

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

In the Matter of a Compliance Agreement)	Docket No.: 20-CONS-3102-CMSC
between Carolyn Koehn ("Operator") and)	
Commission Staff regarding bringing 9 wells)	CONSERVATION DIVISION
in McPherson County, Kansas into compliance)	
with K.A.R. 82-3-111.)	License No.: 3822

RESPONSE TO MOTION REQUESTING EXTENSION

Comes now the Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) in response to the Motion Requesting Extension filed by Carolyn Koehn ("Operator"). In support of Staff's response, Staff states the following:

1. On October 8, 2019, the Commission issued an Order Approving Compliance Agreement ("Agreement") in this docket.¹ The Agreement required Operator to bring 9 wells total into compliance with K.A.R. 82-3-111.² The Operator was required to bring one well into compliance with K.A.R. 82-3-111 by November 1, 2019, and one additional well into compliance with K.A.R. 82-3-111 within each three calendar months thereafter.³

2. On November 4, 2019, Operator plugged the Lovett B #1 well.

3. On February 5, 2020, Operator returned the Nightingale #1 to service.

4. On April 23, 2020, the Commission issued a *Special Order Regarding Conservation Matters* in Docket 20-GIMX-393-MIS, granting Operator until June 7, 2020 to become current in their obligations under the Agreement.⁴

¹ Order Approving Compliance Agreement (Oct. 8, 2019).

² Compliance Agreement at ¶2 (Oct. 8, 2019).

³ *Id.*

⁴ 20-GIMX-393-MIS, *Special Order Regarding Conservation Matters*, ¶11 (April 23, 2020).

5. On July 29, 2020, Operator filed a *Motion Requesting Extension* wherein Operator stated that she was requesting a six-month extension due to the lack of finances to plug wells at this time.⁵

6. To date, Operator is required to have brought 4 of the wells subject to the Agreement into compliance with K.A.R. 82-3-111.

7. Staff has had the opportunity to review the Operator's Motion Requesting Extension in this matter. Staff does not believe the grant of Operator's Motion is appropriate at this time. Operator is behind in their Agreement, and Staff does not believe that Operator has presented any information in their motion that would require such an extension to be granted.

In Conclusion, for the reasons described above, Staff recommends the Commission deny Operator's Motion Requesting Extension.

Respectfully submitted,

/s/ Kelcey Marsh
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⁵ *Motion Requesting Extension* (July 29, 2020).

CERTIFICATE OF SERVICE

20-CONS-3102-CMSC

I, the undersigned, certify that a true copy of the attached Response to Motion Requesting an Extension has been served to the following by means of first class mail and electronic service on August 10, 2020.

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/S/ Paula J. Murray

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