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March 28, 2017

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, Filing Room
400 North Street
Harrisburg, PA 17101

RE: Application of Laurel Pipe Line Company, L.P.; Docket No. A-2016-2575829;
**ANSWER OF MONROE ENERGY, LLC TO MOTION TO COMPEL
ANSWERS TO INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY LAUREL PIPE
LINE COMPANY, L.P., SET I**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Commission the Answer of Monroe Energy, LLC to Motion to Compel Answers to Interrogatories and Requests for Production of Documents Propounded by Laurel Pipe Line Company, L.P., Set I in the above-referenced matter. Copies of the Answer have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please contact our office.

Very truly yours,

Kevin J. McKeon
Todd S. Stewart
Whitney E. Snyder
Counsel for Monroe Energy, LLC

TSS/jld
Enclosure

cc: Administrative Law Judge Eranda Vero (via email and first class mail)
Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in the manner indicated below, and in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL

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Dated: March 28, 2017



Kevin J. McKeon
Todd S. Stewart
Whitney E. Snyder

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Laurel Pipe Line Company, L.P.	:	
For approval to change direction of petroleum	:	A-2016-2575829
products transportation service to delivery	:	
points west of Eldorado, Pennsylvania	:	
Affiliated Interest Agreement between	:	G-2017-2587567
Laurel Pipe Line Company, L.P. and	:	
Buckeye Pipe Line Company, L.P.	:	

**ANSWER OF MONROE ENERGY, LLC
TO MOTION TO COMPEL
ANSWERS TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED BY LAUREL PIPE LINE COMPANY
ON MONROE ENERGY, LLC, SET I**

TO ADMINISTRATIVE LAW JUDGE ERANDA VERO:

NOW COMES Monroe Energy, LLC (“Monroe”) and hereby answers the Motion to Compel filed by Laurel Pipe Line Company, L.P. (“Laurel” or the “Company”) upon Monroe. This Answer is made pursuant to 52 Pa. Code § 5.342(g)(1) which provides that a party against whom a motion to compel is submitted shall file an answer within five (5) days of service. In support of its Answer, Monroe states and avers as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.

4. ADMITTED. By way of further answer, on March 22, 2017, Monroe provided Answers to all Interrogatories including those to which objections were raised, but without waiving any objection. However, due to the lack of a protective order, Monroe did not provide the highly confidential material associated with those responses.

5. ADMITTED in part. It is ADMITTED that immediately prior to filing the instant Motion to Compel, counsel for Laurel Pipe Line did contact counsel for Monroe by email on the very narrow issue of resolving the Objections to the instructions to the Interrogatories. It is DENIED that counsel for Laurel ever contacted counsel for Monroe to discuss its Objections to any of the Interrogatories, or any possible resolution of the issues raised by Monroe's Objections to Laurel's Set I. This is in contradiction to the typical Pennsylvania Public Utility Commission ("Commission") practice which dictates that counsel confer on objections prior to filing a motion to compel. It is possible, that given the opportunity to confer, that some compromise could have been achieved, which would have saved all the parties the time and effort of preparing motions to compel and answers thereto, and Your Honor the time and effort of deciding the Motion. Monroe remains willing to discuss a compromise.

6. ADMITTED in part. It is ADMITTED that Laurel's Motion to Compel seeks to compel responses to its Set I, Nos. 1 through 13, but it fails to acknowledge that Monroe already has provided answers to Set I, Nos. 1 through 13.

7. ADMITTED. By way of further answer, Monroe avers that the general objections are potentially applicable to all interrogatory requests and are provided in an effort to shorten the individual objections to each interrogatory.

8. Neither ADMITTED nor DENIED. The Commission's Regulations at 52 Pa. Code § 5.342(c) speak for themselves.

9. DENIED. While these General Objections are not lodged against any particular interrogatory, rather they are lodged against all Interrogatories to which they apply, because as identified later in the Objections, many of the Interrogatories suffer the same deficiencies identified in the General Objections. The Commission's Regulations do not prohibit the lodging of General Objections.

10. ADMITTED.

11. ADMITTED in part, DENIED in part. § 5.361(a)(2) of the Commission's Regulations speaks for itself and any characterization thereof is DENIED. By way of further answer, Laurel avers that the providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection.

12. DENIED. Laurel's conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request includes time when Monroe did not even own the Trainer refinery. It is interesting that although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information for a time period when it did not own the refinery.

13. DENIED. What other parties to this proceeding have requested of Laurel has nothing to do with Laurel's request to Monroe. The fact that Gulf requested volumes back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe is reasonable. Laurel's contention is simply nonsense and it should be disregarded completely.

