

SEP 18 2017

CONSERVATION DIVISION
WICHITA, KS

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

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

In the Matter of the Failure of MEM Partnership) Docket No. 17-CONS-3398-CPEN
LP, a General Partnership (Operator) to comply)
with K.A.R. 82-3-111 at the Cooley #1 in Graham) CONSERVATION DIVISION
County, Kansas.) License No. 3809

**MOTION TO DENY COMMISSION'S ALLEGATION THAT OPERATOR
IS AN ARTIFICIAL PERSON, RESULTING IN A DEFAULT**

The Commission has stated in an Order dated August 17, 2017 that Operator is an
"artificial person," whereby Commission has Ordered, that Operator as an artificial person, hire a
Kansas licensed attorney to represent the Operator in a Hearing with the Commissioners. Operator
has denied that Operator is an "artificial person," in this Order and previous Motions.

Operator has substantial evidentiary requirements that Operator is not an artificial person.
Commission Ordered a Default, because of the artificial person accusations, and Operator does
hereby requests that the allegations raised in said Order be discarded as unfounded charges.

Operator has complied, with "Any Party Affected" reconsideration, pursuant to K.S.A.
77-529(a) on all of the Commission Orders in a timely matter and therefore Operator denies that
Operator is in Default.

WHEREFORE, Operator respectfully requests that all of the Commission Orders dated
August 17, 2017 be denied and declared null and void.

Dated: September 13, 2017, with original and 7 copies sent to KCC in Wichita, KS.

Respectfully submitted,



William Story, Pro Se, Owner of
MEM Partnership, LP
PO Box 130832,
Spring, Texas 77393
Phone: 936-828-6018