

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Failure of River Rock)	Docket No.: 17-CONS-3489-CPEN
Operating, LLC ("Operator") to Comply with)	
K.A.R. 82-3-407 at the W Hahn #I-1 in)	CONSERVATION DIVISION
Labette County, Kansas.)	License No.: 35341

REQUEST FOR A HEARING

River Rock Operating, 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, River Rock Operating, LLC states as follows:

1. An evidentiary hearing should be held in this matter to determine if River Rock Operating, LLC is responsible for the physical operation and control of the W Hahn #I-1 well, API #15-099-19087-00-01, located in Section 2, Township 35 South, Range 17 East, Labette County, Kansas.

2. The Penalty Order issued in this Docket is unreasonable.

WHEREFORE, River Rock Operating, 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

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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 River Rock Operating, 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.



Keith A. Brock

SUBSCRIBED AND SWORN to before me this 21st day of February, 2017.





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 21st day of February, 2017, 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.



Keith A. Brock