

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

Before Commissioners:

Jay Scott Emler, Chairman
Shari Feist Albrecht
Pat Apple

In the Matter of an Order to Show Cause)	Docket No.: 17-CONS-3099-CSHO
issued to IGWT, Inc. ("Operator") regarding)	
responsibility under K.S.A. 55-179 for the)	CONSERVATION DIVISION
Wernli #5, #7, #8, and #9 wells on the Wernli)	
lease in Greenwood County, Kansas)	License No.: 3167
_____)	

MOTION FOR CONTINUANCE

COMES NOW IGWT, INC., by and through counsel John G. Pike, and moves for a continuance of the hearing and all related testimony deadlines currently in place in this docket. In support of this motion IGWT shows as follows:

1. This docket seeks to determine the responsibility of IGWT to plug certain abandoned wells.
2. The Commission has opened docket no. 17-CONS-3362-CINV, *In the Matter of a General Investigation into Potential Commission Rulemaking Regarding Responsibility for Abandoned Wells*, which seeks to consider adoption by the Commission of new regulations governing plugging responsibility based on interpretation of applicable existing or revised Kansas statutes, and the results of said docket may significantly impact the outcome of this docket.
3. No testimony has been prefiled in this docket.
4. The wells at issue in this docket have not been alleged to be actively polluting any zones.

5. Given the pending docket noted above, it would not be in the best interests of any party to this docket to reach an outcome that may not be consistent with the results that may arise from the plugging docket noted above.

6. The current schedule in this docket is as follows:

Staff prefiled testimony due	January 20, 2017
IGWT prefiled testimony due	January 30, 2017
Staff rebuttal testimony due	February 10, 2017
Hearing	February 20, 2017

7. IGWT moves for a continuance as follows:

Staff prefiled testimony due	April 7, 2017
IGWT prefiled testimony due	April 17, 2017
Staff rebuttal testimony due	April 27, 2017
Hearing	May 18, 2017

Respectfully submitted,

/s/ John G. Pike
John G. Pike, #09938
Corey M. Adams #27253
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Attorneys for IGWT, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of January, 2017, I caused a true and correct copy of the foregoing *Motion for Continuance* to be served via hand delivery, to the following parties:

John McCannon
Ryan Hoffman
Jon Myers
Kansas Corporation Commission
130 S. Market, Room 2078
Wichita, KS 67202

/s/ John G. Pike _____
John G. Pike

VERIFICATION

STATE OF KANSAS }
 }
COUNTY OF SEDGWICK }

ss.

Corey M. Adams, of lawful age, and being first duly sworn upon oath, deposes and says:

he is an attorney for IGWT, Inc.; that he has read the within and foregoing Motion for Continuance; and the statements and contents thereof are true to the best of his knowledge and belief.

By: 
Corey M. Adams

Subscribed and sworn to before me this 18th day of January, 2017.


Mary K. Calisti
Notary Public

My Commission Expires:

May 28, 2018

