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AND AFFILIATED PARTNERSHIPS

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July 20, 2016

Via PACER/ECF and Hand Delivery

Honorable Keith L. Phillips
U.S. Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, VA 23219-1888

Re: *In re Penn Virginia Corp.*, No. 16-32395 (KLP) (Bankr. E.D. Va)

Dear Judge Phillips:

As you are aware, this firm is counsel to Penn Virginia Corporation ("Penn Virginia") and its debtor affiliates, as debtors and debtors in possession (collectively, the "Debtors") in the above-referenced chapter 11 cases (the "Chapter 11 Cases"). On behalf of the Debtors and at the Court's request at the July 19, 2016 hearing on the Motion to Compel filed by the Ad Hoc Committee of Equity Security Holders of Penn Virginia Corporation, I write to provide an indication of how much it would cost and how long it would take for the Debtors to produce emails responsive to the Ad Hoc Equity Group's pending document requests.

Since the hearing, we have worked quickly yet diligently with the representatives of the Debtors and eDiscovery vendor Equivalent Data to respond to the Court's request. The Debtors have estimated the volume of email data that would need to be collected from seven custodians and the eDiscovery vendor has used these data inputs in its estimate.

Assuming everything runs flawlessly, the estimated cost for the Debtors to produce non-privileged, responsive documents is approximately \$922,805. Given the approaching Confirmation hearing, we assumed that the document review must be completed in 10 days. It will also take a few days to get the data set up in the database, agree to and run the search terms, and prepare the non-privileged, responsive documents for production. All of this will require immense time and effort - including training and relying on more than 75 contract lawyers.

The key data assumptions that went into these estimates are as follows:

- Number of custodians: 7 (Messrs. Whitehead, Clouse, Hartman, Falbo, Udovich, Bullock and Ms. Snyder)

KIRKLAND & ELLIS LLP

Honorable Keith L. Phillips
July 20, 2016
Page 2

- Total volume of collected data via .pst files: 57 gigabytes
- Data expansion rate: 66%
- Total volume of data for search term filtering: 95 gigabytes
- Total volume of data post-filtering per review: 66 gigabytes
- Total volume of data to produce after review: 20 gigabytes
- Production costs: \$225/gigabyte
- 66 contract lawyers and 9 quality control lawyers working 10-hour days, 7-days a week at \$45/hour
- 4 team leads working 10-hour days, 7-days a week at \$65/hour
- 8 Kirkland lawyers and paralegals of various levels working on average 6 hours a day, 7-days a week at blended rate of \$740 to train, supervise and respond to questions from the contract lawyers, negotiate search terms, and perform a final review, including with respect to both relevance and privilege.

The estimate also includes fees of \$65 per user for Relativity, project management costs of \$150 per hour for 16 hours, hosting fees at \$12 per hour per gigabyte and native processing to Relativity at \$250 per gigabyte.

As discussed at the hearing, Fed. R. Civ. P. 26 requires that discovery be proportional to what is at issue in a case and not excessively burdensome or expensive as compared to the likely benefit of obtaining the discovery being sought. The Debtors submit that the cost and time burden are disproportionate to this particular case. As a useful point of comparison, the estimated amount the Debtors would incur in connection with the requested production is nearly **\$175,000 more** than the **total amount of cash** (\$750,000) that will be made available to **all** holders of general unsecured claims who elect to receive cash under the plan's convenience class (and whose overall recovery is capped at a 6.1% recovery).¹ The burden is also disproportionate

¹ Specifically, Article 3.2(g) of the Plan provides that "each holder of an Allowed Convenience Claim shall receive payment in Cash in an amount equal to \$0.061 on account of each dollar of its Allowed Convenience Claim; *provided, however*, that the total cash payments paid to holders of Allowed Convenience Claims shall not exceed an aggregate of \$750,000." The Plan defines "Convenience Claim" as

KIRKLAND & ELLIS LLP

Honorable Keith L. Phillips
July 20, 2016
Page 3

to these document requests in light of the Debtors' existing production of more than 20,000 pages and the fact that the Debtors are assisting the ad hoc committee in sorting through the documents that have already been produced to enable them to determine which ones are responsive to various requests. In that vein, I have attached the logs setting forth such information, which Debtors provided to the Ad Hoc Committee earlier today and which we will supplement as necessary. Here, the opportunity cost of using these resources in this effort is particularly steep given the other initiatives the Debtors have underway as we move to Confirmation and emergence. For these reasons, Debtors respectfully urge the Court to deny the pending Motion to Compel.

Sincerely,

A handwritten signature in black ink, appearing to read "Anna Rotman", with a stylized, flowing script.

