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Kansas Corporation Commission  
/S/ Thomas A. Day

LEGAL SECTION

Date: Dec. 2, 2014

Request for Hearing and Appeal

Docket No.: 15-CONS-393-CPEN

Conservation Division

License No.: 35044

To: Thomas A. Day, Acting Executive Director

Dear Mr. Day,

Please be advised I am requesting a hearing and appealing the above named Penalty Order based on the following findings of fact:

On 3/26/2014 a Plugging Application was approved by the KCC and the well was plugged on 3/27/2014. An ACO-1 was submitted at that time with request for confidentiality checked but was returned several times because the formation tops section of the form was not completed because the tops were confidential in nature and not yet certified. An email was sent to Naomi James at that time, who did not reply that the ACO couldn't be submitted without tops.

When the submitted but unapproved ACO-1's were attempted to be retrieved from KOLAR they had apparently been deleted from the queue by the KCC. A Notice of Violation, Missing Well Completion Report (ACO-1) was received on Oct. 6, 2014 and a new ACO-1 was submitted with tops and accepted by KOLAR. This tops information was submitted with great reluctance due the huge risk and ultimately loss to discover that information

Since the tops are one of the most critically confidential features of the well data why would an operator disclose them on a form open to the public at the completion date of a wildcat well, in an area with competing oil companies for neighboring open mineral leases?

They were however disclosed immediately with associated logs and cement tickets when the notice of violation was received and confidentiality was denied as it was assumed to be back in March of that year when the ACO-1 was originally submitted.

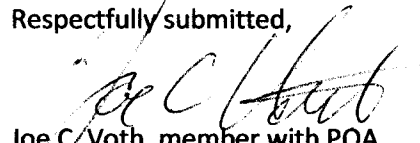
Please understand we want to comply with the laws and maintain a good relationship with the KCC. We were confused as to why we had to submit confidential tops information a well that had just been completed and could not get answers from your staff as to why.

To add to our frustration the KOLAR website is totally new to us and not at all easy to learn quickly and navigate effectively particularly when submitted documents disappear from our queue but feel more confident with it now.

To the best of our knowledge all forms and data have now been submitted to and approved by the KCC on this well and nothing remains uncompleted. If this is not correct we will forward and further requested information immediately.

We pray the Commission to understand our position on how this came about, our apology and word that it won't come to this again and dismiss the referenced Penalty Order.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joe C. Voth", written over the printed name.

Joe C. Voth, member with POA

VHR Oil, LLC.