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

In the Matter of the Failure of Little Chief Energy Corporation (Operator) to Comply with K.A.R. 82-3-120 and K.A.R. 82-3-133 by Operating Under a Suspended License.

Docket No. 21-CONS-3200-CPEN

## **REQUEST FOR HEARING**

Little Chief Energy Corporation by and through its counsel, Keith A. Brock, Anderson & Byrd,

)

)

)

)

LLP, hereby requests a hearing in the above referenced matter pursuant to K.S.A. 55-164; K.S.A.

77-537 and K.S.A. 77-542. In support of this request, Little Chief Energy Corporation states as

follows:

1. An evidentiary hearing should be held in this matter to determine if an actual violation

of K.A.R. 82-3-120 and K.A.R. 82-3-133 occurred and if so whether the assessed penalty is consistent with the requirements of K.A.R. 82-3-120 and K.A.R. 82-3-133 or other applicable law.

WHEREFORE, Little Chief Energy Corporation 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 Little Chief Energy Corporation

## 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 Little Chief Energy Corporation, 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 9<sup>th</sup> day of June, 2021.

NOTARY PUBLIC - State of Kansas RONDA ROSSMAN My Appt. Exp. 5/95/99

Rouda Rossinger

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 9<sup>th</sup> day of June, 2021, addressed to:

John Almond j.almond@kcc.ks.gov

Daniel Fox d.fox@kcc.ks.gov

Kelcey Marsh k.march@kcc.ks.gov

Troy Russell t.russell@kcc.ks.gov

Bryon R. Boles Little Chief Energy Corporation P. O. Box 965 Independence, Kansas 67301-0965

Keith A. Brock