Anna G. Rotman

Cc: Edward O. Sassower, Esq. (via Pacer/ECF)
Brian E. Schartz, Esq. (via Pacer/ECF)
Justin Bernbrock, Esq. (via Pacer/ECF)
Counsel to the Ad Hoc Equity Group (via Pacer/ECF)

Enclosure

any General Unsecured Claim, the holder of which elects to have such General Unsecured Claim treated as a Convenience Claim on its ballot on a timely basis in accordance with the Disclosure Statement Order, and which either, (i) is Allowed in an amount equal to or less than \$2,500,000 or (ii) is Allowed in an amount greater than \$2,500,000 but is reduced by such holder to \$2,500,000.

Penn Virginia Production Log

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
Documents, including emails and communications, related to Debtors' proposed transaction with TPG between July 1, 2015 and the Petition Date (Request Nos. 2, 3, 4, and 5)	PVA0010187	Board 10.28.15	7/12/16
	PVA0010221	Board 11.3.15	7/12/16
	PVA0010217	Board 11.23.15	7/12/16
	PVA0010254	Board 12.6.15	7/12/16
	PVA0010236	Board 12.15.15	7/12/16
	PVA0012234	TSSP-PVA 1st Lien Term Sheet_Executed_11.3.15	7/12/16
	PVA0010216	Board 11.23.15 Second First Lien Term Sheet	7/12/16
	PVA0012225	TPG CA fully Executed	7/12/16
	PVA0000520	11.30.15 Consolidated Financial Statements	6/24/16
	PVA0001305	12.31.15 Consolidated Financial Statements	6/24/16
Documents, including, emails and communications, related to Debtors' negotiation of the RSA between July 1, 2015 and the Petition Date (Request Nos. 4, 5, 6, 7, 8, 19, 21, 22, 23, 24)	PVA0000201	2016.05.09 - PVA - Board Minutes	6/13/16
	PVA0000181	2016.04.27 - PVA - Board Minutes	6/13/16
	PVA0009927	PVA - Barclays 06-10-10 ISDA Master Agreement & Schedule.PDF	7/2/16
	PVA0009964	PVA - Barclays Swap Confirm. (\$79.95) Under 6-10-10 ISDA Master Agreement.PDF.PDF	7/2/16
	PVA0009968	PVA - Barclays Swap Confirm. (\$90.45) Under 6-10-10 ISDA Master Agreement.PDF	7/2/16
	PVA0009972	PVA - Merrill 11-18-09 ISDA Master Agreement.pdf	7/2/16
	PVA0009987	PVA - Merrill 11-18-09 ISDA Schedule to the Master Agreement.pdf	7/2/16
	PVA0009995	PVA - Merrill Swap Confirm. Under 11-18-09 ISDA Master Agreement.PDF	7/2/16
	PVA0009998	PVA - Scotia 03-23-10 ISDA Master	7/2/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
		Agreement & Schedule.pdf	
	PVA0010025	PVA - ScotiaBank Swap Confirm. Under 3-23-10 ISDA Master Agreement.PDF.PDF	7/2/16
	PVA0010028	PVA - SocGen 12-7-12 ISDA Master Agreement & Schedule.PDF	7/2/16
	PVA0010068	PVA - SocGen Swap Confirm. Under 12-07-12 ISDA Master Agreement.PDF	7/2/16
	PVA0010073	PVA - Wells 11-18-09 ISDA Master Agreement.pdf	7/2/16
	PVA0010091	PVA - Wells 11-18-09 ISDA Schedule to the Master Agreement.PDF	7/2/16
	PVA0010101	PVA - Wells Swap Confirm. Under 11-18-09 ISDA Master Agreement.PDF	7/2/16
Documents, including emails and communications, related to (i) any default under the RBL Credit Facility, any hedging arrangement, or any obligations to Noteholders, (ii) the analysis and assertion of any claim or the exercise of any right or remedy in connection with any foregoing between July 1, 2015 and the Petition Date (Request Nos. 6, 7, 8, 19, 21, 22, 23, and 24)	PVA0010942	Tenth Amendment dates as of January 8, 2016	7/12/16
	PVA0011048	Amendment to Eleventh Amendment	7/12/16
	PVA0011251	Eleventh Amendment (Penn V)	7/12/16
	PVA0011281	Eleventh Amendment Penn Virginia Executed	7/12/16
	PVA0011311	Amendment to Eleventh Amendment (PVA) Executed	7/12/16
	PVA0011840	PVA Existing RBL Credit Agreement (Conformed as of 1-11-16)	7/12/16
	PVA0012007	PVA Existing RBL Credit Agreement (Conformed as of 1-11-16)	7/12/16
	PVA0000004	2016-02-18 - PVA - Presentation to the Board of Directors	6/13/16
	PVA0000033	2016.03.10 PVA Board Minutes	6/13/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
	PVA0000035	2016.03.12 PVA Board Minutes	6/13/16
	PVA0000037	2016.03.14 PVA Board Deck	6/13/16
	PVA0000039	2016.03.14 PVA Board Minutes	6/13/16
	PVA0000091	2016.03.23 PVA Board Minutes	6/13/16
	PVA0000157	2016.04.05 PVA Board Minutes	6/13/16
	PVA0000159	2016.04.06 PVA Board Deck	6/13/16
	PVA0000176	2016.04.06 PVA Board Minutes	6/13/16
	PVA0000197	2016.05.04 PVA Board Minutes	6/13/16
	PVA0000201	2016.05.09 PVA Board Minutes	6/13/16
	PVA0000263	2016.05.09 PVA Board Minutes	6/13/16
	PVA0000286	2016.03.04 PVA Board Deck	6/13/16
Any emails and communications between and among Debtors and any RBL Lender, any Noteholder, and/or the Indenture Trustee related to Debtors' management changes between July 1, 2015 and the Petition Date, including changes at the CEO level and the selection and appointment of a CRO (Request Nos. 8, 23, and 24)	PVA0000095	2016.03.15 PVA Board Deck	6/13/16
	PVA0000151	2016.03.23 PVA Board Minutes	6/13/16
	PVA0000350	2016.03.22 PVA Board Deck	6/13/16
