

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Failure of Town Oil Company,)	Docket No.15-CONS-280- CPEN
Inc. ("Operator") to Comply with K.A.R. 82-3-400 at)	License No. 6142
the Hunt #1-W, Hunt #2-W, Hunt #3-W and Hunt)	
#4-W wells in Miami County, Kansas.)	Conservation Division

REQUEST FOR A HEARING

Town Oil Company Inc. ("Town"), by and through its counsel, Keith A. Brock, Anderson & Byrd, LLP, hereby requests a hearing in the above referenced matter pursuant to K.S.A. 55-164; K.S.A. 77-537 and K.S.A. 77-542. In support of this request, Town states as follows:

1. An evidentiary hearing should be held in this matter to determine if an actual violation of K.A.R. 82-3-400 occurred or if the assessed penalty is the result of a clerical error in preparing the Annual Injection Report upon the Hunt Lease.

2. The Penalty Order issued in this Docket is unreasonable.

WHEREFORE, Town prays for an order setting the above captioned docket for hearing pursuant to K.S.A. 55-164; K.S.A. 77-537 and K.S.A. 77-542.



Keith A. Brock #24130
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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF FRANKLIN)

Keith A. Brock, of lawful age, being first duly sworn on oath, states: That he is the attorney for the Town Oil Company, Inc. named above, and is duly authorized to make this affidavit; that he has read the foregoing Request for Hearing, knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.



Keith A. Brock

SUBSCRIBED AND SWORN to before me this 5th day of November, 2014.






Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was mailed, postage prepaid, this 5th day of November, 2014, addressed to:

Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission
Conservation Division
266 N. Main Street, Suite 220
Wichita, Kansas 67202-1513



Keith A. Brock