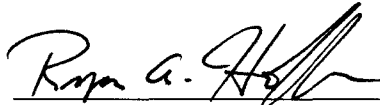




**WHEREFORE**, Staff prays that the Commission grant its motion in this matter and join Shell Rock as a party necessary to determine the party responsible to plug the abandoned wells on the Wernli lease in Greenwood County, Kansas.

Respectfully submitted,



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Ryan A. Hoffman, #23819  
Litigation Counsel  
Kansas Corporation Commission  
130 S. Market, Room 2078  
Wichita, Kansas 67202-3802  
316-337-6200  
[r.hoffman@kcc.ks.gov](mailto:r.hoffman@kcc.ks.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on 8/7/2012, I caused a true and correct copy of the foregoing "Motion to Join Party" to be served by placing the same in the United States mail, postage prepaid, and properly addressed to the following

Mark L. Haas  
1515 Ash St., Ste. 205  
Leawood, Kansas 66211

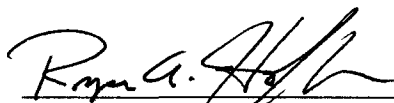
James G. Flaherty, Keith A. Brock  
Anderson & Byrd, LLP  
PO Box 17  
Ottawa, Kansas 66067  
*Attorneys for Mark L. Haas*

David L. Wernli  
Shell Rock Enterprises, Inc.  
1420 C of E Drive; Suite 140  
Emporia, Kansas 66801

John Almond, Mike Heffern  
KCC District #3 Office  
1500 W. Seventh  
Chanute, Kansas 66720

And by hand delivery to the following:

Barbara Montgomery  
Environmental Protection and Remediation Department



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Ryan A. Hoffmann  
Litigation Counsel  
Kansas Corporation Commission