Any emails and communications between Debtors and any RBL Lender, any Noteholder, and/or the Indenture Trustee related to Debtors' decision to lower the number of operating rigs and any amendments, revisions, or modifications to Debtors' future drilling and development	PVA0000001	2016.02.17 PVA Board Minutes	6/13/16
	PVA0010982	2014 Dec Prelim Budget Board Presentation - 12 17 14 FINAL 3.ppt	7/12/16
	PVA0011023	2014 Oct Forecast Board Presentation 10.22.14 FINAL.ppt	7/12/16
	PVA0011372	Exhibit IV(a) -- February 2015 BOD EF Presentations	7/12/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
plans between January 1, 2015 and the Petition Date (Request Nos. 8, 23, and 24)	PVA0010120	10.16.15 Board Presentation	7/12/16
	PVA0010139	10.28.15 Board Presentation	7/12/16
	PVA0010193	11.23.15 Board Presentation	7/12/16
	PVA0010225	12.15.15 Board Presentation	7/12/16
	PVA0010240	12.6.15 Board Presentation	7/12/16
	PVA0010339	8.21.15 Board Presentation	7/12/16
	PVA0010370	9.16.15 Board Presentation	7/12/16
	PVA0010520	PVA Management Presentation 10-12-15	7/12/16
	PVA0019045	Liberty Management Presentation February 2015	7/20/16
	PVA0010393	Liberty Managementt Presentation (8.31.15)	7/12/16
Any emails and communications between and among Debtors and any RBL Lender, any Noteholder, and/or the Indenture Trustee related to Debtors' existing and future working capital needs (Request Nos. 8, 23, and 24)	PVA0000039	2016.03.14 PVA Board Minutes	6/13/16
	PVA0000275	2016.06.09 Project Sable Board Presentation	6/13/16
	PVA0000286	2016.03.04 Board Deck	6/13/16
	PVA0010961-981	2014 Budget - Feb Board Presentation 2.13.14 FINAL.ppt	7/12/16
	PVA0010982-998	2014 Dec Prelim Budget Board Presentation - 12 17 14 FINAL 3.ppt	7/12/16
	PVA0010999-1014	2014 July Forecast Board Presentation 7 23 14 FINAL.ppt	7/12/16
	PVA0011015-1022	2014 May Forecast Board Presentation 5 4 14 FINAL.ppt	7/12/16
	PVA0011023-1036	2014 Oct Forecast Board Presentation 10.22.14 FINAL.ppt	7/12/16
	PVA0012242-	2015 Budget Board Presentation - 2	7/12/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
	264	12 15 FINAL.pptx	
	Data Room	PVA Financing Model 5-26-16	7/1/16
	PVA0000415	06.30.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0000428	05.31.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0000441	05.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000456	10_2013 O&G_OPS_FINAL.pdf	6/24/16
	PVA0000491	11.30.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0000506	11.30.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0000520	11.30.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000535	11_2013 O&G_OPS_FINAL.pdf	6/24/16
	PVA0000565	05.31.13 Consolidated Financial Statements REV Budget.pdf	6/24/16
	PVA0000578	06.30.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0000591	03.31.16 Consolidated Financial Statements.pdf	6/24/16
	PVA0000606	06.30.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000621	05_2013 O&G_OPS_FINAL.pdf	6/24/16
	PVA0000660	04.30.16 Consolidated Financial Statements.pdf	6/24/16
	PVA0000675	04.30.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000690	04.30.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0000703	12.31.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0000717	03.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000731	03.31.13 O&G OPS Consolidated_final.pdf	6/24/16
	PVA0000773	03.31.13 Consolidated Financial Statements.pdf	6/24/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
	PVA0000786	02.29.16 Consolidated Financial Statements.pdf	6/24/16
	PVA0000801	02.28.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000814	02.28.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0000827	01.31.16 Consolidated Financial Statements.pdf	6/24/16
	PVA0000842	01.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000855	04.30.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0000868	08_2013 O&G_OPS_FINAL.pdf	6/24/16
	PVA0000905	Ops_Report_9_2014.pdf	6/24/16
	PVA0000950	07.31.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0000963	07.31.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0000978	07.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000993	07_2013 O&G_OPS_DRAFT V4 BOE.pdf	6/24/16
	PVA0001030	08.31.13 Consolidated Financial Statements with FC.pdf	6/24/16
	PVA0001043	06_2013 O&G_OPS_FINAL.pdf	6/24/16
	PVA0001080	08.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0001095	Ops_Report_12_2014.pdf	6/24/16
	PVA0001143	09.30.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0001157	09.30.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0001176	09.30.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0001191	09_2013 O&G_OPS_FINAL.pdf	6/24/16
