

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the matter of the failure of Benjamin M. Giles
("Operator") to comply with K.A.R. 82-3-120

Docket No. 20-CONS-3082-CPEN

CONSERVATION DIVISION

License No. 5446

RESPONSE TO MOTION TO STRIKE
STATEMENT IN SUPPORT OF PETITION FOR INTERVENTION

COMES NOW, The Unsecured Creditors' Committee of MWM Oil Company Inc. of MWM Oil Company, Inc. (the "Committee"), by and through its counsel Eron Law, P.A., in response to the Commission Staff ("Staff") State Corporation Commission of the State of Kansas's (the "Commission") Motion to Strike Statement in Support of the Petition for Intervention, states as follows:

1. The Statement in Support of Petition for Intervention (the "Statement") filed by the Committee provides notice that the Unsecured Creditors are seeking intervention, based on KAR 82-1-125(a).

2. Further, the Committee satisfies all of the elements for intervention, which have been thoroughly briefed in the Statement, pursuant to KAR 82-1-125(a).

WHEREFORE, the Committee hereby reaffirms its support of the Petition for Intervention filed by Petitioners MWM Oil Company, Inc. and RAG Oil, Co., LLC and respectfully requests that the Commission deny the Staff's Motion to Strike and enter an order providing the relief requested in the Petition for Intervention.

Respectfully Submitted:

ERON LAW, P.A.
Attorneys for the
Unsecured Creditors' Committee
Of MWM Oil Company, Inc.

/s/ David Prella Eron
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**VERIFICATION OF
RESPONSE TO MOTION TO STRIKE
STATEMENT IN SUPPORT OF
PETITION FOR INTERVENTION**

I, DAVID PRELLE ERON, of lawful age, do solemnly swear, and sincerely and truly declare and affirm that:

1. I am a board certified business bankruptcy specialist, certified by the American Board of Certification.

2. I am an attorney for Unsecured Creditors' Committee of MWM Oil Company Inc. of MWM Oil Company, Inc. (the "Committee") and I am employed by the Committee, which seeks to file the foregoing Response to Motion to Strike Statement in Support of Petition For Intervention (the "Pleading").

3. I have actual knowledge of the truth of the statements made in the Pleading and have reasonable grounds to believe that the statements are true.

WHEREFORE, I hereby verify the statements and contents of the Response to Motion to Strike Statement in Support of Petition for Intervention, and I do this under the pains and penalties of perjury, so help me God.

/s/ David Prella Eron

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CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2019, a true and correct copy of the foregoing documents, were electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas.

Further, I hereby certify that on November 12, 2019, and true and correct copies of the foregoing documents TOGETHER WITH true and correct copies of the Statement in Support of Petition for Intervention were served by United States first class mail and served electronically by email to the following:

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and Nancy Borst
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*Attorney for Charlene A. Giles as Executor
of the Estate of Benjamin M. Giles*

/s/ Margaret R. Spangler
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Assistant to David Prella Eron