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March 26, 2019

**Via U.S.P.S. Certified Mail**  
**Return Receipt Requested**  
**and Email ([Susan.W.Rose@wv.gov](mailto:Susan.W.Rose@wv.gov))**

West Virginia Oil and Gas  
Conservation Commission  
601 57<sup>th</sup> Street, SE  
Charleston, WV 25304

**Re: In the Matter of the Request by Christian E. Turak, Attorney for Robert Lee Templeton and Mary Jean Poling for a Hearing with the Oil and Gas Conservation Commission as to Antero Resources Corporation's Applicability of the Co-Tenancy Modernization and Majority Protection Act W.Va. Code 37B-1-4 (Docket No. 277, Cause No. 269)**

**Request for Continuance of Hearing Scheduled for April 24, 2019 and Request to Compel Antero Resources Corporation's Responses to Discovery Requests**

Dear Commission:

Please accept this correspondence as a formal request to continue the hearing scheduled for April 24, 2019 at 1:00p.m. in the above-referenced matter. Undersigned counsel requests that said hearing be re-scheduled no earlier than June 24, 2019.

Mr. Templeton and Ms. Poling, through counsel, request this continuance so that they may conduct limited discovery on the issues to be decided at hearing--*i.e.* whether (1) "there are seven or more royalty owners"; (2) the "operator or owner makes or has made reasonable efforts to negotiate with all royalty owners"; and (3) "royalty owners vested with at least three fourths of the right to develop, operate, and produce oil, natural gas, or their constituents consent to the lawful development of the oil or natural gas mineral property." W. Va. Code S. 37B-1-4(a). At this time, anticipated discovery will include one or more interrogatories, requests for production of documents, and one or more depositions to be scheduled at a date and time convenient to the parties.

Without the opportunity to conduct and actually obtain this discovery, any hearing on these issues would be of little value. Undersigned counsel would not have the information and documents available to make an independent determination as to the applicability of the Co-Tenancy Law to this matter and effectively advocate on behalf of Mr. Templeton and Ms. Poling at the hearing.

West Virginia Oil and Gas Conservation Commission  
March 26, 2019  
Page 2

Accordingly, please also accept this correspondence as a formal request to compel Antero Resources Corporation to provide full and complete answers and responses to the enclosed Interrogatories and Requests for Production of Documents, which is being served upon Antero Resources Corporation, through counsel.

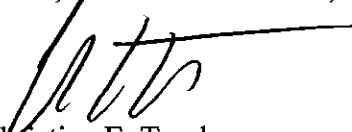
As I indicated in my previous correspondence to the Commission, undersigned counsel has requested that Antero Resources Corporation provide this information and documents on at least two separate occasions. Undersigned counsel has been advised during telephone conversations with Ms. Haley West that these documents will not be provided. Undersigned counsel requests that the Commission exercise its authority to compel Antero Resources Corporation to comply with these discovery requests

Again, please accept this correspondence as a formal request to continue the hearing scheduled for this matter and as a formal request for the Commission to exercise its authority to compel Antero Resources Corporation's full and complete responses to any valid discovery requests.

Thank you for your attention to this matter.

Sincerely yours,

GOLD, KHOUREY & TURAK, L. C.



Christian E. Turak

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Encl.

cc. Jamie Chapman