	PVA0001226	10.31.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0001228	10.31.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0001242	08.31.14 Consolidated Financial Statements.pdf	6/24/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
	PVA0001257	Ops Rpt 01_2014.pdf	6/24/16
	PVA0001290	10.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0001305	12.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0001320	12_2013 OG_OPS_FINAL.PDF	6/24/16
	PVA0001350	1Q2014 Consolidated Financial Statements.pdf	6/24/16
	PVA0001363	Ops Report_2016 _1.pdf	6/24/16
	PVA0001399	Ops Report_2016 _2.pdf	6/24/16
	PVA0001438	Ops_Report_8_2014.pdf	6/24/16
	PVA0001481	Ops Report_2016 _4.pdf	6/24/16
	PVA0001521	Ops_Report_6_2014.pdf	6/24/16
	PVA0001563	Ops Rpt 02_2014.pdf	6/24/16
	PVA0001597	Ops Rpt 03_2014.pdf	6/24/16
	PVA0001636	Ops Rpt 04_2014.pdf	6/24/16
	PVA0001676	Ops Rpt 05_2014.pdf	6/24/16
	PVA0001718	Ops_Report_10_2014.pdf	6/24/16
	PVA0001761	Ops_Report_11_2014.pdf	6/24/16
	PVA0001809	12.31.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0001824	Ops Report_2016 _3.pdf	6/24/16
Any emails and communications between and among Debtors and any RBL Lender, any Noteholder, and/or the Indenture Trustee related to the value of Debtors' assets, including, without limitation, Debtors' oil and gas reserves (Request Nos. 8, 23, and 24)	PVA0010961-981	2014 Budget - Feb Board Presentation 2.13.14 FINAL.ppt	7/12/16
	PVA0001864	Evaluation of Oil and Gas Reserves - Penn Virginia Corp.pdf	6/24/16
	PVA0002059	YE12_Reconciliation.xlsx	6/24/16
	PVA0002060	YE12_RRPT_Online.xlsx	6/24/16
	PVA0002061	MIS, Evaluation of Oil and Gas Reserves, Job 13.1543.pdf	6/24/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
	PVA0002192	YE13_Reconciliation_FINAL_Financial.xlsx	6/24/16
	PVA0002193	YE13_ReserveReport_ONELINE.xlsx	6/24/16
	PVA0002194	Management Information Supplement.pdf	6/24/16
	PVA0002305	YE14_Online_Final.xlsx	6/24/16
	PVA0002306	YE14_Reconciliation_Final.xlsx	6/24/16
	PVA0002307	022306 Penn Virginia 2015MY Report.pdf	6/24/16
	PVA0003053	022306 Penn Virginia 2015MY Total Proved Preliminary Results 09-28-2015.pdf	6/24/16
	PVA0003113	2015MY Total Proved Preliminary Onelines 09-28-2015.xlsx	6/24/16
	PVA0003114	9) Penn Virginia 2015YE Report.pdf	6/24/16
	PVA0003719	9) Penn Virginia 2015YE SEC Letter.pdf	6/24/16
	PVA0003730	MY15_Reconciliation_FINAL_Financial.xlsx	6/24/16
	PVA0003731	MY12_ARIES_Output_PROVED.pdf	6/24/16
	PVA0005158	MY12_ARIES_Output_UNPROVEN.pdf	6/24/16
	PVA0005861	MY12_Online.xlsx	6/24/16
	PVA0005862	MY12_Reconciliation_FINANCIAL.xlsx	6/24/16
	PVA0005863	MY13_ARIES_Output_PROVED.pdf	6/24/16
	PVA0007359	MY13_ARIES_Output_UNPROVEN.pdf	6/24/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
	PVA0007879	MY13_ONELINE.xlsx	6/24/16
	PVA0007880	MY13_Reconciliation_FINAL.xlsx	6/24/16
	PVA0007881	MY14_ARIES_Output_PROVED.pdf	6/24/16
	PVA0009038	MY14_ARIES_Output_UNPROVE N.pdf	6/24/16
	PVA0009905	MY14_Online.xlsx	6/24/16
	PVA0009906	MY14_Reconciliation.xlsx	6/24/16
	PVA0000409	12-4-15_Petra Well Inventory - Map.pdf	6/24/16
	PVA0009907	MARL LOCATION MAP 636 WELL COUNT.pdf	6/24/16
	PVA0009908	PROJECT EF GROSS ISOPACH UP&LO MAP.pdf	6/24/16
	PVA0009909	PROJECT EF STRUCTURE MAP.pdf	6/24/16
	PVA0009910	PROJECT LOW EF GROSS ISOPACH MAP.pdf	6/24/16
	PVA0000410	Oklahoma Gross LOS Jan-May 2016.xlsx	6/24/16
	PVA0000411	Pennsylvania Gross LOS Jan-May 2016.xlsx	6/24/16
	PVA0000412	S Texas 2014.xlsx	6/24/16
	PVA0000413	S Texas 2015.xlsx	6/24/16
	PVA0000414	S Texas 2016.xlsx	6/24/16
	PVA0000415	06.30.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0000428	05.31.14 Consolidated Financial Statements.pdf	6/24/16
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	PVA0000578	06.30.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0000591	03.31.16 Consolidated Financial Statements.pdf	6/24/16
	PVA0000606	06.301.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000621	05_2013 O&G_OPS_FINAL.pdf	6/24/16
	PVA0000660	04.30.16 Consolidated Financial Statements.pdf	6/24/16
	PVA0000675	04.30.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000690	04.30.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0000703	12.31.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0000717	03.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0000731	03.31.13 O&G OPS Consolidated_final.pdf	6/24/16
	PVA0000773	03.31.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0000786	02.29.16 Consolidated Financial Statements.pdf	6/24/16
	PVA0000801	02.28.15 Consolidated Financial Statements.pdf	6/24/16
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	PVA0000827	01.31.16 Consolidated Financial Statements.pdf	6/24/16
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	PVA0000868	08_2013 O&G_OPS_FINAL.pdf	6/24/16
	PVA0000905	Ops_Report_9_2014.pdf	6/24/16
	PVA0000950	07.31.13 Consolidated Financial Statements.pdf	6/24/16

