

**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

PETITION FOR RECONSIDERATION

COMES NOW the Protestant, Rod A. Phares, who respectfully moves that the Kansas Corporation Commission reconsider our previous request to reschedule a *prehearing* conference for this docket in regards 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 16th, 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.

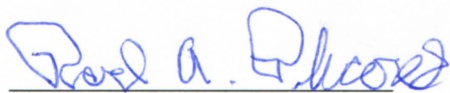
6. Protestant still desires to return the subject well to compliance and requests that a second Prehearing Conference be scheduled. This will aid in putting the subject well to its best use and avoiding waste. For example, one of the Commission's main areas of discretion is outlined in 82-3-100 (b) "*An exception to the requirements of any regulation in this article may be granted by the commission, after considering whether the exception will prevent waste, protect correlative rights, and prevent pollution.*" Granting an extension of time certainly meets this mandate of the Commission as considering this well for saltwater disposal will allow another operator the potential to convert a non-economic oil well into a productive asset for the company, royalty owners, and taxing authorities.

7. **Special Pleading:**

REDACTED

WHEREFORE, for the reasons set forth above, Protestant respectfully requests that the Commission consider our Petition For Reconsideration and ancillary request to 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

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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.

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