

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners:     Dwight D. Keen, Chair  
                                  Shari Feist Albrecht  
                                  J. Scott Emler

IN THE MATTER OF THE FAILURE OF ) DOCKET NO. 19-CONS-3271-CPEN  
QUITO, INC. (“OPERATOR”) TO COMPLY )  
WITH K.A.R. 82-3-111 AT THE SOLOMON ) CONSERVATION DIVISION  
#3 AND SOLOMON #5 IN CHAUTAUQUA )  
COUNTY, KANSAS. ) LICENSE NO. 33594

---

**REQUEST FOR HEARING**

COMES NOW Quito, Inc. (“Applicant”), by and through its attorney, Jeff Kennedy of Martin, Pringle, Oliver, Wallace & Bauer, L.L.P., and requests a hearing in connection with the Order that was issued by the Commission in this docket on February 26, 2019.

In support of its Request for Hearing, Quito, Inc., submits the following:

With respect to the Solomon #3 and Solomon #5 wells, Quito, Inc., intends to file a form to allow Temporary Abandonment Authority for these wells. The Commission’s staff has imposed unfair restrictions on testing these wells, which will be the basis for the hearing.

WHEREFORE, Quito, Inc. requests that this matter be set for hearing, and for such additional relief as the Commission finds.

Respectfully submitted,

MARTIN, PRINGLE, OLIVER,  
WALLACE & BAUER, L.L.P.

By: s/Jeff Kennedy

Jeff Kennedy, #12099  
100 North Broadway, Suite 500  
Wichita, KS 67202  
Telephone: (316) 265-9311  
Facsimile: (316) 265-2955  
[jkennedy@martinpringle.com](mailto:jkennedy@martinpringle.com)  
*Attorneys for Applicant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 20th day of March, 2019, the Request for Hearing was electronically filed and a copy e-mailed to:

Lauren N. Wright, Esq.  
Litigation Counsel  
Kansas Corporation Commission  
266 North Main, Suite 220  
Wichita, KS 67202

s/Jeff Kennedy  
Jeff Kennedy, #12099