

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Failure of Clark Energy, )  
LLC (Operator) to Comply with K.A.R. )  
82-3-111 at Seventy-Three Wells in Chautauqua ) Docket No. 22-CONS-3033-CPEN  
and Montgomery Counties, Kansas. )

**REQUEST FOR HEARING**

Clark Energy, LLC 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, Clark Energy, LLC states as follows:

1. An evidentiary hearing should be held in this matter to determine if an actual violation of K.A.R. 82-3-111 occurred and if so whether the assessed penalty is consistent with the requirements of K.A.R. 82-3-111 or other applicable law.

WHEREFORE, Clark Energy, 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  
[kbrock@andersonbyrd.com](mailto:kbrock@andersonbyrd.com)  
Attorneys for Clark Energy, 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 Clark Energy, 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 20<sup>th</sup> day of August, 2021.



Notary Public

Appointment/Commission Expires:

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 20<sup>th</sup> day of August, 2021, addressed to:

Randy Clark  
[rw\\_clark@yahoo.com](mailto:rw_clark@yahoo.com)

Tristan Kimbrell  
[t.kimbrell@kcc.ks.gov](mailto:t.kimbrell@kcc.ks.gov)

John Almond  
[j.almond@kcc.ks.gov](mailto:j.almond@kcc.ks.gov)

Troy Russell  
[t.russell@kcc.ks.gov](mailto:t.russell@kcc.ks.gov)



Keith A. Brock