

DEC 02 2014

2014.12.02 16:16:45
Kansas Corporation Commission
/S/ Thomas A. Day

RECEIVED

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chair
Jay Scott Emler
Pat Apple

In the matter of the failure of Patrick)
Development Corporation ("Operator") to) Docket No. 15-CONS-197-CPEN
comply with K.A.R. 82-3-400 at the)
Hegwald #d-1 (WSW), Hendricks #PDC) CONSERVATION DIVISION
11, Hendricks #PDC 10 and Henrichs)
#PDC 9 wells in Woodson and Allen)
Counties, Kansas) License No.: 6279

MOTION FOR CONTINUANCE

COMES NOW Patrick Development Corporation, by and through its counsel of record, and requests that the evidentiary hearing and the other procedural deadlines in this matter be continued until a mutually agreeable date in 2015. In support of this Motion, Patrick Development Corporation submits the following:

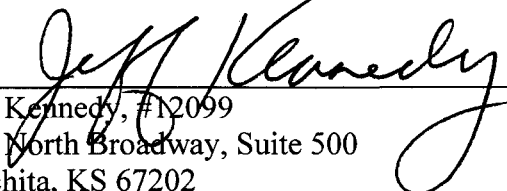
1. A Prehearing Conference was held in this docket on Thursday, October 23, 2014, at which time the Prehearing Officer issued a Procedural Schedule.
2. Based upon conversations with counsel for the Commission Staff, it appears that the penalty that has been assessed by Order dated August 26, 2014, and mailed September 9, 2014, can be resolved by a settlement agreement between the Commission and Patrick Development Corporation.
3. It would be a gross misuse of the parties' resources to prepare for and participate in this hearing, when this matter can be resolved by agreement.

WHEREFORE, Patrick Development Corporation requests that the evidentiary hearing in this matter, and the other procedural deadlines established by the Prehearing Officer, be

continued until dates that the parties can agree on in 2015, and for such additional and further relief as the Commission may find appropriate.

Respectfully submitted,
MARTIN, PRINGLE, OLIVER,
WALLACE & BAUER, L.L.P.

By: _____


Jeff Kennedy, #12099

100 North Broadway, Suite 500

Wichita, KS 67202

Telephone: (316) 265-9311

Facsimile: (316) 265-2955

jkennedy@martinpringle.com

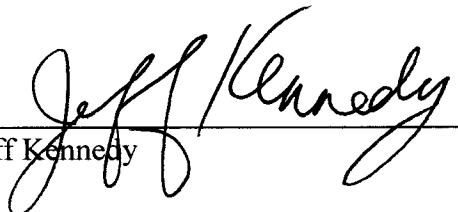
*Attorneys for Patrick Development
Corporation*

VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

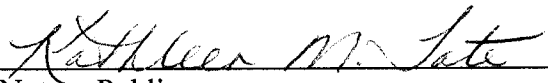
Jeff Kennedy of lawful age and being first duly sworn, on oath, deposes and states:

That Jeff Kennedy, counsel for Patrick Development Corporation, has read the above and foregoing Request for Hearing and that the statements and averments contained therein are true and correct to the best of his knowledge and belief.



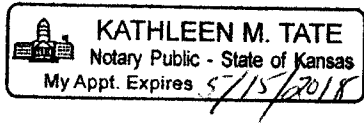
Jeff Kennedy

SUBSCRIBED and SWORN TO before me this 2nd day of December, 2014.



Notary Public

My appointment expires:

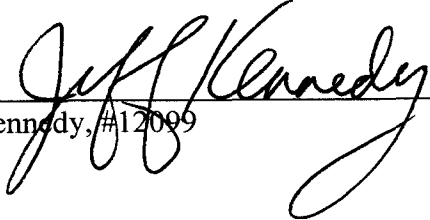


CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 2nd day of December, 2014, a true and correct copy of the above and foregoing Request for Hearing was hand delivered to:

Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission
266 N. Main St., Ste. 220
Wichita, KS 67202-1513
Phone: 316-337-6200
Fax: 316-337-6211

Lane R. Palmateer
Prehearing Officer
Kansas Corporation Commission
266 N. Main St., Ste. 220
Wichita, KS 67202-1513
Phone: 316-337-6200
Fax: 316-337-6211



Jeff Kennedy, #12099