

DEC 08 2014

CONSERVATION DIVISION
WICHITA, KS

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

Before Commissioners:

Shari Feist Albrecht, Chair
Jay Scott Emler
Pat Apple

In the matter of the failure of Eickbush)
Production Co. LLC dba ECCO) Docket No. 15-CONS-072-CPEN
("Operator") to comply with K.A.R. 82-3-)
400 at the Bdjt Unit #6, F Johnson Unit) CONSERVATION DIVISION
#7, Mini Johnson #1, Thomas #1 W and)
Thomas #1-E wells in McPherson County,)
Kansas) License No.: 5810

MOTION FOR CONTINUANCE

COMES NOW Eickbush Production Co., LLC, by and through its counsel of record, and requests that the evidentiary hearing and the other procedural deadlines in this matter be continued until a mutually agreeable date in 2015. In support of this Motion, Eickbush Production Co., LLC submits the following:

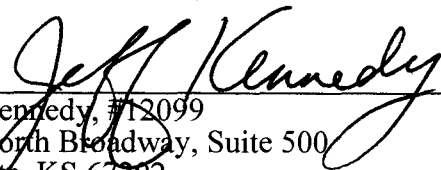
1. A Prehearing Conference was held in this docket on October 2, 2014, at which time the Prehearing Officer issued a Procedural Schedule.
2. Based upon conversations with counsel for the Commission Staff, it appears that the penalty that has been assessed by Order dated July 22, 2104, and mailed August 14, 2014, can be resolved by a settlement agreement between the Commission and Eickbush Production Co., LLC.
3. It would be a gross misuse of the parties' resources to prepare for and participate in this hearing, when this matter can be resolved by agreement.

WHEREFORE, Eickbush Production Co., LLC requests that the evidentiary hearing in this matter, and the other procedural deadlines established by the Prehearing Officer, be

continued until dates that the parties can agree on in 2015, and for such additional and further relief as the Commission may find appropriate.

Respectfully submitted,
MARTIN, PRINGLE, OLIVER,
WALLACE & BAUER, L.L.P.

By: _____

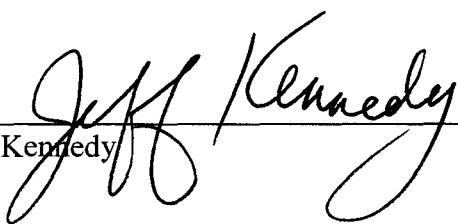

Jeff Kennedy, #12099
100 North Broadway, Suite 500
Wichita, KS 67202
Telephone: (316) 265-9311
Facsimile: (316) 265-2955
jkennedy@martinpringle.com
*Attorneys for Eickbush Production
Company, L.L.C.*

VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

Jeff Kennedy of lawful age and being first duly sworn, on oath, deposes and states:

That Jeff Kennedy, counsel for Eickbush Production Company, has read the above and foregoing Request for Hearing and that the statements and averments contained therein are true and correct to the best of his knowledge and belief.

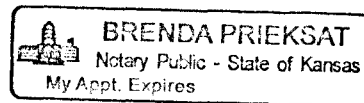

Jeff Kennedy

SUBSCRIBED and SWORN TO before me this 8 day of December, 2014.


Notary Public

My appointment expires:

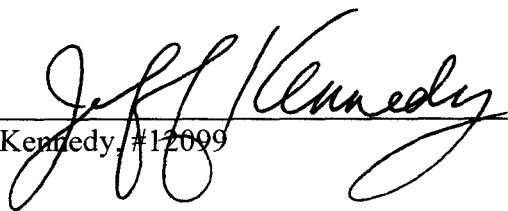
3-16-15



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 8th day of December, 2014, a true and correct copy of the above and foregoing Request for Hearing was hand delivered to:

Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission
266 N. Main St., Ste. 220
Wichita, KS 67202-1513



Jeff Kennedy, #12099