

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

In the matter of the failure of Quito, Inc.) Docket No: 24-CONS-3072-CPEN
("Operator") to comply with K.A.R. 82-3-120.)
) CONSERVATION DIVISION
)
)
_____) License No: 33594

REQUEST FOR HEARING

COMES NOW Quito, Inc. ("Operator"), by and through its attorney, John R. Horst, and requests a hearing in connection with the Penalty Order that was issued by the Commission in this docket on September 26, 2023.

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

Operator has not operated any of the Subject Wells subsequent to February 9, 2023. Prior to August 28, 2023, Operator transferred certain of the Subject Wells to another operator. The Commission's Order is based upon an incorrect construction of 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


JOHN R. HORST
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Attorney for Quito, Inc.
Our File #2844.1
S. Ct. #09412

STATE OF KANSAS)
)SS:
COUNTY OF MONTGOMERY)

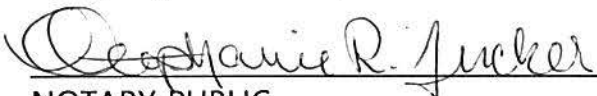
John R. Horst, of lawful age, being first duly sworn, upon his oath states:

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.



John R. Horst

Subscribed and sworn to before me this 24th day of October, 2023.



NOTARY PUBLIC

My Appointment Expires:

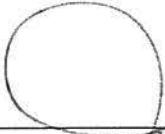


CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 24th day of October, 2023, the above and foregoing Request for Hearing was electronically filed and a copy emailed to:

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JOHN R. HORST