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	PVA0000978	07.31.15 Consolidated Financial Statements.pdf	6/24/16
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	PVA0001030	08.31.13 Consolidated Financial Statements with FC.pdf	6/24/16
	PVA0001043	06_2013 O&G_OPS_FINAL.pdf	6/24/16
	PVA0001080	08.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0001095	Ops_Report_12_2014.pdf	6/24/16
	PVA0001143	09.30.13 Consolidated Financial Statements.pdf	6/24/16
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	PVA0001176	09.30.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0001191	09_2013 O&G_OPS_FINAL.pdf	6/24/16
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	PVA0001242	08.31.14 Consolidated Financial Statements.pdf	6/24/16
	PVA0001257	Ops Rpt 01_2014.pdf	6/24/16
	PVA0001290	10.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0001305	12.31.15 Consolidated Financial Statements.pdf	6/24/16
	PVA0001320	12_2013 OG_OPS_FINAL.PDF	6/24/16
	PVA0001350	1Q2014 Consolidated Financial Statements.pdf	6/24/16
	PVA0001363	Ops Report_2016 _1.pdf	6/24/16
	PVA0001399	Ops Report_2016 _2.pdf	6/24/16
	PVA0001438	Ops_Report_8_2014.pdf	6/24/16
	PVA0001481	Ops Report_2016 _4.pdf	6/24/16

