

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

IN THE MATTER OF THE APPLICATION OF)	
MERIT ENERGY COMPANY, LLC, FOR AN)	DOCKET NO. 15-CONS-843-CUNI
ORDER PROVIDING FOR THE)	
UNITIZATION AND UNIT OPERATION OF)	OPERATOR NO. 32446
THE GRIFFIN COX CHESTER UNIT IN)	CONSERVATION DIVISION
HASKELL COUNTY, KANSAS.)	

REPLY OF MERIT ENERGY COMPANY, LLC, TO
THE RESPONSE OF ABERCROMBIE ENERGY, LLC, TO
STAFF'S MOTION TO ESTABLISH HEARING SCHEDULE

Merit Energy Company, LLC ("Merit"), hereby replies to the Response of Abercrombie Energy, LLC ("Abercrombie"), to Staff's Motion to Establish a Hearing Schedule. In support of this Reply, Merit states, alleges and avers as follows:

1. Despite setting forth five (5) pages of argument as to the merits of the Application, Abercrombie's argument for a delay is based on what they call an extensive request for production of data and their need to hire an expert.

2. Merit and Abercrombie have been meeting since the fall of 2014 to discuss the unitization of the Griffin Cox Chester Unit. In conjunction with those meetings, Merit provided Abercrombie extensive field data and explained the basis for the unitization proposal. Abercrombie was in no way surprised by the filing of this Application and has had the opportunity to evaluate the field and hire any needed experts during that entire time.

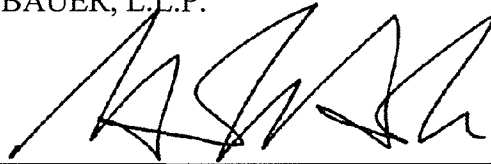
3. At the Prehearing Conference on June 23, 2015, Abercrombie made much of the same allegations and arguments and refused to compromise on a hearing schedule. Merit had originally proposed an August hearing date, but is willing to compromise and adopt the Scheduling Order proposed by the Commission in its Motion of June 26, 2015.

4. Merit will use its best efforts and attempts to try and comply with the Data Requests propounded on it by Abercrombie by the due date of July 20, 2015, and if any extension is needed to fully comply with the Request, it will only be a short one.

5. There is no reason to further delay this proceeding and Merit requests the Commission adopt the Hearing Schedule set forth in Staff's Motion.

Respectfully submitted,

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

By 

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Attorneys for Applicant

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

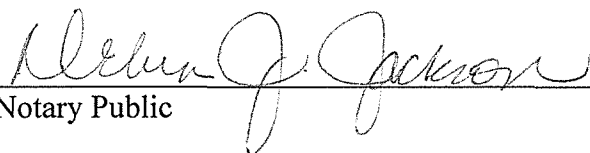
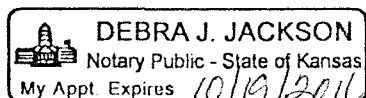
Stanford J. Smith, Jr., being of lawful age and being first duly sworn upon his oath,
deposes and says:

That he is the attorney for Merit Energy Company, LLC; he has read the above and
forgoing Reply 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 10th day of July, 2015.



Notary Public

My Appointment Expires:
10/19/2016

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was e-mailed on this 10th day of July, 2015, to:

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

Jonathan R. Myers, Esq.
Prehearing Officer
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
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Wichita, Kansas 67202

A handwritten signature in black ink, appearing to read 'Stanford J. Smith, Jr.', written over a horizontal line.

Stanford J. Smith, Jr.