## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the matter of the failure of Agricultural	)	Docket No.: 20-CONS-3021-CPEN
Energy Services ("Operator") to comply with	)	
K.A.R. 82-3-111 at the Langhofer #1 in	)	CONSERVATION DIVISION
Seward County, Kansas.	)	
	)	License No.: 34089
	)	

## AGRICULTURAL ENERGY SERVICES' WRITTEN REQUEST FOR HEARING

COMES NOW AGRICULTURAL ENERGY SERVICES (hereinafter "Operator") by and through its attorney, Lee Thompson, Thompson Law Firm, L.L.C., and for its written request for hearing in the captioned matter in accordance with the Kansas administrative procedure act and states as follows:

- Applicant is a corporation organized to do business in the State of Kansas and has been issued a license to conduct oil and gas activities by the Kansas Corporation Commission ("Commission") under Operator License Number 34089.
- On July 18, 2019, the Commission sent a Notice of Penalty Assessment to the
   Operator in connection with a Penalty Order alleging violation of K.A.R. 82-3-111.
- 3. The Operator has been hampered by corn crops making it impossible to access the well for plugging until after harvest and a hospital stay for one of the company's

- officers. Operator respectfully submits that it is and has responded as possible within a timely fashion.
- 4. A hearing is requested to address the issue of whether or not compliance with regulations by the Operator was timely and whether the penalty assessed is appropriate under the law and the facts.

Respectfully Submitted AGRICULTURAL ENERGY SERVICES, INC.

## By s/ Lee Thompson

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**Attorney for Operator** 

## **CERTIFICATE OF SERVICE**

I hereby certify on this 20th day of August, 2019, the above and foregoing written request for a hearing was filed in the referenced docket by the express electronic filing system upon the Kansas Corporation Commission, Conservation Division at 266 N. Main, Suite 220, Wichita Kansas as directed in the Notice of Penalty Assessment.

s/ Lee Thompson

LEE THOMPSON