

JUN 12 2017

CONSERVATION DIVISION
WICHITA, KS

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

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

In the matter of the Failure of MEM Partnership) Docket No. 17-CONS-3398-CPEN
LP, a General Partnership (Operator) (MEM) to)
Comply with K.A.R. 82-3-111 at the Cooley #1) CONSERVATION DIVISION
well in Graham County, Kansas.)
_____) License No. 3809

**ANSWER TO COMMISSION STAFF'S MOTION TO STRIKE THE PRE-FILED
DIRECT TESTIMONY OF WILLIAM STORY**

Come now, William Story D/B/A MEM Partnership, LP (MEM) and respectfully requests that the Commission accept William Story's pre-filed direct testimony and not be stricken from consideration in this Docket as requested by Commission Staff. Also, that the Commissions Staff's request for an extension to the procedural schedule regarding Staff's pre-filed rebuttal testimony to July 10, 2017, should be respectfully denied.

1. Please be advised that William Story is not an attorney. The undersigned will only answer questions and provide information as an individual in the same style and wording as the document received from the KCC Staff for better readability for the Commissioners.
2. MEM is not familiar with Attorney General Opinion 93-100 (July 26, 1991) definition of what may be considered the illegal practice of law. But how can an individual who is not an attorney be accused of acting as an attorney merely based on the language used or style of writing to accommodate the Commissioners in their hearing procedure?
3. On May 30, 2017, MEM pre-filed two sets of direct testimony. William Story did testify in his individual capacity and on behalf of MEM where he was directly involved in the old files.
4. It appears that William Story did in essence reiterate MEM's legal arguments in his testimony, and answered the questions to the best of his knowledge, where he was involved. If for any reason the Commissioner's Staff and the Commissioners desires that MEM resubmits another testimony,

the undersigned will be very happy to do so.

5. As stated by the KCC Staff, William Story has never examined witnesses, the pleadings are not, in essence, the filing of pleadings, but only a respectful request to the Commission and the presentation of facts for the formal Hearing. If for any reason the undersigned did present or advance legal arguments as indicated by the KCC Staff, then it must be common knowledge because the undersigned does not have any legal training.

6. The second half of the Commissioners Staff's plea above asked to change the final rebuttal answers to be rescheduled to July 10, 2017. This is a catastrophic problem for MEM due to the fact that MEM's Operators License, after 28 years, expires on June 30, 2017. And without a renewal all of MEM's wells must be shut down because KCC Staff will not renew the license until MEM plugs a well that they do not operate, which is the subject of this Docket. This very important decision should be decided by the Commissioners at a formal hearing in the opinion of MEM.

7. If MEM's license is not renewed, MEM will be required to shut down all of its wells, in essence due to the fact that KCC Staff has the wrong categorization of this subject Cooley well that MEM does not own or operate for the past 20 years. Respectfully, the KCC Staff should extend the license renewal deadline to after the resolution of this subject Docket problem.

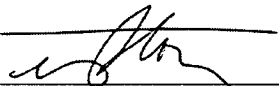
8. KCC Staff could also allow MEM the normal License Renewal process to take place prior to June 30, 2017. And then the regular scheduled Commission Hearing will occur on July 20, 2017 to determine the KCC Staff a final outcome on their part of this solution. If the KCC Staff is successful at the Commissioners formal hearing then the KCC Staff could impose the MEM's shut down of wells at that point.

9. This closing, shut down and non-operation of MEM's oil wells will create a total loss of revenue for MEM, if it were to occur. This shut down of all of the wells will also create down-hole damages to the wells and equipment and the possibility of additional legal activity for lost monetary considerations. The parties hereto should work together to resolve this problem and establish a new Operators License Renewal for MEM prior to June 30, 2017.

10. The above problems will not be necessary if KCC Staff will extend the June 30, 2017 License Renewal deadline or allow the License Renewal to occur on schedule until after this Docket resolution has been decided on July 20, 2017, where it is scheduled at the present time.

WHEREFORE, MEM and William Story respectfully does hereby request that the pre-filed direct testimony of William Story shall be accepted by the Commissioners as presented as of May 30, 2017 and that the KCC Staff's rebuttal's extension above, be denied. And also direct the approval to the Commission Staff to hereby allow MEM Operators License Renewal to occur until after this Docket solution is determined.

Respectfully submitted

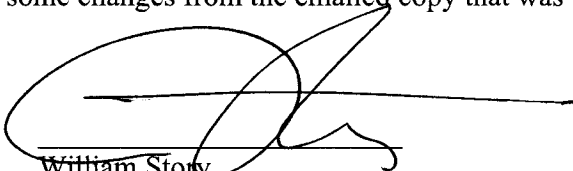
By 
William Story (as a non-attorney)
D/B/A MEM Partnership, LP Signature
P.O. Box 130832
Spring, Texas 77393
Phone: 936-828-6018

Note: This document was emailed to KCC Staff on June 7, 2017.

I certify that an original copy will be mailed to The KCC Staff on June 8, to KCC 266 N. Main, Suite 220, in Wichita, KS 67202 .

Please note that this mailed document has some changes from the emailed copy that was received by KCC Staff on June 7, 2017.

Approved and mailed on June 8, 2017


William Story

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