

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

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

In the matter of an Order to Show Cause issued ) Docket No.: 17-CONS-3099-CSHO  
to IGWT, Inc. (“Operator”) regarding )  
responsibility under K.S.A. 55-179 for Wernli ) CONSERVATION DIVISION  
#5, #7, #8 and #9 wells on the Wernli lease in )  
Greenwood County, Kansas. ) License No.: 3167

**RESPONSE TO MOTION FOR CONTINUANCE**

Comes now Commission Staff and in response to IGWT’s Motion for Continuance states the following:

1. Staff agrees that the docket is to determine IGWT’s responsibility to plug certain abandoned wells and that the wells are not currently an active pollution source.
2. Based on the above Staff has no objection to granting the requested continuance.
3. Staff does not agree, however, with IGWT’s statement that the outcome of potential rulemaking under Docket No. 17-CONS-3362-CINV may significantly impact the outcome of this docket. This docket is based on facts, such as the wells in question being transferred to IGWT and IGWT verifying well inventories including the wells in question, which are outside the proposed rulemaking.

4. Staff doesn't believe there is any harm in granting the continuance and adopting the prefiling schedule proposed by IGWT.

Respectfully submitted,

by   
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**CERTIFICATE OF SERVICE**

I certify that on January 18, 2017, I caused a complete and accurate copy of this Response to Motion for Continuance to be served via United States mail, with the postage prepaid and properly addressed to the following:

John Pike  
Withers, Gough et al.  
200 W. Douglas, Suite 1010  
Wichita, Kansas 67202  
*Attorney for IGWT, Inc.*

And delivered electronically to:

Michael Duenes  
Assistant General Counsel

/s/ Cynthia K. Maine  
Cynthia K. Maine  
Administrative Assistant  
Kansas Corporation Commission