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	PVA0001521	Ops_Report_6_2014.pdf	6/24/16
	PVA0001563	Ops Rpt 02_2014.pdf	6/24/16
	PVA0001597	Ops Rpt 03_2014.pdf	6/24/16
	PVA0001636	Ops Rpt 04_2014.pdf	6/24/16
	PVA0001676	Ops Rpt 05_2014.pdf	6/24/16
	PVA0001718	Ops_Report_10_2014.pdf	6/24/16
	PVA0001761	Ops_Report_11_2014.pdf	6/24/16
	PVA0001809	12.31.13 Consolidated Financial Statements.pdf	6/24/16
	PVA0001824	Ops Report_2016 _3.pdf	6/24/16
	Data Room	Reserve Report Items-selected.zip	7/1/16
	Data Room	022427 Penn Virginia 2015YE 3P Preliminary 01-28-2016.phz	7/1/16
	Data Room	022427 Penn Virginia 2015YE 3P Preliminary 01-28-2016.zip	7/1/16
	Data Room	ARIES excel 5-13 stripg- 3p.xlsx	7/1/16
	Data Room	PVA Financing Model 5-26-16.xlsx	7/1/16
	Data Room	Eagleford IP Data_2016_03_17.xls	7/1/16
	Data Room	Eagleford IP Data_2016_04_26.xls	7/1/16
	Data Room	Flowback Data.zip	7/1/16
	Data Room	Production Update.zip	7/1/16
	Data Room	Production_Update May.zip	7/1/16
	Data Room	Project Sable Capital Accrual as of 3-30-16.xlsm	7/1/16
	Data Room	Slickwater Wells 4-18-16.pdf	7/1/16
	Data Room	LOS Reports.zip	7/1/16
	Data Room	12-4-15_Petra Well Inventory Map.pdf	7/1/16
	Data Room	CO. 314 REPORT OF EXP LEASES .xlsx	7/1/16
	Data Room	Cypress Farmout Agreements-selected.zip	7/1/16
	Data Room	Land - Oklahoma.zip	7/1/16
	Data Room	REPORT FOR DEV AND NON-DEV ACREAGE CO - 314 kac 4-22-16.xlsx	7/1/16
	Data Room	REPORT FOR DEV AND NON-DEV ACREAGE CO - 300 4-22-	7/1/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
		16.xlsx	
	Data Room	REPORT FOR DEV AND NON-DEV ACREAGE CO - 318 4-22-16.xlsx	7/1/16
	Data Room	Shapefile_Update_04-22-2016.zip	7/1/16
	Data Room	10-31-08 Amended 4-18-09 Letter Agreement.pdf	7/1/16
	Data Room	10-31-08 Letter Agreement.pdf	7/1/16
	Data Room	11-21-08 Letter Agreement.pdf	7/1/16
	Data Room	2-24-10 Letter Agreement.pdf	7/1/16
	Data Room	4-18-08 Letter Agreement.pdf	7/1/16
	Data Room	4-24-10 Letter Agreement.pdf	7/1/16
	Data Room	5-26-10 Letter Agreement.pdf	7/1/16
	Data Room	7-1-08 Letter Agreement.pdf	7/1/16
	Data Room	Exploration Agreement.pdf	7/1/16
	Data Room	CHK JOAs.zip	7/1/16
	Data Room	Hunt JOAs.zip	7/1/16
	Data Room	S. Tx Op PDP (Gathered)	7/18/16
	Data Room	S. TX Op PDP Opex	7/18/16
	Data Room	S. TX Op PDP Net Prod. & Diff.	7/18/16
	Data Room	S. TX Op PDP (Core)	7/18/16
	Data Room	PVA-Republic Contract Restructuring Term Sheet	7/18/16
	Data Room	Party 1 DIP Term Sheet	7/18/16
	Data Room	Party 1 Preferred Term Sheet	7/18/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
	Data Room	Party 1 Proposal	7/18/16
	Data Room	Party 2 Proposal	7/18/16
	Data Room	Party 3 Proposal	7/18/16
	Data Room	ETC Rate Changes	7/18/16
	PVA0010258-263	Board 2.12.15	7/12/16
	PVA0011449-473	MAY 2015 BOD EF PRESENTATION 050615 FINAL.pptx	7/12/16
	Data Room	Arclight Proposal 04.28.16	7/18/16
Documents, including emails and communications, related to any claims being released pursuant to the RSA and the Plan (Request Nos. 8, 19, 21, 22, 23, and 24)	PVA0011531	Penn Virginia Corporation UCC lien summary chart April 2016	7/12/16
	PVA0011534	Penn Virginia Holding Corp. UCC lien summary chart April 2016	7/12/16
	PVA0011541	Penn Virginia MC Corporation UCC lien summary chart April 2016	7/12/16
	PVA0011544	Penn Virginia MC Energy LLC UCC lien summary chart April 2016	7/12/16
	PVA0011547	Penn Virginia MC Gathering Company LLC UCC lien summary chart April 2016	7/12/16
	PVA0011550	Penn Virginia MC Operating Company LLC UCC lien summary chart April 2016	7/12/16
	PVA0011553	Penn Virginia Oil & Gas Corporation UCC lien summary chart April 2016	7/12/16
	PVA0011609	Penn Virginia Oil & Gas LP LLC UCC lien summary chart April 2016	7/12/16
	PVA0011737	Penn Virginia Oil & Gas, L.P. UCC lien summary chart April 2016	7/12/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
	PVA0011799	Penn Virginia Resource Holdings Corp. UCC lien summary chart April 2016	7/12/16
	PVA0012198	Synergy Oil & Gas, Inc. UCC lien summary chart April 2016	7/12/16
