

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

In the matter of the failure of Benjamin M. Giles
("Operator") to comply with K.A.R. 82-3-120

Docket No. 20-CONS-3082-CPEN

CONSERVATION DIVISION

License No. 5446

**STATEMENT IN SUPPORT OF
PETITION FOR INTERVENTION**

The Unsecured Creditors' Committee of MWM Oil Company Inc. of MWM Oil Company, Inc. (the "Committee"), by and through its counsel Eron Law, P.A., hereby submits this Statement in Support of the Petition For Intervention filed by Petitioners MWM Oil Company, Inc. and RAG Oil Co., LLC (collectively, the "Petitioners"), and in support states as follows:

1. On October 15, 2019, the United States Trustee appointed the Unsecured Creditors' Committee of MWM Oil Company, Inc. (the "Committee") to represent unsecured creditors of the Petitioners in the Chapter 11 bankruptcy matter of MWM Oil Company, Inc., D. Kan. Bankr. Case No. 19-11404-11. The Committee has retained Eron Law, P.A. as counsel.

2. The Committee hereby joins in all respects regarding the Petition for Intervention filed by Petitioners, wherein Petitioners are owners of working interests and overriding royalty interests in the wells described in Exhibit A of the Penalty Order ("Subject Wells").

3. The only likely possibility for the Committee to recover any of the money owed to the unsecured creditors by the Petitioners or Benjamin M. Giles (the "Operator") is if the Subject Wells and their corresponding leases are sold for maximum value. A potential shutdown of the Subject Wells would dramatically reduce that value.

4. The Subject Wells have currently been noticed for Auction to be held on December 5, 2019, and will have a new operator very shortly.

WHEREFORE, the Committee hereby supports the Petition for Intervention and respectfully requests that the Commission enter an order allowing the current Operator to continue operation of the Subject Wells so that they may be sold at auction for maximum value and transferred to a responsible party.

Respectfully Submitted:

ERON LAW, P.A.
Attorneys for the
Unsecured Creditors' Committee
Of MWM Oil Company, Inc.

/s/ David Prella Eron
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CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2019, a true and correct copy of the foregoing was electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas, which sent notification to all parties of interest participating in the Commission's electronic system.

/s/ Margaret R. Spangler
MARGARET R. SPANGLER
Assistant to David Prella Eron

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**VERIFICATION OF
STATEMENT IN SUPPORT OF
PETITION FOR INTERVENTION**

I, DAVID PRELLE ERON, of lawful age, do solemnly swear, and sincerely and truly declare and affirm that:

1. I am a board certified business bankruptcy specialist, certified by the American Board of Certification.

2. I am an attorney for Unsecured Creditors' Committee of MWM Oil Company Inc. of MWM Oil Company, Inc. (the "Committee") and I am employed by the Committee, which seeks to file the foregoing Statement in Support of Petition For Intervention (the "Pleading").

3. I have actual knowledge of the truth of the statements made in the Pleading and have reasonable grounds to believe that the statements are true.

WHEREFORE, I hereby verify the statements and contents of the Statement in Support of Petition for Intervention, and I do this under the pains and penalties of perjury, so help me God.

/s/ David Prella Eron

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