

MAR 27 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 (MEM) to Comply)
with K.A.R. 82-3-111 at the Cooley #1 in Graham) CONSERVATION DIVISION
County, Kansas.)
) LICENSE No. 3809

**ADDENDUM: A PETITION TO DETERMINE
LEGAL REPRESENTATION FOR MEM PARTNERSHIP, LP**

1. On February 21, 2017 at 1:30 p.m. a telephone Prehearing Conference call was held between the Deputy General Counsel, Kansas Corporation Commission (Commission) and MEM Partnership, LP, (MEM) pursuant to the Order Designating Prehearing Officer and Setting Prehearing Conference, dated January 24, 2017.

2. At this telephone Prehearing Conference the Deputy General Counsel Dustin L. Kirk was presiding and KCC Conservation Division staff (KCC) attorney Jon Meyers, from KCC Wichita, Kansas's office was also a participant and with William Story the Managing Partner of MEM Partnership, LP representing MEM.

3. At this Prehearing Conference call a discussion ensued whereby two major topics were discussed, the first of which was the statement by KCC staff attorney indicating that if this Docket No. 17-CONS-3398-CPEN were to go to a formal hearing with the Commissioners, then at that point MEM must be represented by a Kansas licensed attorney.

4. Whereby on every document regarding official dockets issued by the KCC, to the best of our knowledge, has the very viable statement indicating as follows: "A Corporation shall appear before the Commission by a Kansas licensed attorney." The

subject Order Designating Prehearing Officer and Setting Prehearing Conference dated January 24, 2017, has this above statement in paragraph “E” of that document.

5. MEM is not a corporation, does not hold themselves out to be a corporation and there are numerous major differences between a corporation and a partnership with some of these differences are shown as follows:

a) A corporation has more people in the decision making process with a board of directors and management deciding on how the company is operated and a corporation is an independent legal entity owned by shareholders. A Partnership has two or more individuals that share ownership and the owners are responsible for expenses, liability and profit.

b) Corporations are more complicated with administrative fees, and complex tax and legal requirements and corporations must file Articles of Incorporation and obtain state and local licenses and permits, where Partnerships do not.

c) Corporation must have a Federal ID number and file IRS tax returns as a separate entity. In Partnerships, the partners are held liable for all company taxes, debts and legal responsibilities.

6. MEM respectfully does not agree with KCC staff as to whether legal representation by a Kansas licensed attorney is required before a formal hearing with the Commissioners

7. KCC staff indicated that the Commissioners should make the decision for legal representation for MEM, If in fact this matter is not resolved between the KCC staff and MEM prior to the formal hearing.

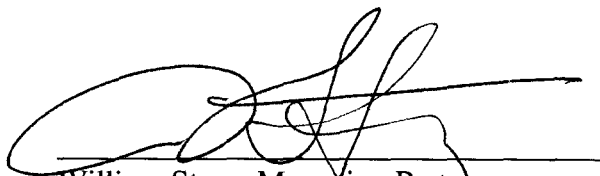
8. It appears respectfully to MEM that it should be the responsibility of MEM management to determine whether or not a Kansas licensed attorney is needed at a formal hearing before the commissioners. In any regard, it is the responsibility of MEM to receive the Official Order of the Commissioners with or without a Kansas licensed attorney.

9. Please be advised that the undersigned William Story has represented MEM Partnership, LP, before formal hearings of the Commissioners on three (3) different occasions over the past twenty (25) five years and if a Kansas licensed attorney is required at this time, then it may appear that the previous Commission Orders could be invalid. It is the opinion of MEM management that William Story is fully capable of representing MEM's interest in this matter. MEM has always found the Commissioners to be completely fair and equitable in their Official Orders.

10. The other major topic at the above telephone Prehearing Conference call was that this telephone Prehearing Conference should be continued until March 21, 2017 at 1:30 p.m. and all participants approved this continuance.

WHEREAS, CONSIDERING THE ABOVE, MEM Partnership, LP respectfully prays that this matter be resolved administratively within the KCC staff, if possible, or if not resolved to the satisfaction of both parties, pray herewith that this mater is set for a State Corporation Commission formal hearing and upon this formal hearing that the Commissioners shall grant MEM their request that a Kansas licensed attorney does not need to represent MEM in this Docket No. 17-CONS-3398-CPEN proceedings.

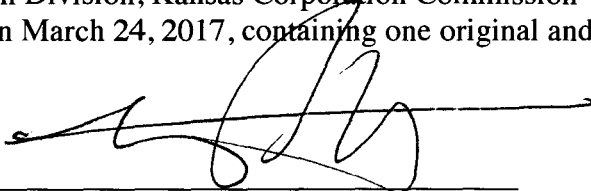
Dated: March 24, 2017.



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DISCLAIMER: Please be advised that William Story is not an attorney, does not claim to be an attorney, does not hold himself out to be an attorney, does not participate in court cases regarding the unauthorized practice of law, and will not act as an attorney in the presentation of this subject Docket No. 17-CONS-3398-CPEN, and will only discuss the facts to the Corporation Commissioners at this formal hearing. William Story is the managing partner for MEM Partnership, LP, which is a very limited small oil producing partnership and hiring an attorney would be a major financial burden on this entity.

This undersigned does hereby certify that this document above was mailed to the Corporation Commission staff at the KCC Conservation Division, Kansas Corporation Commission at 266 N. Main Street, Suite 220, Wichita, KS 67202 on March 24, 2017, containing one original and seven (7) copies.



William Story, Managing Partner
MEM Partnership, LP

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