

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners:

Shari Feist Albrecht, Chair
Jay Scott Emler
Pat Apple

In the matter of the failure of) Docket No. 15-CONS-918-CPEN
PetroSantander (USA) Inc. ("Operator"))
to report activity that occurred during the) CONSERVATION DIVISION
2014 calendar year in compliance with)
K.A.R. 82-3-409) License No.: 32198

REQUEST FOR HEARING

COMES NOW PetroSantander (USA) Inc., described as the "Operator" in the Penalty Order issued in this docket, and requests a hearing that will lead to a clarification of certain matters related to the wells identified in the Penalty Order.

1. This Penalty Order was issued with respect to the submission by Operator of U3C forms for calendar year 2014. The Penalty Order recites that such forms were not submitted.

2. Operator timely submitted U3C reports, but they were returned to Operator by the Commission because certain information in those reports was not included. A true and correct copy of the Commission's letter reflecting its request for additional information for the U3C forms is attached hereto as **Exhibit A**.

3. In fairness to the Commission staff, PetroSantander missed the deadline for submitting revised U3C forms by a few days. This failure resulted from the travel schedule of the individual responsible for submitting these forms and was not intended to reflect any non-compliance with the Commission's regulations, particularly with respect to the submission of U3C forms.

WHEREFORE, PetroSantander (USA) Inc. requests that this matter be set for hearing, request that the penalty be rescinded and for such additional and further relief as the Commission may find appropriate under the circumstances.

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

By: Jeff Kennedy
Jeff Kennedy, #12099
100 North Broadway, Suite 500
Wichita, KS 67202
Telephone: (316) 265-9311
Facsimile: (316) 265-2955
jkennedy@martinpringle.com
Attorneys for PetroSantander (USA) Inc.

VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

Jeff Kennedy of lawful age and being first duly sworn, on oath, deposes and states:

That Jeff Kennedy, counsel for PetroSantander (USA) Inc., has read the above and foregoing *Request for Hearing* and that the statements and averments contained therein are true and correct to the best of his knowledge and belief.

Jeff Kennedy
Jeff Kennedy

SUBSCRIBED AND SWORN to before me this 29th day of June, 2015.

Brenda Prieksat

Notary Public  BREND A PRIEK SAT
Notary Public - State of Kansas
My Appt. Expires 3-16-19

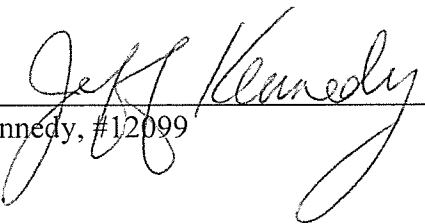
My appointment expires:

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 29th day of June, 2015, a true and correct copy of the above and foregoing *Request for Hearing* was electronically filed with the Kansas Corporation Commission and mailed via U.S. Postal Service to:

Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission
266 N. Main St., Ste. 220
Wichita, KS 67202-1513

Lane R. Palmateer
Prehearing Officer
Kansas Corporation Commission
266 N. Main St., Ste. 220
Wichita, KS 67202-1513



Jeff Kennedy, #12099

00981140.docx

Conservation Division
266 N. Main St., Ste. 220
Wichita, KS 67202-1513



Phone: 316-337-6200
Fax: 316-337-6211
<http://kcc.ks.gov/>

Shari Feist Albrecht, Chair
Jay Scott Emler, Commissioner
Pat Apple, Commissioner

Sam Brownback, Governor

May 6 2015

PetroSantander (USA) Inc 32198
6363 Woodway Drive Ste 350
Houston TX 77057

Dear Operator:

This letter is in response to the annual report of pressure monitoring and fluid injection, form U3C, filed with the Underground Injection Control (UIC) Department. Staff is unable to completely process the report as vital information was left blank or is incomplete.

Please review the reports submitted, complete all blanks and return to the UIC Department. This information is required for all enhanced recovery and disposal injection wells.

If the value for the information requested is zero, or vacuum, please indicate this by entering a zero. If operating at gravity injection pressure, you may indicate such.

A copy of the latest, July 2014, U3C fill-in form is available on line at the KCC website: www.kcc.ks.gov

As of January 1, 2011 the KCC Conservation Division will no longer accept out-dated forms, they will not be recognized as received and will be returned.

Please send a copy of this letter with the completed U3C forms within 30 days of this notice.

Information requested on the form must be provided before the form can be recorded.

Should you have any questions, please do not hesitate to contact me at 316-337-6207. Thank you for your prompt assistance in this matter.

Sincerely,

Sanita Dean
UIC Senior Adm. Asst.

Enclosure(s)

Exhibit A