

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

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

In the Matter of the Application of Eastern)	Docket No. 18-CONS-3141-CV AC
Kansas Operating, LLC, for Authorization)	
to Impose a Vacuum on its Fischer Lease)	CONSERVATION DIVISION
Located in Section 21, Township 16)	
South, Range 25 East, Miami County,)	License No.: 34971
Kansas.)	

OBJECTIONS TO LANDOWNER DATA REQUESTS NOS. 2 - 17

Eastern Kansas Operating, LLC (“EKO”), by and through its undersigned counsel, hereby submits the following objections to Landowner Data Requests Nos. 2 through 17. The data requests were served on EKO prior to the Prehearing Officer entering the Prehearing Officer Order Setting Procedure Schedule, Discovery Order, and Protective Order (the “Scheduling Order”). At the time the requests were served on EKO, Counsel for Protestants requested EKO’s responses by or before December 11, 2017. On December 1, 2017, the KCC entered the Scheduling Order, stating that objections shall be filed within 5 days after service. EKO hereby provides these objections within 5 days of entry of the Scheduling Order, and prior to the December 11 date originally requested by Counsel for Protestants.

EKO hereby objects to Data Requests Nos. 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13 as each of the data requests is overly broad, unduly burdensome, ambiguous, and/or not properly limited in time and scope. The requests generally seek information that is neither relevant to, nor likely to lead to discoverable information, concerning the issues material to the vacuum application. For example, Protestants seek information in requests nos. 4, 7, 8, 9, 11, 12 and 13 regarding the

price of hydrocarbons, operating expenses, capital costs, pipeline information, water disposal lines, assignments, gas quality samples, and employment history that are not relevant to the vacuum application. Further, requests nos. 5 and 6 seek information on wells that are not at issue in this docket. EKO is willing to work with Counsel for Protestants to properly identify the relevant scope and timeframe of their requests and will produce responsive documents thereafter.

Respectfully submitted,

SWANSON MIDGLEY, LLC

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was filed this 5th day of December, 2017, using the Commission's electronic filing system. Further, the undersigned hereby certifies that a copy of the forgoing was emailed this 5th day of December, 2017, to:

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/s/ Matthew L. Faul