	PVA0009927	PVA - Barclays 06-10-10 ISDA Master Agreement & Schedule.PDF	7/2/16
	PVA0009964	PVA - Barclays Swap Confirm. (\$79.95) Under 6-10-10 ISDA Master Agreement.PDF.PDF	7/2/16
	PVA0009968	PVA - Barclays Swap Confirm. (\$90.45) Under 6-10-10 ISDA Master Agreement.PDF	7/2/16
	PVA0009972	PVA - Merrill 11-18-09 ISDA Master Agreement.pdf	7/2/16
	PVA0009987	PVA - Merrill 11-18-09 ISDA Schedule to the Master Agreement.pdf	7/2/16
	PVA0009995	PVA - Merrill Swap Confirm. Under 11-18-09 ISDA Master Agreement.PDF	7/2/16
	PVA0009998	PVA - Scotia 03-23-10 ISDA Master Agreement & Schedule.pdf	7/2/16
	PVA0010025	PVA - ScotiaBank Swap Confirm. Under 3-23-10 ISDA Master Agreement.PDF.PDF	7/2/16
	PVA0010028	PVA - SocGen 12-7-12 ISDA Master Agreement & Schedule.PDF	7/2/16
	PVA0010068	PVA - SocGen Swap Confirm. Under 12-07-12 ISDA Master Agreement.PDF	7/2/16
	PVA0010073	PVA - Wells 11-18-09 ISDA Master Agreement.pdf	7/2/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
	PVA0010091	PVA - Wells 11-18-09 ISDA Schedule to the Master Agreement.PDF	7/2/16
	PVA0010101	PVA - Wells Swap Confirm. Under 11-18-09 ISDA Master Agreement.PDF	7/2/16
	Dkt. Nos. 147 and 148 (Case No. 16-32395)	Schedules and Statements	
	Dkt. Nos. 6 and 7 (Case Nos. 16-32396; 16-32397; 16-32398; 16-32399; 16-32400; 16-32401; 16-32402; 16-32403)	Schedules and Statements	
- Documents related to the internal reserve estimates referenced in Debtors' February 18, 2015 press release, including, without limitation: - the forward drilling program (number of wells and acreage to be drilled); - the drilling schedule (timing) with number of rigs and wells per year; - the working and	PVA0000412	S Texas 2014 LOS	6/24/16
	PVA0003730	MY15 Reconciliation Financial	6/24/16
	PVA0010519	PVA Consolidation Model 11.26.14	7/12/16
	PVA0010107	2015-03-13 Project Liberty Board Materials	7/12/16
	PVA0002305	YE14 Oneline Final	6/24/16
	PVA0002306	YE14 Reconciliation Final	6/24/16
	PVA0010266	Board 5.7.15 BAML Presentation	7/12/16
	PVA0007881	MY14 ARIES Output PROVED	6/24/16
	PVA0009038	MY14 ARIES Output UNPROVED	6/24/16
	PVA0019045	Liberty Management Presentation February 2015	7/20/16
	PVA0009905	MY14 Oneline	6/24/16
	PVA0009906	MY 14 Reconciliation	6/24/16
	PVA0010961	2.13.14 Budget Board Presentation	7/12/16
	PVA0010981	12.17.14 Budget Board Presentation	7/12/16
	PVA0000415	06.30.14 Consolidated Financial	6/24/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
- revenue interests in such wells; ▪ the costs assumed for such activity (drilling, stimulating, completing and tying in the wells); ▪ the timing and cost of any additional facilities needed; ▪ estimated recovery from such wells (probably based on one or more “type wells”); ▪ allocation and basis for allocation of individual wells/recovery to the different reserves categories (proved and probable, as quoted); ▪ monthly (or at least annual) forecasts of production, capital and operating costs for all reserves categories until the end of the projection period; ▪ oil and gas price differentials		Statements	
	PVA0000506	11.30.14 Consolidated Financial Statements	6/24/16
	PVA0000703	12.31.14 Consolidated Financial Statements	6/24/16
	PVA0000855	04.30.14 Consolidated Financial Statements	6/24/16
	PVA0000905	Ops Report 09.2014	6/24/16
	PVA0000963	07.31.14 Consolidated Financial Statements	6/24/16
	PVA0001095	Ops Report 12.2014	6/24/16
	PVA0000428	05.31.14 Consolidated Financial Statements	6/24/16
	PVA0001157	09.30.14 Consolidated Financial Statements	6/24/16
	PVA0001228	10.31.14 Consolidated Financial Statements	6/24/16
	PVA0001242	08.31.14 Consolidated Financial Statements	6/24/16
	PVA0001257	Ops Report 01.2014	6/24/16
	PVA0001350	1Q2014 Consolidated Financial Statements	6/24/16
	PVA0001521	Ops Report 06.2014	6/24/16
	PVA0001438	Ops Report 08.2014	6/24/16
	PVA0001563	Ops Report 02.2014	6/24/16
	PVA0001597	Ops Report 03.2014	6/24/16
	PVA0001676	Ops Report 05.2014	6/24/16
	PVA0001636	Ops Report 04.2014	6/24/16

