## THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

DC	0	•	•	
Before	Comm	1SS	noners:	

Shari Feist Albrecht, Chair Jay Scott Emler Pat Apple

)

)

)

)

)

In the matter of an Order to Show Cause issued to Red Cloud Exploration Operating LLC, Global Energy Solutions Inc., and N.R. Hamm Contractor LLC regarding responsibility under K.S.A. 55-179 for plugging 4 wells on the Heck Lease in Jefferson County, Kansas. Docket No.: 15-CONS-272-CSHO

CONSERVATION DIVISION

License No.: 34224 32316 6192

## **MOTION FOR CONTINUANCE**

Staff requests that the hearing in this docket, currently scheduled for January 15, 2015, be continued to February 19, 2015, with the deadlines for pre-filed testimony and discovery adjusted accordingly. Staff's pre-filed testimony is currently due December 15, 2014, but Staff believes that a continuance will probably avoid the need for a hearing entirely.

Staff Litigation Counsel has conferred with the other parties, who were not opposed to a

continuance, although the specific date was not discussed with all parties.

Respectfully submitted,

Jonathan R. Myers, #25975 Litigation Counsel Kansas Corporation Commission 266 N. Main, Suite 220 Wichita, Kansas 67202 Phone: 316-337-6200 Fax: 316-337-6106

## **CERTIFICATE OF SERVICE**

14 0 2 I certify that on , 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:

Patrick R. Watkins Daniel L. Watkins 901 New Hampshire Street, Suite 200 Lawrence, Kansas 66044 *Attorneys for N.R. Hamm Contractor, LLC* 

James G. Flaherty Anderson & Byrd, LLP 216 S. Hickory, P.O. Box 17 Ottawa, Kansas 66067 *Attorney for Global Energy Solutions, Inc.* 

Tom Rhoads Glaves Irby & Rhoads 155 N. Market Wichita, Kansas 67202 *Attorney for Red Cloud Exploration Operating LLC* 

And delivered by hand to:

Jonelle Rains/Kraig Stoll Conservation Division Central Office

Jonathan R. Myers Litigation Counsel Kansas Corporation Commission