

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Failure of Kansas Resource	)	Docket No.: 17-CONS-3042-CPEN
Exploration & Development, LLC ("Operator") to	)	
Comply with K.A.R. 82-3-407 at the Joeckel	)	CONSERVATION DIVISION
#CW 8 in Miami County, Kansas.	)	License No.: 34592

**REQUEST FOR A HEARING**

Kansas Resource Exploration & Development, LLC, by and through its counsel, Keith A. Brock, Anderson & Byrd, LLP, hereby requests a hearing in the above referenced matter pursuant to K.S.A. 55-164; K.S.A. 77-537 and K.S.A. 77-542. In support of this request, Kansas Resource Exploration & Development, LLC states as follows:

1. An evidentiary hearing should be held in this matter to determine if Kansas Resource Exploration & Development, LLC was in compliance with all commission rules, regulations and directions from staff.
2. The Penalty Order issued in this Docket is unreasonable.

WHEREFORE, Kansas Resource Exploration & Development, LLC prays for an order setting the above captioned docket for hearing pursuant to K.S.A. 55-164; K.S.A. 77-537 and K.S.A. 77-542.



Keith A. Brock #24130

**ANDERSON & BYRD, LLP**

216 S. Hickory, P. O. Box 17

Ottawa, Kansas 66067

(785) 242-1234, telephone

(785) 242-1279, facsimile

[kbrock@andersonbyrd.com](mailto:kbrock@andersonbyrd.com)

Attorneys for Kansas Resource Exploration &  
Development, LLC

STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

Keith A. Brock, of lawful age, being first duly sworn on oath, states: That he is the attorney for Kansas Resource Exploration & Development, LLC, and is duly authorized to make this affidavit; that he has read the foregoing Request for Hearing, knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.

  
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Keith A. Brock

SUBSCRIBED AND SWORN to before me this 20<sup>th</sup> day of September, 2016.



  
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Notary Public

Appointment/Commission Expires:

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via U.S. Mail, postage prepaid, hand-delivery, or electronically, this 20<sup>th</sup> day of September, 2016, addressed to: Jonathan R. Myers, Litigation Counsel, Kansas Corporation Commission, Conservation Division, 266 N. Main Street, Suite 220, Wichita, Kansas 67202-1513, [j.myers@kcc.ks.gov](mailto:j.myers@kcc.ks.gov).

  
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Keith A. Brock