

**ADAMS JONES LAW FIRM, P.A.**

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**BEFORE THE STATE CORPORATION COMMISSION OF KANSAS**

In the matter of the Application of	)	Docket No. 25-CONS-3340-CUIC
Craig Gabel, Requesting Approval to	)	CONSERVATION DIVISION
Inject Saltwater through Cowskin Creek, Unit B#1	)	License No. 30729
in the SW/4 NE/4 SE/4 of Section 10	)	
Township 30S, Range 1E, in Sumner County, KS	)	

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**MOTION FOR DEFAULT JUDGMENT**

COMES NOW, Twyla Hoobler Wagner, Trustee of the Twyla Hoobler Wagner Trust (the “Trust”), an interested person, by and through counsel, Joshua S. Albin of Adams Jones Law Firm, P.A., and moves the Commission for an Order Dismissing the Application with Prejudice. In support of its motion, the Trust submits the following:

1. An Order Designating Presiding Officer and Setting Prehearing Conference was sent to the Applicant on April 29, 2025.
2. Parties for the Trust and Kansas Corporation Commission appeared before the Presiding Officer as directed on May 15, 2025 at 3:15 p.m.
3. The Applicant, Craig Gabel, failed to appear.
4. Under the Kansas Administrative Procedure Act, any party that fails to participate in prehearing conferences may be held in default.
5. The Applicant failed to appear or give any response.

WHEREFORE, the Trust, prays the Commission dismisses the application with prejudice due to the lack of participation as allowed by the Kansas Administrative Procedure Act, K.S.A., § 77-501 *et seq*, and for any other relief the Commission determines is just and proper.

Respectfully submitted

/s/Joshua S. Albin  
Joshua S. Albin, SC#26296  
*Attorney for Twyla Hoolber Wagner Trust*

#### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion for Default was filed with the Kansas Corporation Commission using their electronic filing system, with courtesy copies of the same being sent to:

Kelcey Marsh, Litigation Counsel  
Kansas Corporation Commission  
266 N Main Street, Ste 220  
Wichita, Kansas 67202  
[Kelcey.marsh@ks.gov](mailto:Kelcey.marsh@ks.gov)

/s/Joshua S. Albin  
Joshua S. Albin, SC#26296  
*Attorney for Twyla Hoolber Wagner Trust*