# BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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In the matter of the failure of Prairie Gas Operating, LLC ("Operator") to comply With K.A.R. 82-3-111 at the Watson # 1 and Earl #1 in Greeley County, Kansas.

Docket No.: 20-CONS-3129-CPEN CONSERVATION DIVISION

License No.: 35442

# PRAIRIE GAS OPERATING, LLC'S WRITTEN REQUEST FOR HEARING

COMES NOW PRAIRIE GAS OPERATING, LLC (hereinafter "Operator") by and

through its attorney, Lee Thompson, Thompson Law Firm, L.L.C., and for its written request for hearing in the captioned matter in accordance with the Kansas administrative procedure act and states as follows:

- Applicant is a limited liability company organized to do business in the State of Kansas and has been issued a license to conduct oil and gas activities by the Kansas Corporation Commission ("Commission") under Operator License Number 35442.
- 2. The Commission has entered a Penalty Order in the captioned docket alleging violation of K.A.R. 82-3-407.

3. A hearing is requested to address the issue of whether or not compliance with regulations by the Operator was timely and whether the penalty assessed is appropriate under the law and the facts.

Respectfully Submitted PRAIRIE GAS OPERATING, LLC

#### By s/ Lee Thompson

LEE THOMPSON, #08361 THOMPSON LAW FIRM, LLC 106 East 2nd Street N Wichita, Kansas 67202-2005 Phone: (316) 267-3933 Facsimile: (316) 267-3901 Ithompson@tslawfirm.com

# **Attorney for Operator**

#### VERIFICATION

STATE OF KANSAS ) ) ss: COUNTY OF SEDGWICK )

Lee Thompson, of lawful age, being first duly sworn upon his oath states that he is an attorney for the Operator named herein and states that he prepared the foregoing Written Request for Hearing and declares that the statements made therein are true and correct to the best of his knowledge and belief.

LEE THOMPSON

SUBSCRIBED AND SWORN to before me this 12th day of December, 2019.



Notary Public

My Appointment Expires: 2/24 (2021

### **CERTIFICATE OF SERVICE**

I hereby certify on this 12th day of December 2019, the above and foregoing written request for a hearing was filed in the referenced docket by the express electronic filing system which will also serve notice upon the Kansas Corporation Commission, Conservation Division at 266 N. Main, Suite 220, Wichita Kansas as directed in the Notice of Penalty Assessment.

s/ Lee Thompson