## BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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In the Matter of the Failure of JTC Oil, Inc. (Operator) to Comply with K.A.R. 82-3-111 at Eighty-Three Wells in Anderson, Franklin and Miami Counties, Kansas. Docket No. 25-CONS-3332-CPEN

CONSERVATION DIVISION License No. 32834

## **ENTRY OF APPEARANCE AND REQUEST FOR HEARING**

Keith A. Brock, Anderson & Byrd, LLP, hereby enters his appearance in the above captioned matter on behalf of JTC Oil, Inc.

JTC Oil, Inc., 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, JTC Oil, Inc. states as follows:

1. An evidentiary hearing should be held in this matter to determine if an actual violation

of K.A.R. 82-3-111 occurred, and if so, whether the assessed penalty is consistent with the requirements of applicable law.

WHEREFORE, JTC Oil, Inc. 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.

/s/ Keith A. Brock

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 Attorneys for JTC Oil, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 21<sup>st</sup> day of April, 2025, addressed to:

Tristan Kimbrell <u>t.kimbrell@kcc.ks.gov</u>

Troy Russell <u>t.russell@kcc.ks.gov</u> Ryan Duling <u>r.duling@kcc.ks.gov</u>

Tom Cain 2tjcain@gmail.com

/s/ Keith A. Brock Keith A. Brock