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

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In the Matter of the Failure of Haas Petroleum, LLC (Operator) to Comply with K.A.R. 82-3-407 at the Dehlinger A #12 A Well in Greenwood County, Kansas. Docket No. 23-CONS-3061-CPEN

CONSERVATION DIVISION License No.: 33640

## **REQUEST FOR HEARING**

Haas Petroleum, LLC ("Haas") by and through its counsel, Keith A. Brock, Anderson & Byrd, LLP, hereby requests a hearing in the above referenced matter as it relates to the Dehlinger A #12 A Well pursuant to K.S.A. 55-164; K.S.A. 77-537 and K.S.A. 77-542. In support of this request, Haas states as follows:

1. An evidentiary hearing should be held in this matter concerning the penalty issued for the Dehlinger A #12 A Well to determine whether Haas is responsible for the care and control of said well and to determine if an actual violation of K.A.R. 82-3-407 occurred and if so whether the assessed penalty is consistent with the requirements of K.A.R. 82-3-407 or other applicable law.

WHEREFORE, Haas Petroleum, LLC prays for an order setting the above captioned docket for hearing pursuant to K.S.A. 55-164; K.S.A. 77-537 and K.S.A. 77-542.

Keith A. Brock, #24130 **ANDERSON & BYRD, LLP** 216 S. Hickory ~ P.O. Box 17 Ottawa, Kansas 66067 (785) 242-1234, telephone (785) 242-1279, facsimile <u>kbrock@andersonbyrd.com</u> Attorneys for Haas Petroleum, LLC

## STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

Keith A. Brock, of lawful age, being first duly sworn on oath, states: That he is the attorney for Haas Petroleum, LLC, and is duly authorized to make this affidavit; that he has read the foregoing Request for Hearing, knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.

Keith A. Brock

SUBSCRIBED AND SWORN to before me this 29th day of September, 2022.



Ronda Rossman

Notary Public

Appointment/Commission Expires:

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via U. S. Mail, postage prepaid, or electronically, this 29<sup>th</sup> day of September, 2022, addressed to:

Mark L. Haas Haas Petroleum, LLC P.O. Box 8396 Prairie Village, KS 66208-0396

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Keith A. Brock