

JUL 16 2020  
CONSERVATION DIVISION  
WICHITA, KS

TO THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the failure of Great Plains	)	Docket No.: 20-CONS-3279-CPEN
Petroleum, Inc. ("Operator") to comply with	)	
K.A.R. 82-3-111 at the Adams #1-16 in Meade	)	CONSERVATION DIVISION
County, Kansas.	)	
_____	)	License No.: 30163

**MOTION TO RESCHEDULE PREHEARING CONFERENCE**

COMES NOW the Protestant, Rod A. Phares, who respectfully moves that the Kansas Corporation Commission reschedule a *prehearing* conference for this docket in regard to bringing the Adams #1-16 well back into compliance with K.A.R. 82-3-111 and then returning the well to service, or alternatively plugging and abandoning the well.

1. A Prehearing Conference was scheduled for July 2, 2020. Protestant was absent from the conference, due to the fact that Protestant was not aware that a conference had been scheduled.

2. Protestant only became aware of the scheduled conference on July 7, 2020 after viewing an email from the Kansas Corporation Commission providing notice of a Motion For Default Order in the matter referenced above.

3. Protestant then performed a search of his email document inbox and discovered an email dated June 16<sup>th</sup>, 2020 from DeeAnn Shupe, with Document Service in the subject line. This email had not been opened.

4. Protestant hereby acknowledges that it appears that the Kansas Corporation Commission provided Protestant with proper notice regarding the scheduled conference.

5. Protestant hereby asserts he was unaware of the scheduled conference and did not intentionally fail to attend or participate. This failure was due to an overwhelming schedule of job and family obligations.

6. Protestant still desires to return the subject well to compliance and requests that a second Prehearing Conference be scheduled. This will aid in putting the subject well to its best use and avoiding waste.

7. Protestant has job obligations to work outside of the office beginning July 10, 2020 through July 18, 2020. Protestant will not have access to mail service during that period. Protestant may have access to email service during that period, but that is not certain. Protestant therefore requests that any additional information required by the Commission to consider this Motion be via telephone (via direct contact, voicemail, or text message) at the number 316 655-6106.

8. Likewise, if the Commission does consent to grant Protestants request to reschedule a Prehearing Conference, that notice be given in the usual manner, plus the additional grant of notice via telephone (at the number referenced above), if and only if, the conference is scheduled to occur prior to July 22, 2020.

WHEREFORE, for the reasons set forth above, Protestant respectfully requests that the Commission consider our request and reschedule a Prehearing Conference in regards to the matter outlined in Docket No.: 20-CONS-3279-CPEN.

Respectfully submitted,



Rod A. Phares  
President  
Great Plains Petroleum

221 Circle Drive  
Wichita, KS 67218  
Office Phone: 316-685-8800 Cell Phone: 316-655-6106  
gprod@cox.net

CERTIFICATE OF SERVICE


20-CONS-3279-CPEN

I, the undersigned, certify that a true copy of the attached Motion To Reschedule Prehearing Conference has been served to the following by means of first class mail and electronic service on July 10, 2020.

KELCEY MARSH, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
CENTRAL OFFICE  
266 N. MAIN ST. STE 220  
WICHITA, KS 67202-1513  
Fax: 785-271-3354  
k.marsh@kcc.ks.gov

ROD A. PHARES  
GREAT PLAINS PETROLEUM, INC.  
221 CIRCLE DR  
WICHITA, KS 67218-1207  
gprod@cox.net

JONATHAN R. MYERS  
ASSISTANT GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
266 N. MAIN ST. STE 220  
WICHITA, KS 67202-1513  
Fax: 316-337-6211  
j.myers@kcc.ks.gov

  
Rod A. Phares