

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

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

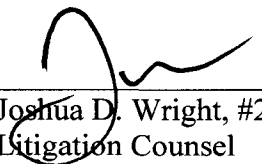
In the matter of the failure of MEM Partnership) Docket No.: 17-CONS-3398-CPEN
LP, a General Partnership ("Operator") to)
comply with K.A.R. 82-3-111 at the Cooley #1) CONSERVATION DIVISION
in Graham County, Kansas.)
_____) License No.: 3809

**STAFF'S RESPONSE TO WILLIAM STORY'S "OPERATOR'S RESPONSE TO
STAFF'S RESPONSE DATED JULY 25, 2017 ENTITLED "PROPOSED DEFAULT
ORDER".**

William Story's request for the Commission to vacate its July 25, 2017 Proposed Default Order should be denied as no new information is contained in Mr. Story's motion. Mr. Story continues to engage in the unauthorized practice of law by filing pleadings on behalf of MEM Partnership in defiance of the Commission's Orders. Staff again requests the arguments raised in his pleading be discarded as the unauthorized practice of law.

WHEREFORE, Commission Staff respectfully requests the Commission deny the relief sought by William Story and discard all legal arguments raised in his motion.

Respectfully submitted,



Joshua D. Wright, #24118
Litigation Counsel
Kansas Corporation Commission
266 N. Main, Suite 220
Wichita, Kansas 67202-1513
Phone: 316-337-6200; Fax: 316-337-6211

CERTIFICATE OF SERVICE

I certify that on 8/9/17, I caused a complete and accurate copy of this Response to be served via United States mail, with the postage prepaid and properly addressed to the following:

William Story
MEM Partnership LP, A General Partnership
PO Box 130832
Spring, TX 77393-0832

And delivered by email to:

Joshua D. Wright, Litigation Counsel
KCC Wichita Office

Dustin Kirk, Deputy General Counsel
KCC Topeka Office

/s/ Paula J. Murray
Paula J. Murray
Legal Assistant
Kansas Corporation Commission