14. DENIED.

15. ADMITTED.

16. ADMITTED.

17. DENIED. The Commission's regulations speak for themselves and any characterization thereof is denied.

18. DENIED. The Commission's regulations speak for themselves and any characterization thereof is denied. By way of further answer, Monroe has averred that producing more than five years of data clearly goes beyond what is reasonable, presents an unreasonable burden for Monroe and would cause Monroe to perform a time-consuming analysis. Monroe has yet to present its direct testimony in this matter and when it does present evidence to support the "claims" made in its pleadings, Laurel is free to ask discovery related to it, and will undoubtedly do so. Demanding such a burdensome production before that event is unreasonable and is intended to harass and annoy Monroe. Furthermore, this oppressive and premature discovery request quite possibly could have been limited had counsel for Laurel contacted counsel for Monroe to discuss before filing the Motion to Compel, which it did not.

19. DENIED. It is clear that Monroe has yet to produce even one sentence of direct testimony. It is equally clear, that pleadings are not "evidence" and standing alone, prove nothing. The only purpose, therefore, of Laurel's unreasonable requests, is to impose a burden on Monroe as it seeks to prepare its case, something Laurel was allowed to do without the burden of responding to extremely broad, and repetitive discovery requests.

20. DENIED. To the extent that Laurel restates any part of the unfounded arguments it makes in paragraphs 11-14, those arguments are denied. § 5.361(a)(2) of the Commission's Regulations speaks for itself and any characterization thereof is DENIED. Providing a response

to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection. Laurel's conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe is reasonable. Laurel's contention is simply nonsense and it should be disregarded completely.

21. DENIED. Paragraph 21 contains a request for relief, but to the extent it makes any claim regarding Monroe's Objections, said claim is denied.

22. ADMITTED.

23. ADMITTED in part, DENIED, in part. To the extent that Laurel restates Monroe's Protest, the restatement is ADMITTED. The remainder of the paragraph is DENIED. The request seeks five years of historical sales revenue and cannot show what future injury the flow reversal will cause Monroe, which is the presumptive basis for the request in the first instance. Rather, the request clearly is intended to burden, harass and annoy Monroe. Its objection should accordingly, be sustained.

24. DENIED. The incorporation of paragraphs 11-14 is hereby DENIED as if Monroe's responses to those paragraphs were restated here. Laurel's overbroad, unreasonably burdensome, harassing and annoying requests of five years of historical billing data should be denied. § 5.361(a)(2) of the Commission's Regulations speaks for itself and any characterization thereof is DENIED. Providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection. Laurel's conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe is reasonable. Laurel's contention is simply nonsense and it should be disregarded completely.

25. DENIED. At this point, a protective order has not been negotiated and it seems unlikely that an agreement will be reached soon. Accordingly, Monroe objects to any request that seeks highly confidential material, especially given the burden of production, the competitively sensitive nature of the requested information, and Laurel's ability to obtain the same or similar information using publicly available pricing and volume data. Even after the entry of such an order, Monroe reserves the right to continue its objection.

26. DENIED.

27. ADMITTED.

28. DENIED. Monroe's Objection to Set I, No. 4 should be sustained.

29. DENIED. Monroe's responses in paragraphs 16-20 are incorporated herein as if restated here. Considering that any alleged harm is alleged to be future harm, seeking essentially all of the sales, revenue, and other data from the Trainer refinery, from before Monroe even owned it, is oppressive, beyond the scope of reasonable and should be rejected, especially given the burden of production, the competitively sensitive nature of the requested information, and Laurel's ability to obtain the same or similar information using publicly available pricing and volume data. Monroe has agreed to provide 2 years of data, but Laurel will not relent in its efforts to burden Monroe and appears to reject that compromise. Laurel's opinion of what would be reasonable has no impact on what is reasonable or burdensome to Monroe. Its suggestion that because other parties seek five years of data from it, the party with the burden of proof, it is entitled to seek such a vast amount of information from any party, simply makes no sense and must be rejected. § 5.361(a)(2) of the Commission's Regulations speaks for itself and any characterization thereof is DENIED. Providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection. Laurel's conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the

refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe is reasonable. Laurel's contention is simply nonsense and it should be disregarded completely.

