BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the matter of the failure of)	Docket No.: 22-CONS-3119-CPEN
Midwest Oil, LLC (Operator))	
to comply with K.A.R. 82-3-120.)	CONSERVATION DIVISION
)	
)	License No.: 34497

REQUEST FOR HEARING

Respondent, Midwest Oil, LLC, by and through counsel, requests a hearing in this matter in regard to the alleged violation of K.A.R. 82-3-120 and imposition of penalty. In support hereof, Respondent alleges and states:

- 1. Respondent has in prior years utilized the services provided by Drill Baby Drill, LLC to submit its annual application for renewal of operator license with the KCC Conservation Division. Respondent utilized the services of Drill Baby Drill for submission of the current year's renewal application, and believed that all necessary paperwork and fees had been submitted in a timely manner.
- 2. Respondent received the Notice of Violation dated July 27, 2021 and immediately contacted the service provider, Drill Baby Drill, regarding same. Respondent was informed that the matter would be taken care of.
- Respondent was unaware that any necessary paperwork for renewal of its operator license had not been taken care of by Drill Baby Drill until receipt of the Penalty Order.
- 4. Respondent will undertake to assure that whatever hasn't been done to renew its license will be done as soon as possible.

WHEREFORE, Respondent requests a hearing and requests that the finding of violations be set aside, that no penalty be imposed, and that Respondent be permitted to renew its operator license.

John C. Chappell

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Email: jchappell@jchap.com Attorney for Respondent

CERTIFICATE OF SERVICE

I certify that on <u>09/15/2021</u> the foregoing or annexed pleading was e-filed with the Kansas Corporation Commission and

mailed first class postage prepaid to:

KCC Conservation Division 266 N. Main St., Ste. 220 Wichita, KS 67202-1513 Lynn M. Retz Executive Director KCC Conservation Division 266 N. Main St., Ste. 220 Wichita, KS 67202-1513

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