

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chair
 Jay Scott Emler
 Pat Apple

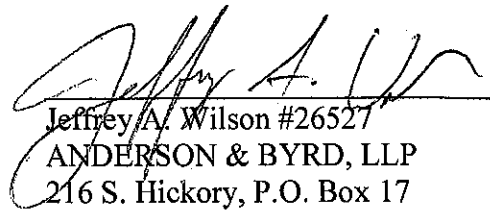
In the matter of the failure of KC Resources,)	Docket No.: 15-CONS-766-CPEN
Inc. dba Crystal River ("Operator") to comply)	
With K.A.R. 82-3-407 at the Cunningham B)	CONSERVATION DIVISION
Unit #41 and Cunningham B Unit #46 in)	
<u>Barber County, Kansas</u>)	License No.: 3880

Request for Hearing

Operator, by and through its counsel, Jeffrey A. Wilson, Anderson & Byrd, LLP, hereby moves the Kansas Corporation Commission ("KCC") for hearing in this matter. In support of its Request, Operator states:

1. Operator was told by Steve Pfeifer, a KCC employee in the field, that MIT testing on the subject wells could be delayed until the requirements of 15-CONS-465-CPEN were met. The MIT required by 15-CONS-465-CPEN will be completed today, March 23, 2015.
2. Based on the erroneous statements of said KCC employee, Operator did not complete the MIT testing by the deadline. The MIT on #46 has been completed.
3. Operator is working diligently and will have the MIT on #41 completed soon, but requests a hearing on this penalty order so that it may be reduced or vacated assuming swift completion of the MITs.

WHEREFORE, Operator prays the KCC reduce or vacate the penalty assessed in this docket because Operator's failure was in compliance with instructions given to it by KCC employees.

A handwritten signature in black ink, appearing to read "Jeffrey A. Wilson", is written over a horizontal line.

Jeffrey A. Wilson #26527

ANDERSON & BYRD, LLP

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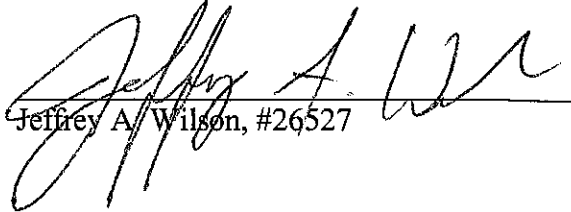
Attorneys for Applicant

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF FRANKLIN)

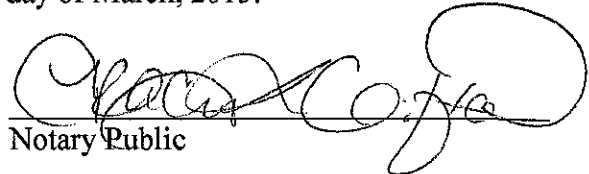
Jeffrey A. Wilson, of lawful age, being first duly sworn, upon oath states:

That he is an attorney for KC Resources, Inc. dba Crystal River, that he has read the above and foregoing Request, knows the contents thereof, knows that all the statements made therein are true, and is authorized to make this Request for the operator.


Jeffrey A. Wilson, #26527

Subscribed and sworn to before me this 23rd day of March, 2015.



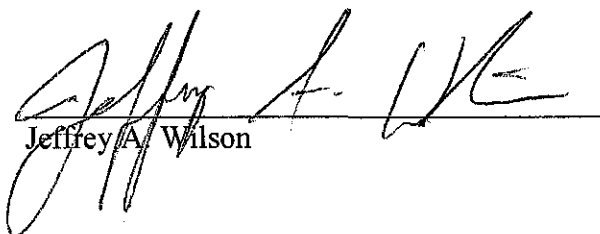

Notary Public

My appointment expires:

CERTIFICATE OF SERVICE

On this 23rd day of March, 2015, the undersigned certifies that he served a copy of the foregoing via first class mail, postage prepaid, and email as follows:

Jon Myers
KCC Litigation Counsel
266 N. Main St., Suite 220
Wichita, KS 67202
j.myers@kcc.ks.gov


Jeffrey A. Wilson