Category of Document Requested	Bates Beg	Description of Documents	Date Produced
assumed to be applied to the prices quoted in the press release (if any) (Request Nos. 9 through 17).	PVA0001718	Ops Report 10.2014	6/24/16
	PVA0001761	Ops Report 11.2014	6/24/16
	PVA0000827	01.31.16 Consolidated Financial Statements	6/24/16
	PVA0000801	02.28.15 Consolidated Financial Statements	6/24/16

**DEBTORS' RESPONSIVE PRODUCTION
REQUEST NOS. 25–39**

Request for Production No. 25

All documents related to the Liquidation Analysis including, without limitation, all documents used in preparation of the Liquidation Analysis.

Documents Produced

1. PVA Financing Model 5-26-16. The Company utilized all of the documents provided to the AD HOC COMMITTEE OF EQUITY SECURITY HOLDERS in the DealCloud data room to determine the operational, engineering, geologic and other business assumptions, which are included in the financial projections. The financial model incorporates operating cost and production assumptions associated with the Company's developed and undeveloped properties, a plan of development, hedges, midstream, and net working capital forecast. A comprehensive list of these documents is provided below:
 - a. Company Reserve Report Inputs
 - i. LOE GPT recap 1.18.16
 - ii. 12-4-15_Petra Well Inventory
 - iii. Petra_Well Inventory_12-11-2015
 - iv. Eagle Ford Gas Shrink and NGL Yield Data_2015_12_11
 - b. Documents related to Contracts
 - i. PVA-Republic_Contract_Restructuring_Term_Sheet_(PVA_6-25)
 - ii. ETC Rate Changes
 - iii. S. TX Op PDP Opex
 - iv. S.TX Op PDP (Gathered)
 - v. S. TX Op PDP (Core)
 - vi. S. TX Op PDP Net Prod. & Diff.
 - c. Production Data
 - i. Eagleford IP Data_2016_03_17
 - ii. Eagleford IP Data_2016_04_26
 - iii. Flowback Data.zip
 - iv. Production Update.zip
 - v. Production_Update May.zip
 - vi. Project Sable - Capital Accrual as of 3-30-16
 - vii. Slickwater Wells 4-18-16
 - d. LOS Reports
 - i. LOS Reports.zip
 1. Oklahoma Non op by Property.xlsx
 2. Oklahoma Non op Total.xlsx
 3. Oklahoma Operated by Property.xlsx
 4. Oklahoma Operated Total.xlsx
 5. PA Operated by Property.xlsx
 6. PA Operated Total.xlsx

7. South Texas Non op by Property.xlsx
8. South Texas Non op Total.xlsx
9. South Texas Operated by Property.xlsx
10. South Texas Operated Total.xlsx
- ii. 12-4-15_Petra Well Inventory – Map
- iii. CO. 314 Report OF EXP LEASES
- iv. Cypress Farmout Agreements-selected.zip
- v. Land – Oklahoma.zip
- vi. REPORT FOR DEV AND NON-DEV ACREAGE - CO 314 kac 4-22-16
- vii. REPORT FOR DEV AND NON-DEV ACREAGE - CO 300 4-22-16
- viii. REPORT FOR DEV AND NON-DEV ACREAGE - CO 318 4-22-16
- ix. Shapefile_Update_04-22-2016.zip
- e. JOAs
 - i. CHK JOAs.zip
 - ii. Hunt JOAs.zip
- f. DeGolyer and MacNaughton year-end 2015 Reserve Report

Request for Production No. 26

All documents related to Debtors' unaudited pro forma consolidated and nonconsolidated financial statements dated as of August 31, 2016, including, without limitation, the financial statements referenced in the Disclosure Statement.

Documents Produced

1. PVA Financing Model 5-26-16

Request for Production No. 27

All documents related to the Financial Projections, including without limitation the Financial Projections in Excel format, all documents used to prepare the Financial Projections, all supporting information and assumptions used to create the Financial Projections, and all communications concerning the preparation of the Financial Projections.

Documents Produced

1. PVA Financing Model 5-26-16

Request for Production No. 28

All documents related to the forecasted projection estimates of Debtors' oil and gas reserves referenced in the Financial Projections.

Documents Produced

1. PVA Financing Model 5-26-16

2. Reserve Report Items-selected.zip
 - a. LOE GPT recap 1.18.16
 - b. 12-4-15_Petra Well Inventory
 - c. Petra_Well Inventory_12-11-2015
 - d. Eagle Ford Gas Shrink and NGL Yield Data_2015_12_11
 - e. Penn Virginia 2015YE Report
 - f. