

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

In the matter of whether the license of )  
Thor Operating, LLC (Operator) should be )  
revoked. )

Docket No: 24-CONS-3001-CSHO

) CONSERVATION DIVISION

) License No: 36020

**SUPPLEMENT TO MOTION TO VACATE PROPOSED ORDER**

COMES NOW Thor Operating, LLC (“Operator”), and supplements its prior Motion to Vacate Proposed Default Order. Attached hereto and incorporated herein by reference is the Affidavit of Scott Joe Goetz, a/k/a Scott Goetz, stating that although the prior Motion for the Designation of a Presiding Officer and the Scheduling of a Prehearing Conference (the “Motion”), and the Order Designating Presiding Officer and Setting Prehearing Conference (the “Order”) were apparently deposited in the United States Mail, first class, to the correct mailing address for Thor Operating, LLC, the Operator did not, in fact, receive copies of either the Motion or Order in the United States Mail.

WHEREFORE, for the reasons previously set forth in Thor’s initial Motion to Vacate Proposed Order, and for the further reasons set forth in this Supplement to Motion, Operator moves the Commission to vacate the Proposed Default Order.

JOHN R. HORST, P.A.

By /s/ John R. Horst  
JOHN R. HORST  
207 W. Fourth Ave.  
P.O. Box 560  
Caney, KS 67333  
Attorney for Operator  
File #3133.1  
S.Ct. #09412

CERTIFICATE OF SERVICE

I, the undersigned, certify that a true copy of the above Supplement to Motion to Vacate Proposed Order has been served to the following by means of electronic service on August 14, 2023.

Kelcey Marsh, Litigation Counsel  
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/s/ John R. Horst  
JOHN R. HORST

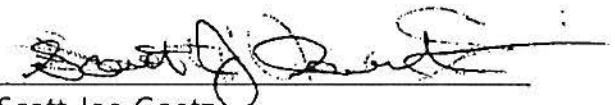
AFFIDAVIT

STATE OF KANSAS )  
 )SS:  
COUNTY OF CHAUTAUQUA )

Scott Joe Goetz, a/k/a Scott Gotez, of lawful age, being first duly sworn on oath states:


I am the managing member of Thor Operating, LLC. The correct mailing address for Thor Operating, LLC is 6016 Cornell Drive, Bartlesville, Oklahoma 74006. Although the certificate of service attached to the Motion for the Designation of a Presiding Officer and the Scheduling of a Prehearing Conference (the "Motion") in Docket No. 24-CONS-3001-CSHO, In the Matter of Thor Operating, LLC (Operator) to Show Cause Why It Should Not Have Its License Revoked, together with the Order Designating Presiding Officer and Setting Prehearing Conference (the "Order") shows that both the Motion and Order were deposited in the United States Mail, first class, and properly addressed, Thor Operating, LLC did not receive either the Motion or the Order, and I was unaware of the prehearing conference scheduled on Thursday, July 27, 2023 at 4:30 p.m. in the captioned matter. Had I received the Motion and Order, I would have contacted counsel to appear on behalf of Thor Operating, LLC.

Further affiant sayeth naught.

  
\_\_\_\_\_  
Scott Joe Goetz

STATE OF KANSAS )  
 )SS:  
COUNTY OF CHAUTAUQUA )

Subscribed and sworn to before me this 23<sup>rd</sup> day of August, 2023.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Appointment Expires:

