Guiles
Multiplex Resources, Inc.
3262 Westheimer Road #519
Houston, Texas 77098

B. L. Guiles
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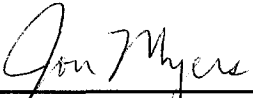
B. L. Guiles
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Justin Morris
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Yates Center, Kansas 66787
Registered Agent for Multiplex Resources, Inc.

John Almond, KCC District #3

And delivered by hand to:

Lane Palmateer
Conservation Division Central Office



Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission