SBEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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IN THE MATTER OF THE APPLICATION OF MERIT ENERGY COMPANY, LLC, FOR AN ORDER PROVIDING FOR THE UNITIZATION AND UNIT OPERATION OF THE GRIFFIN COX CHESTER UNIT IN HASKELL COUNTY, KANSAS.

DOCKET NO. 15-CONS-843-CUNI

OPERATOR NO. 32446 CONSERVATION DIVISION

<u>NOTICE OF SERVICE OF</u> <u>RESPONSE AND OBJECTIONS TO FIRST REQUEST</u> <u>FOR PRODUCTION OF DATA TO MERIT ENERGY COMPANY, LLC,</u> <u>BY ABERCROMBIE ENERGY, LLC</u>

COMES NOW Merit Energy Company, LLC, by and through its attorneys of record, Stanford J. Smith, Jr., of MARTIN, PRINGLE, OLIVER, WALLACE & BAUER, L.L.P., and notifies the Kansas Corporation Commission that it has served its Response and Objections to First Request for Production of Data to Merit Energy Company, LLC, by Abercrombie Energy, LLC, on this 20th day of July, 2015.

Respectfully submitted,

MARTIN, PRINGLE, OLIVER, WALLACE, & BAUER, L.L.P.

By

Stanford J. Smith, Jr., #14353 (100 North Broadway, Suite 500 Wichita, KS 67202 Telephone: (316) 265-9311 sjsmith@martinpringle.com Attorneys for Applicant

VERIFICATION

STATE OF KANSAS)) ss: COUNTY OF SEDGWICK)

Stanford J. Smith, Jr., being of lawful age and being first duly sworn upon his oath, deposes and says:

That he is the attorney for Merit Energy Company, LLC; he has read the above and foregoing Notice and is familiar with the contents and that the statements made therein are true and correct to the best of his knowledge and belief.

Stanford J. Smith, Jr.

SUBSCRIBED AND SWORN to before me this 2041 day of July, 2015.

DEBRA J. JACKSON Notary Public - State of Kansas My Appt. Expires 10 16 2010

My Appointment Expires: 10; 2011

Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was e-mailed on this 20th day of July, 2015, to:

John G. McCannon, Esq. Litigation Counsel Kansas Corporation Commission 266 North Main, Suite 220 Wichita, Kansas 67202

and a copy e- mailed to:

Steven D. Gough, Esq. WITHERS, GOUGH, PIKE, PFAFF & PETERSON, LLC 200 West Douglas, Suite 1010 Wichita, KS 67202 *Attorneys for Abercrombie Energy, LLC*

James Hemmen Kansas Corporation Commission 266 North Main, Suite 220 Wichita, Kansas 67202

Stanford J. Śmith, Jr.