

**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 Global Energy)	Docket No.: 17-CONS-3697-CPEN
Solutions Inc. ("Operator") to comply with)	CONSERVATION DIVISION
K.A.R. 82-3-120.)	
_____)	License No.: 32316

Request for Hearing

Global Energy Solutions, Inc. ("Operator"), by and through its counsel, James G. Faherty and Jeffrey A. Wilson, Anderson & Byrd, LLP, hereby moves the Kansas Corporation Commission ("Commission") for hearing in this matter. In support of its Request, Operator states:

1. Operator submitted an application to renew its license well in advance of the expiration of its license.
2. Operator was informed by the Commission after submitting its renewal application that its license would not be renewed unless it accepted plugging responsibility for all of the wells listed on Exhibit "A", attached hereto.
3. Operators does not have plugging liability for all of the wells outlined in Exhibit A.
4. The Commission sent Operator a letter on or about June 1, 2017 ("June 1 Letter") informing Operator that its license had expired and that the same wells listed on Exhibit A were unplugged and in violation of Commission regulations.
5. The June 1 Letter required a response, if any, on or before June 15, 2017.

6. On June 15, 2017, Operator, through its counsel, sent a letter to Cynthia K. Maine at c.maine@kcc.ks.gov and Joshua Wright at j.wright@kcc.ks.gov requesting a hearing and disputing the authority and reasonableness of denying Operator's license for refusing to accept responsibility for plugging wells that it has no responsibility for ("Request for Hearing").

7. The June 1 Letter essentially operated as a refusal to renew Operator's license, which order did not become final until the time period for seeking review of that decision has completely run. K.S.A. 77-511(d); K.S.A. 77-537(b)(3).

8. As a result of Operator's timely dispute of the June 1 Letter in its Request for Hearing, Operator's license continues to be in existence until the order denying its renewal becomes final. K.S.A. 77-511(d).

9. Therefore, penalizing Operator in this docket for an unplugged well remaining on Operator's license while said license is expired is entirely inappropriate and unreasonable as Operator's license continues in full force pending final resolution of the refusal to renew its license.

WHEREFORE, Operator prays the KCC vacate the penalty assessed in this docket without holding a hearing herein. In the alternative, Operator requests a hearing in this matter.

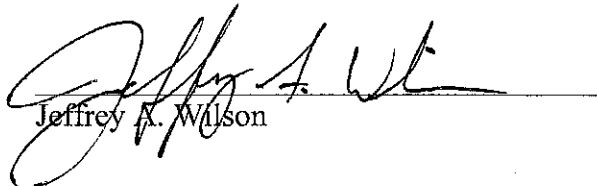
/s/ Jeffrey A. Wilson
Jeffrey A. Wilson #26527
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VERIFICATION

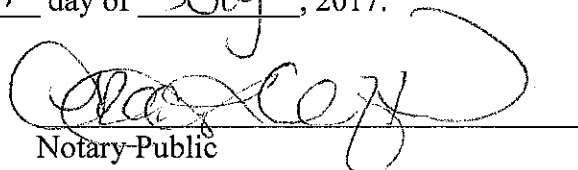
STATE OF KANSAS)
) ss:
COUNTY OF FRANKLIN)

Jeffrey A. Wilson, of lawful age, being first duly sworn, upon oath states:

That he is an attorney for Global Energy Solutions, Inc., that he has read the above and foregoing Request, knows the contents thereof, knows that all the statements made therein are true, and is authorized to make this Request for the Operator.


Jeffrey A. Wilson

Subscribed and sworn to before me this 7th day of July, 2017.


Notary-Public

My appointment expires:



CERTIFICATE OF SERVICE

On this 7 day of July, 2017, the undersigned certifies that he served a copy of the foregoing via first class mail, postage prepaid, and email as follows:

Joshua Wright
KCC Litigation Counsel
266 N. Main St., Suite 220
Wichita, KS 67202
j.wright@kcc.ks.gov

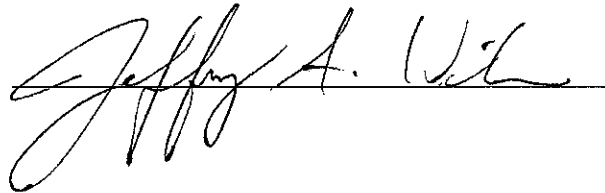
A handwritten signature in black ink, appearing to read "Jeffrey A. Wilk", is written over a horizontal line.

Exhibit A

Global Energy Solutions Inc License: 32316

<u>Unplugged Wells on Operator's License</u>			
API Well #	Lease Name / Well #	Well Location	County
15-087-20012-00-01	BOWER 1	5-10S-20E, SWNE	JEFFERSON
15-087-20015-00-01	BOWER 2	5-10S-20E, SESE	JEFFERSON
15-087-20057-00-00	BOWER 3	5-10S-20E, SWSE	JEFFERSON
15-087-20058-00-01	BOWER 4	5-10S-20E, NESE	JEFFERSON
15-087-20083-00-00	BOWER 6	5-10S-20E, N2S2NE	JEFFERSON
15-087-20093-00-00	DECKER 2	36-9S-19E, E2SESE	JEFFERSON
15-087-20131-00-00	COPPINGER 1	26-9S-19E, NENESE	JEFFERSON
15-087-20155-00-00	COPPINGER 3	26-9S-19E, SESESE	JEFFERSON
15-087-20308-00-01	BOWER OWWO 2-A	5-10S-20E, E2SE	JEFFERSON
15-087-20313-00-00	BOWER 5-A	5-10S-20E, S2S2NE	JEFFERSON
15-087-20324-00-00	BOWER 6-A	5-10S-20E, E2NENE	JEFFERSON
15-087-20328-00-00	BOWER 8-A	5-10S-20E, SESENE	JEFFERSON
15-087-20399-00-00	WILMER KIMMEL 1-87	1-10S-19E, NWSENE	JEFFERSON
15-087-20448-00-00	KIMMEL WILMER 1-89	1-10S-19E, E2NWNENE	JEFFERSON
15-103-19105-00-00	FUHR 1	3-9S-20E, SESENE	LEAVENWORTH
15-103-21099-00-00	FUHR 103	3-9S-20E, SESENE	LEAVENWORTH
15-103-21174-00-00	DEMORANVILLE 6 (COG 104)	3-9S-20E, NWSENE	LEAVENWORTH
15-103-21175-00-00	DEMORANVILLE (COG 105)	3-9S-20E, SWSENE	LEAVENWORTH
15-103-21176-00-00	DEMORANVILLE 8 (COG 106)	3-9S-20E, NWSENE	LEAVENWORTH