30. DENIED.

31. ADMITTED.

32. DENIED. It must be noted that despite Laurel's conjecture to the contrary, Monroe may possess the data from the time it has owned and operated the Trainer Refinery, but that alone does not address the issue of reasonableness. It is Monroe's view that the amount of work required to produce the information requested is not reasonable. Countless hours are required to manipulate that data to answer the plethora of detailed requests propounded by Laurel. The entirety of the data makes each request an unreasonably burdensome part of an overly oppressive whole. § 5.361(a)(2) of the Commission's Regulations speaks for itself and any characterization thereof is DENIED. Providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection. Laurel's conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe

is reasonable. Laurel's contention is simply nonsense and it should be disregarded completely. Accordingly, Laurel's Motion must be DENIED.

33. DENIED. It is not arbitrary to state that Monroe will provide any "formal" analysis or studies, nor is it unreasonable. Rather, it is an acknowledgement that what Laurel has asked is impossible. To produce "any" or "all" documents that may mention in any manner the transport of petroleum or how the flow reversal may impact its business is not possible without limiting the scope in some manner. Monroe's reasonable approach to providing a logical framework for the production of documents should be sustained and Laurel's impossible approach, rejected.

34. ADMITTED.

35. DENIED. § 5.361(a)(2) of the Commission's Regulations speaks for itself and any characterization thereof is DENIED. Providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection. Laurel's conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe is reasonable. Laurel's contention is simply nonsense and it should be disregarded completely.

36. DENIED. It is not arbitrary to state that Monroe will provide any “formal” analysis or studies, nor is it unreasonable. Rather, it is an acknowledgement that what Laurel has asked is impossible. To produce “any” or “all” documents that may mention in any manner the transport of petroleum or how the flow reversal may impact its business is not possible without limiting the scope in some manner. Monroe’s reasonable approach to providing a logical framework for the production of documents should be sustained and Laurel’s impossible approach, rejected.

37. ADMITTED.

38. DENIED. § 5.361(a)(2) of the Commission’s Regulations speaks for itself and any characterization thereof is DENIED. Providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection. Laurel’s conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe is reasonable. Laurel’s contention is simply nonsense and it should be disregarded completely.

39. DENIED. It is not arbitrary to state that Monroe will provide any “formal” analysis or studies, nor is it unreasonable. Rather, it is an acknowledgement that what Laurel has asked is impossible. To produce “any” or “all” documents that may mention in any manner the transport

of petroleum or how the flow reversal may impact its business is not possible without limiting the scope in some manner. Monroe's reasonable approach to providing a logical framework for the production of documents should be sustained and Laurel's impossible approach, rejected.

40. ADMITTED.

41. DENIED. It is obvious, both through the request itself and the Motion to Compel, to which this response is provided, that Laurel's objective is to harass and annoy. Monroe answered request No. 8, fully and completely, in responses provided to Laurel the day before the filing of the instant Motion, and Laurel failed even to acknowledge that it had received an answer. The Motion on this point is incorrect, the affidavit does speak for itself. This demand should be rejected as moot at best.

42. ADMITTED.

43. DENIED. § 5.361(a)(2) of the Commission's Regulations speaks for itself and any characterization thereof is DENIED. Providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection. Laurel's conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that

similar request made by Laurel to Monroe is reasonable. Laurel's contention is simply nonsense and it should be disregarded completely.

44. DENIED. It is not arbitrary to state that Monroe will provide any "formal" analysis or studies, nor is it unreasonable. Rather, it is an acknowledgement that what Laurel has asked is impossible. To produce "any" or "all" documents that may mention in any manner the transport of petroleum or how the flow reversal may impact its business is not possible without limiting the scope in some manner. Monroe's reasonable approach to providing a logical framework for the production of documents should be sustained and Laurel's impossible approach, rejected.

45. ADMITTED.

46. DENIED. In the referred-to section of Monroe's Protest, Monroe suggests that fuel costs could increase by "\$34 million to \$68 million a year." As stated, it is a range. Rather than request the response as a range, as stated, Laurel misstated the request to imply that Monroe has simply stated that fuel prices could increase by \$68 million. This form of question is argumentative and misleading as it suggests something not stated by Monroe and then demands data based upon the incorrect assertion. Monroe should not be required to respond to a question, the premise of which is incorrect and contrary to what it has stated. Laurel's motion should therefore be DENIED. Monroe did answer this request without waiving its objection.

47. DENIED. § 5.361(a)(2) of the Commission's Regulations speaks for itself and any characterization thereof is DENIED. Providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection. Laurel's conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request

includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe is reasonable. Laurel’s contention is simply nonsense and it should be disregarded completely.

