

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

Before Commissioners: Shari Feist Albrecht, Chair
 Jay Scott Emler
 Pat Apple

In the Matter of the Application of Merit)	Docket No.: 15-CONS-843-CUNI
Energy Company, LLC, for an order)	
providing for the unitization and unit)	CONSERVATION DIVISION
operation of the Griffin Cox Chester Unit in)	
Haskell County, Kansas.)	License No.: 32446

MOTION TO ESTABLISH A HEARING SCHEDULE

Commission Staff hereby submits this Motion to Establish a Hearing Schedule in this matter. In support of the Motion, Staff respectfully states to the Commission as follows:

1. All parties attended a Prehearing Conference on June 25, 2015.
2. The parties were unable to agree on a hearing schedule.
3. The parties will be engaging in discovery, however Staff does not believe this matter is so complicated that the hearing date needs to be unduly extended.
4. Staff proposes the following schedule:
 - a. August 14, 2015: End of Discovery;
 - b. August 21, 2015: Applicant's Prefiled Testimony;
 - c. September 11, 2015: Protestant's Prefiled Testimony;
 - d. September 25, 2015: Staff's Prefiled Testimony;
 - e. October 5, 2015: Rebuttal Prefiled Testimony; and
 - f. October 15, 2015: Evidentiary Hearing
5. These timeframes should accommodate all parties. Parties can begin their discovery immediately and, if they have not already done so, retain any necessary expert witnesses.

6. Staff believes the proposed schedule allows sufficient discovery and expert witness preparation time without delaying the evidentiary hearing.

WHEREFORE, Staff requests that the Commission enter an Order adopting Staff's proposed hearing schedule.

By 
John McCannon, #8277
Litigation Counsel
Kansas Corporation Commission
266 N. Main, Suite 220
Wichita, Kansas 67202
Telephone: 316-337-6200
j.mccannon@kcc.ks.gov

CERTIFICATE OF SERVICE

I certify that on June 26, 2015, I caused a complete and accurate copy of Staff's Motion to Establish a hearing Schedule, to be served via United States mail, with the postage prepaid and properly addressed to the following:

Stanford J. Smith, Jr.
Martin, Pringle, Oliver, Wallace & Bauer, LLP
100 North Broadway, Suite 500
Wichita, Kansas 67202
Attorney for Merit Energy Company, LLC

Arlene Valliquette
Merit Energy Company, LLC
13727 Noel Road, Suite 1200
Dallas, Texas 75240

Steven D. Gough
Withers, Gough, Pike, Pfaff & Peterson, LLC
O.W. Garvey Building
200 W. Douglas, Suite 1010
Wichita, Kansas 67202
Attorney for Abercrombie Energy, LLC

Mark Galyon
Abercrombie Energy, LLC
10209 W. Central, Suite 2
Wichita, Kansas 67212

and hand-delivered to:

Jonathan R. Myers, Prehearing Officer
Jim Hemmen
KCC Central Office

/s/ Paula Murray
Paula Murray
Legal Assistant
Kansas Corporation Commission