

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

In the Matter of the Application of Merit)	Docket No.: 20-CONS-3062-CUNI
Energy Company, LLC, for an Order)	
Authorizing the Unitization and Unit)	CONSERVATION DIVISION
Operation of the West Eubank North Unit to)	
be located in Haskell County, Kansas.)	License No.: 32446
)	


SUPPLEMENTAL RESPONSE TO MOTION FOR SUMMARY PROCEEDINGS

Comes now the Staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission," respectively) to supplement their initial Response to Motion for Summary Proceedings filed on October 14, 2019 in regard to the Motion for Summary Proceedings filed by Merit Energy Company, LLC ("Operator"). In support of Staff's initial response, Staff supplements their original response as follows:

Staff has had the opportunity to completely review the Operator's Application in this matter. Staff is satisfied that the grant of such Application complies with the applicable statutory and regulatory requirements.

WHEREFORE, for the reasons described above, Staff recommends approval of the Operator's Application for the Unitization of the West Eubank North Unit in order to prevent waste and protect correlative rights.

Respectfully submitted,




Kelcey A. Marsh, #28300
Litigation Counsel
Kansas Corporation Commission
266 N. Main, Suite 220
Wichita, Kansas 67202-1513
Phone: 316-337-6200
Fax: 316-337-6106

VERIFICATION

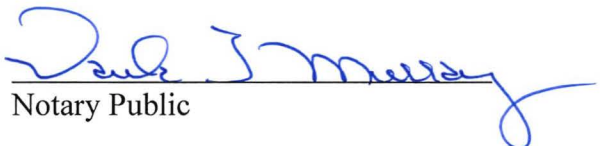
STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

Kelcey A. Marsh, of lawful age, being duly sworn upon his oath deposes and states that he is Litigation Counsel for the State Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing *Motion*, and attests that the statements therein are true to the best of his knowledge, information and belief.



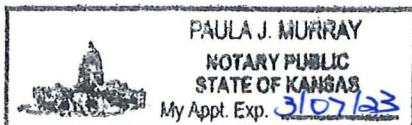
Kelcey A. Marsh, S. Ct. #28300
Litigation Counsel
State Corporation Commission
of the State of Kansas

SUBSCRIBED AND SWORN to before me this 23 day of Oct, 2019.



Notary Public

My Appointment Expires: 3/07/23



CERTIFICATE OF SERVICE

20-CONS-3062-CUNI

I, the undersigned, certify that a true copy of the attached Supplemental Response to Motion for Summary Proceedings has been served to the following by means of electronic service on October 23, 2019.

SCOTT ALBERG, DISTRICT #1 SUPERVISOR
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 1
210 E. FRONTVIEW SUITE A
DODGE CITY, KS 67801
Fax: 785-271-3354
s.alberg@kcc.ks.gov

JAKE EASTES, GEOLOGIST SPECIALIST
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
Fax: 785-271-3354
j.eastes@kcc.ks.gov

MICHAEL GLAMANN, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
Fax: 785-271-3354
m.glamann@kcc.ks.gov

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
Fax: 785-271-3354
k.marsh@kcc.ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
Fax: 316-337-6211
j.myers@kcc.ks.gov

JONATHAN A. SCHLATTER, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY CHTD
300 N MEAD STE 200
WICHITA, KS 67202-2745
Fax: 316-262-6226
jschlatter@morrislaing.com

/S/ Paula J. Murray

Paula J. Murray