

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

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

In the matter of an Order to Show Cause ) Docket No.: 18-CONS-3098-CSHO  
issued to Bert Carlson ("Operator") regarding )  
responsibility under K.S.A. 55-179 for ) CONSERVATION DIVISION  
unplugged wells on an expired license. )  
\_\_\_\_\_ ) License No.: 32802

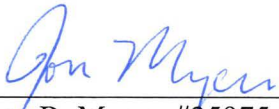
**MOTION TO RESCHEDULE PREHEARING CONFERENCE**

Commission Staff (Staff) of the State Corporation Commission of the State of Kansas  
(Commission) files this Motion. In support of its Motion, Staff states as follows:

1. On August 18, 2017, Commission Staff filed a Motion to Show Cause against Operator, due to two unplugged wells remaining on Operator's expired license. On October 19, 2017, the Commission issued an order, setting a November 14, 2017, prehearing conference.
2. At the November 14, 2017 prehearing conference, Staff noted that Operator is a debtor in a bankruptcy case, and that Staff has been contacted by an attorney on behalf of Operator in regard to this matter as it relates to the bankruptcy proceeding. Staff therefore requests that the prehearing conference be rescheduled for the third week of January 2018, at a date and time of the prehearing officer's choosing, to facilitate further conversation between Staff and Operator regarding how to best resolve this Commission docket. Staff has consulted with Operator's counsel, who is not opposed to this motion.

WHEREFORE, Staff requests this motion be granted.

Respectfully submitted,



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Jonathan R. Myers, #25975

Litigation Counsel

Kansas Corporation Commission


266 N. Main, Suite 220, Wichita, Kansas 67202

Phone: 316-337-6200; Fax: 316-337-6211

**VERIFICATION**

STATE OF KANSAS                     )  
  ) ss.  
COUNTY OF SEDGWICK            )

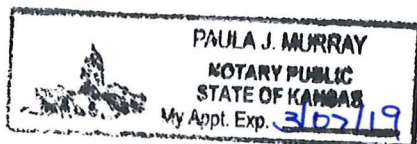
Jonathan R. Myers, of lawful age, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing *Motion*, and attests that the statements therein are true to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Jonathan R. Myers, S. Ct. #25975  
Litigation Counsel  
State Corporation Commission  
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 16 day of Nov, 2017.

  
\_\_\_\_\_  
Notary Public

My Appointment Expires: 3/07/19



**CERTIFICATE OF SERVICE**

I certify that on 11/16/17, I caused a complete and accurate copy of this Motion to be served via United States mail, with the postage prepaid and properly addressed to the following:

David Prella Eron  
Eron Law  
229 E. William, Suite 100  
Wichita, KS 67202

and delivered by e-mail to:

Jonathan R. Myers, Litigation Counsel  
KCC Central Office

Michael J. Duenes, Assistant General Counsel  
KCC Topeka Office

/s/ Paula J. Murray  
Paula J. Murray  
Legal Assistant  
Kansas Corporation Commission