

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

In the Matter of the Application of Quito, Inc. ) Docket No: 25-CONS-3245-CMSC  
(Applicant) for an Operator's License. )  
) CONSERVATION DIVISION  
)  
\_\_\_\_\_ ) License No: N/A

**REQUEST FOR HEARING**

COMES NOW Quito, Inc. ("Applicant"), by and through its attorney, John R. Horst, and requests a hearing in connection with the Order Denying Application for License that was issued by the Commission in this docket on January 28, 2025.

In support of its Request for Hearing, Quito, Inc., submits the following:

Any association which Applicant or its principal, Mark W. McCann, may currently have, or which may have previously existed with McC Oil Company, Inc.; Wildcat Energy, Inc., and Thor Operating, LLC, may have a bearing upon the Applicant's financial responsibility obligations under K.S.A. 55-155(d)(3), but such current or previously existing associations do not violate K.S.A. 55-155(c) and K.A.R. 82-3-120.

WHEREFORE, Quito, Inc. requests that this matter be set for hearing, and for such additional relief as the Commission finds just and equitable.

SUBMITTED BY:

JOHN R. HORST, P.A.

By [Signature]

JOHN R. HORST  
207 W. FOURTH AVE.  
P.O. BOX 560  
CANEY, KS 67333  
jrhorst48@yahoo.com  
Attorney for Quito, Inc.  
Our File #2844  
S. Ct. #09412

STATE OF KANSAS )  
 )SS:  
COUNTY OF MONTGOMERY )

John R. Horst, of lawful age, being first duly sworn, upon his oath states:

That he is the attorney for Quito, Inc., above-named; that he has read and signed the foregoing document; and that the statements therein contained are true and correct according to his knowledge, information, and belief.

[Signature]  
John R. Horst

Subscribed and sworn to before me this 6<sup>th</sup> day of February, 2025.

[Signature]  
NOTARY PUBLIC

My Appointment Expires:

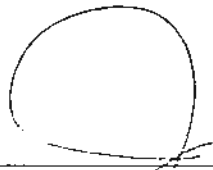


CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 10<sup>th</sup> day of February, 2025, the above and foregoing Request for Hearing was electronically filed and a copy emailed to:

Nancy Borst  
Kansas Corporation Commission  
Central Office  
266 N. Main St., Ste. 220  
Wichita, KS 67202-1513  
nancy.borst@ks.gov

Kelcey Marsh, Litigation Counsel  
Kansas Corporation Commission  
Central Office  
266 N. Main St, Ste 220  
Wichita, KS 67202-1513  
Fax: 785-271-3354  
kelcey.marsh@ks.gov

  
\_\_\_\_\_  
JOHN R. HORST