

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

<b>IN THE MATTER OF THE NOTICE )</b>	<b>Docket No.: 16-CONS-610-CMSC</b>
<b>OF DENIAL OF LICENSE RENEWAL )</b>	
<b>APPLICATION ISSUED TO )</b>	<b>CONSERVATION DIVISION</b>
<b>ANDERSON EXPLORATION, LLC )</b>	
<b>("OPERATOR") )</b>	<b>License No.: 34991</b>

**PETITION TO INTERVENE**

COMES NOW, Thomas L. Knoll, Steven J. Knoll, and Patricia S. Knoll ("Petitioners") and, pursuant to Kan. Stat. Ann. § 77-521 and Kan. Admin. Reg. § 82-1-225, requests permission from the Commission to intervene and participate in this docket. Petitioners allege and state the following in support of its Petition:

1. Petitioners are residents of the State of Kansas with addresses as follows:
  - a. Thomas L. Knoll, 606 W. Summer, Morland, KS 67650;
  - b. Steven J. Knoll, 615 W. 7<sup>th</sup>, LaCrosse, KS 67548;
  - c. Patricia S. Knoll, 2704 Epworth #9, Hays, KS 67601
2. That Petitioners are the owners of all of the oil, gas, and other minerals in and under the following described Land:

South 280 Acres of the West Half (S 280A of the W/2) of Section Twenty-six (26), Township Ten (10) South, Range Twenty-five (25) South of the 6<sup>th</sup> P.M., Graham County, Kansas.
3. That on March 28, 2014, Petitioners executed an Oil and Gas Lease, filed in Book 266, Page 735, granting Anderson Exploration, LLC the right to explore and develop the above described Land.
4. That Petitioners, in addition to their interest in the oil, gas, and other minerals, each own an undivided 0.0083594 working interest and an undivided .02083333 overriding royalty interest in and to the above described Oil and Gas Lease.

5. That Petitioner, Thomas L. Knoll, has performed pumping services for Anderson Exploration, LLC on the above described Lease and has actual knowledge of the operation of said Lease.

6. That Petitioners object to the renewal of Anderson Exploration, LLC's operating license.

7. That Petitioners wish to offer testimony to the Commission supporting the non-renewal of Anderson Exploration, LLC's operating license.

8. That Petitioners' legal rights, duties, privileges, immunities, or other legal interests may be substantially effected by this proceeding. Specifically, Anderson Exploration, LLC has failed to prudently operate the above described Oil and Gas Lease, has committed physical and economic waste in its operation of the Lease, and has otherwise harmed the interests of the Petitioners.

9. That Petitioners' intervention will not impair the interests of justice and the orderly and prompt conduct of the proceedings.

WHEREFORE, Petitioners request that the Commission issue an order authorizing Petitioner's intervention in these proceedings; require that Petitioners be served with all pleadings, discovery, testimony, and orders herein; allow Petitioners to participate in this docket and to offer testimony; and grant to Petitioner such other and further relief as the Commission deems just and proper.

RESPECTFULLY SUBMITTED

By: 

Michael J. Baxter #26459

Tyler K. Turner #25483

JETER LAW FIRM, LLP

P.O. Box 128

Hays, KS 67601

(785) 628-8226

*Attorney for Thomas L. Knoll, Steven J.*

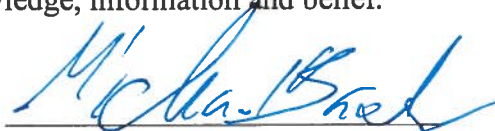
*Knoll and Patricia S. Knoll*

**VERIFICATION**

STATE OF KANSAS

COUNT OF ELLIS


Michael J. Baxter, of lawful age and being first duly sworn upon his oath, deposes and states: That he is the Attorney for Thomas L. Knoll, Steven J. Knoll and Patricia S. Knoll in the above-captioned action; that he has read the above and foregoing Petition to Intervene, knows and understands the contents thereof, and states that the statements and allegations therein contained are true and correct according to his knowledge, information and belief.



Michael J. Baxter

Subscribed and sworn to before me, the undersigned authority, this 7<sup>th</sup> day of December, 2015.

My commission expires:

  
Sue Prediger, Notary Public



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this 7<sup>th</sup> day of December, 2015, he caused the above and foregoing Petition to Intervene to be filed with the Kansas Corporation Commission, Conservation Division, in accordance with the Commissions e-filing rules, and that he caused a true and correct copy of the same to be served via US Mail, postage prepaid, hand-delivered or e-filed, to the following persons at the addresses shown:

D. Dean Anderson  
Anderson Exploration LLC  
168 S. Lark Lane  
Wichita, Kansas 67209

Lane Palmateer  
Conservation Division Central Office  
266 N. Main, Suite 200  
Wichita, Kansas 67202

  
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Michael J. Baxter