Aug. 12. 2013 10:26AM Andreas Law Office

David W. Andreas Attorney at Law 104½ W. 9th, Suite 303 Winfield, Kansas 67156

Ph. 620 221 1610 Fax: 620 221 1696

E-mail: dwalaw@andreaslaw.kscoxmail.com

No. 8730 P. 3 2013-08-12 11:56:47 Kansas Corporation Commission /S/ Kim Christiansen

## THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

## PROTEST

COMES NOW Southwestern College, by and through its attorney, David W. Andreas, Winfield, Kansas, and pursuant to K.S.A. 82-3-135b, submits a Protest to the Application filed herein by Apollo Energies, Inc., as follows:

- 1. Southwestern College is a Kansas educational corporation, having a business address of 100 College St., Winfield, Kansas, and is the landowner of the real estate described in the Application.
- 2. The Applicant has had ample opportunity to develop said leases, and there is no reason to believe that any additional time will further said purpose.
- 3. Protester believes the Application is simply an attempt to avoid the expenses in plugging the well or wells.

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**LEGAL SECTION** 

4. Protester reserves the right to submit additional argument and documentation in support of this protest.

WHEREFORE, Protester prays that the Application be denied without a hearing, or in the alternative be set for hearing, and upon hearing, that the Commission deny Applicant's request, and for all further proper relief.

Respectfully submitted,

David W. Andreas #10712 Attorney for Protester

## CERTIFICATE OF SERVICE

I hereby certify that on the  $12^{\rm th}$  day of August, 2013 I mailed, postage paid, a copy of the above and foregoing Protest to W. Sue Byers, 10378 North US Highway 281, Pratt, K\$ 67124 for Apollo Energies, Inc.

David W. Andreas