

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

Before Commissioners: Shari Feist Albrecht, Chair
Jay Scot Emler
Dwight D. Keen

In the matter of the application of SEK Energy,) Docket No.: 18-CONS-3316-CEXC
LLC ("Operator") for an exception to the 10-)
year time limitation of K.A.R. 82-3-111 for its) CONSERVATION DIVISION
Marler, Richard #1-16 well located in the NE/4)
of Section 16, Township 30 South, Range 16) License No.: 33739
East, Wilson County, Kansas.)

**MOTION FOR CONSOLIDATION OF DOCKETS, THE DESIGNATION OF A
PREHEARING OFFICER, AND THE SCHEDULING OF A PREHEARING
CONFERENCE**

The Staff of the State Corporation Commission of the State of Kansas ("Staff" and
"Commission," respectively) files this Motion seeking consolidation of dockets, the designation
of a prehearing officer, and the scheduling a prehearing conference in this matter.

In support of its motion, Staff states as follows:

I. Background

1. On February 7, 2017, Operator filed an application in this docket for an exception
to the 10-year time limitation of K.A.R. 82-3-111 for the captioned well. Operator
simultaneously filed applications for six other wells. The dockets for all seven wells are 18-
CONS-3313-CEXC, 18-CONS-3314-CEXC, 18-CONS-3315-CEXC, 18-CONS-3316-CEXC,
18-CONS-3317-CEXC, 18-CONS-3318-CEXC, and 18-CONS-3319-CEXC.

2. K.A.R. 82-1-224 states two or more dockets may be consolidated by the
Commission for hearing on a common record if the Commission deems it to be in the public
interest to do so.

II. Argument


3. This docket, as well as the six other dockets referenced in paragraph one above, involve simultaneously-filed temporary abandonment applications with similar deficiencies. For each docket, Staff requested (1) proof of publication in the Wichita Eagle, and, in Docket 18-CONS-3319-CEXC, in the Parsons Sun, and (2) successful, Staff-witnessed casing integrity tests to be conducted. To date, Operator has not responded to Staff's request.

4. These and other potential issues with Operator's applications cause Staff to not recommend approval of Operator's applications at this time. Therefore, Staff believes it would be appropriate for this matter, as well as the six other dockets, to be consolidated for purposes of administrative efficiency and set for an evidentiary hearing.

5. Staff further notes that Operator is a corporate entity, and thus must be represented by counsel.¹ No counsel has entered an appearance on behalf of Operator.

WHEREFORE, for the reasons described above, Staff respectfully requests an Order consolidating the referenced dockets, designating a prehearing officer, and scheduling a prehearing conference, in anticipation of an evidentiary hearing where Staff may recommend denial of the applications.

Respectfully submitted,



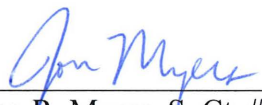
Jonathan R. Myers, #25975
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¹ See K.A.R. 82-1-228(d)(2); *see also* Order Denying Intervention to IBEW, Local Unions No. 304 and 225 (Feb. 6, 2018), KCC Docket 18-KCPE-095-MER.

VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

Jonathan R. Myers, of lawful age, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing *Motion*, and attests that the statements therein are true to the best of his knowledge, information and belief.



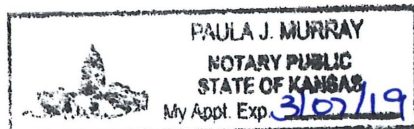
Jonathan R. Myers, S. Ct. #25975
Litigation Counsel
State Corporation Commission
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 30 day of APR, 2018.



Notary Public

My Appointment Expires: 3/07/19



CERTIFICATE OF SERVICE

18-CONS-3316-CEXC

I, the undersigned, certify that the true copy of the attached Motion has been served to the following parties by means of first class mail and electronic service on 4/30/18.

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/S/ Paula J. Murray

Paula J. Murray