

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

In the matter of whether the license of Thor) Docket No. 24-CONS-3001-CSHO
Operating, LLC (Operator) should be revoked)
) CONSERVATION DIVISION
)
)
_____)

MOTION TO VACATE PROPOSED ORDER

COMES NOW Thor Operating, LLC (“Operator”), and moves the Commission to vacate the Proposed Default Order. In support of the Motion, the Operator shows to the Commission as follows:

1. Scott Goetz is the sole member of Thor Operating, LLC. In the Motion for Designation of a Presiding Officer and the Scheduling of a Prehearing Conference, staff asserts that Scott Goetz was an employee of Quito, Inc. Mr. Goetz has never been an employee of Quito, Inc.
2. Scott Goetz is not within any of the prohibited classifications of persons specified in K.S.A. 55-155 (c)(4) or K.A.R. 82-3-120 (g)(2),

WHEREFORE, Operator moves the Commission to vacate the Proposed Order.

JOHN R. HORST, P.A.

By: /s/ John R. Horst _____

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File No. 3133.1

S. Ct. #09412

CERTIFICATE OF SERVICE

I, the undersigned, certify that a true copy of the above Motion to Vacate Proposed Order had been served to the following by means of electronic service on August 10, 2023, and as now corrected is being reserved to the following by means of electronic service on August 11, 2023.

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