

May 24, 2019

Kansas Corporation Commission -- Conservation Division  
266 N. Main St., Ste 220  
Wichita, KS 67202

**Re: Appeal and Request for Hearing on Conservation Division Penalty Order**  
**Docket Number: 19-CONS-3360-CPEN License No.: 35488**

Attention: Lauren N. Wright, Litigation Counsel

Dear Ms. Wright:

I appeal the Penalty Order and hereby request a hearing, for the following reasons.

Micro Oil LLC is my company. I am the only member or officer of the company, which is the leaseholder for the small oil leases that are the subject of the Penalty Order. (Those are the only assets of the company, in Kansas or anywhere else.)

I obtained the leases from a small company operated by Donald Bisbee. I knew nothing about the administrative operation of an oil operation, but I did reach an agreement with Bisbee to teach me about the business while he saw to the preparation and filing of the various reports required by your corporation commission. Unfortunately for me, Bisbee did not understand that oral agreement in the same way that I did. He did not file the required reports; he has told me that he thought I would be preparing and filing any such reports.

As a consequence, I went about my very small business, thinking all was well. I now know that I was wrong. In hindsight, I now realize how and why this situation happened. During the last year (2018), Bisbee was twice admitted to the hospital for serious health issues; his wife says that one of the hospital stays resulted in surgery during a two week hospitalization, while the last hospital emergency stay was for six days. He is now still recovering from those health issues. He closed his business and has done no more work for me.

My own living circumstance made the situation worse: I live alone in a remote corner of the county, have spotty service of wi-fi (for "E MAIL"), and can only receive

important mail by going to the post office in town from time to time. Apparently I missed some of your mail, or Bisbee's hospitalizations caused him to fail to pass on mail or E MAIL to me in a timely manner.

I have now become registered with your KOLAR system, have had the missing reports completed and submitted and have a local Kansas person (who is knowledgeable about KOLAR requirements, etc.) prepared to maintain my administrative reports moving into the future. Mr. Bisbee is not involved with my business, for fulfilling KOLAR requirements, or any other business purpose. (My G-Mail account has become unusable. For the moment, I am using the account of Stefany Bisbee, with her permission. I have known her for forty years, and trust her completely.)

My very small business is an economic joke – I have no net earnings from operations. I am unable to hire more than part time help on my leases. I have no savings remaining, no cash, no bank account assets. I have no ability to pay penalties. I have had no bad intent in dealing with your corporation commission, have had no intent to avoid or ignore your requirements for my company. If you insist on penalties, I face the probability of simply abandoning those tiny leases.....**despite** being current with all required reports.

**Since I am now current** with my KOLAR reports, I ask that you forgive the penalty and allow me to continue to strive to make those leases at least break even.

Respectfully,

*R.L. Anderson*

Robert Anderson  
MICRO OIL LLC

Temporary E Mail: azsbisbee@gmail.com