

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

Before Commissioners: Andrew J. French, Chairperson
 Dwight D. Keen
 Annie Kuether

In the matter of the failure of Agricultural)	Docket No. 26-CONS-3009-CPEN
Energy Services (Operator) to comply with)	
K.A.R. 82-3-111 at the Nix #1-15 in Seward)	CONSERVATION DIVISION
County, Kansas)	
_____)	License No.: 34089

REQUEST FOR HEARING

COMES NOW, Agricultural Energy Services, Inc., by and through counsel and pursuant to K.S.A. § 55-164, § 77-537 and § 77-542, and hereby requests a hearing before the Commission on the Penalty Order filed herein.

By the letter dated April 10, 2025, the Commission notified Agricultural Energy Services, Inc., that the Nix #1-15 Well (API 15-175-21264-00-01) was inactive and unplugged for longer than 90 days. On July 3, 2025, a Penalty Order issued stating the Well was not in compliance.

Agricultural Energy Services, Inc., requests a hearing to address the Commission's concerns, obtain additional time to comply with the Commission's Rules and Orders and obtain the approval of its application for TA.

WHEREFORE, Agricultural Energy Services, Inc. hereby requests a hearing on the Penalty Order issued herein.

Respectfully submitted,



Karl F. Hirsch, KSCT NO. 23274
HIRSCH, HEATH & WHITE, PLLC
901 Cedar Lake Boulevard
Oklahoma City, Oklahoma 73114
Telephone: (405) 235-1768
Facsimile: (405) 608-4913
khirsch@hhwlawfirm.com
Attorney for Agricultural Energy Services, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above and foregoing was served via email and by U.S. Mail, on the following counsel of record, this 1st day of August 2025.

Celeste Cheney-Tucker, Executive Director
Kansas Corporation Commission
Central Office
266 N. Main St., Ste. 220
Wichita, KS 67202-1513
celeste.cheney-tucker@ks.gov

Kelcey Marsh, Litigation Counsel
Kansas Corporation Commission
Central Office
266 N. Main St., Ste. 220
Wichita, KS 67202-1513
kelcey.marsh@ks.gov

Fred MacLaren
Kansas Corporation Commission
District Office No. 1
210 E. Frontview, Suite A
Dodge City, KS 67801
frederic.maclaren@ks.gov

Kenny Sullivan, District #1 Supervisor
Kansas Corporation Commission
District Office No. 1
210 E. Frontview, Suite A
Dodge City, KS 67801
kenny.sullivan@ks.gov

Robyn Stalkfleet, Admin. Specialist
Kansas Corporation Commission
District Office No. 1
210 E. Frontview, Suite A
Dodge City, KS 67801
robyn.stalkfleet@ks.gov



KARL F. HIRSCH