48. DENIED. It is not arbitrary to state that Monroe will provide any “formal” analysis or studies, nor is it unreasonable. Rather, it is an acknowledgement that what Laurel has asked is impossible. To produce “any” or “all” documents that may mention in any manner the transport of petroleum or how the flow reversal may impact its business is not possible without limiting the scope in some manner. Monroe’s reasonable approach to providing a logical framework for the production of documents should be sustained and Laurel’s impossible approach, rejected.

49. DENIED. Laurel’s Motion should be summarily DENIED.

50. ADMITTED.

51. DENIED. § 5.361(a)(2) of the Commission’s Regulations speaks for itself and any characterization thereof is DENIED. Providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection. Laurel’s conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its

request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe is reasonable. Laurel’s contention is simply nonsense and it should be disregarded completely.

52. DENIED. Monroe incorporates its responses in paragraphs 16-20, supra, as though fully stated herein. Laurel’s motion must be denied.

53. DENIED. It should be noted that Monroe answered this request, without waiving its objection thereto.

54. DENIED. It is not arbitrary to state that Monroe will provide any “formal” analysis or studies, nor is it unreasonable. Rather, it is an acknowledgement that what Laurel has asked is impossible. To produce “any” or “all” documents that may mention in any manner the transport of petroleum or how the flow reversal may impact its business is not possible without limiting the scope in some manner. Monroe’s reasonable approach to providing a logical framework for the production of documents should be sustained and Laurel’s impossible approach, rejected.

55. DENIED. Laurel’s Motion should be DENIED.

56. ADMITTED.

57. ADMITTED in part, DENIED in part. Monroe admits that it mistakenly objected to Laurel’s request on the ground that it had misquoted its protest and withdraws that part of its objection. The remainder of the basis for the objection continues to be valid.

58. DENIED. § 5.361(a)(2) of the Commission’s Regulations speaks for itself and any characterization thereof is DENIED. Providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require

an unreasonable investigation as stated in the Objection. Laurel's conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for Monroe to be required to produce five (5) plus years of records, particularly where the request includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe is reasonable. Laurel's contention is simply nonsense and it should be disregarded completely.

59. DENIED. It is not arbitrary to state that Monroe will provide any "formal" analysis or studies, nor is it unreasonable. Rather, it is an acknowledgement that what Laurel has asked is impossible. To produce "any" or "all" documents that may mention in any manner the transport of petroleum or how the flow reversal may impact its business is not possible without limiting the scope in some manner. Monroe's reasonable approach to providing a logical framework for the production of documents should be sustained and Laurel's impossible approach, rejected.

60. DENIED. By way of further answer, Monroe did provide a response to this request.

61. ADMITTED.

62. DENIED. § 5.361(a)(2) of the Commission's Regulations speaks for itself and any characterization thereof is DENIED. Providing a response to the Interrogatory in question, for the broad timeframe requested by Laurel, would impose an unreasonable burden and would require an unreasonable investigation as stated in the Objection. Laurel's conjecture of what would be reasonable for Monroe to produce notwithstanding, it would be an unreasonable burden for

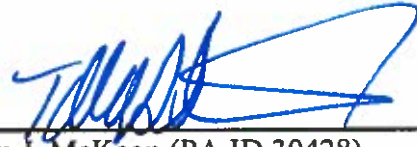
Monroe to be required to produce five (5) plus years of records, particularly where the request includes a time period when Monroe did not even own the Trainer refinery, and although Laurel makes note that Monroe did not own the Trainer refinery until February 2012, it did not adjust its request that Monroe be compelled to provide information – and continues to seek information for a time period when it did not own the refinery. The fact that Gulf requested Laurel to produce information back to 2012 and Laurel did not object to that request in no way impacts whether that similar request made by Laurel to Monroe is reasonable. Laurel’s contention is simply nonsense and it should be disregarded completely.

63. DENIED. It is not arbitrary to state that Monroe will provide any “formal” analysis or studies, nor is it unreasonable. Rather, it is an acknowledgement that what Laurel has asked is impossible. To produce “any” or “all” documents that may mention in any manner the transport of petroleum or how the flow reversal may impact its business is not possible without limiting the scope in some manner. Monroe’s reasonable approach to providing a logical framework for the production of documents should be sustained and Laurel’s impossible approach, rejected.

64. DENIED. By way of further answer, Monroe did provide an answer to this request, without waiving its objection.

WHEREFORE, Monroe Energy, LLC respectfully requests that the Motion to Compel filed by Laurel be dismissed and or DENIED in its entirety.

Respectfully submitted,



DATED: March 28, 2017

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(Pro Hac Vice Admission Application
Pending)

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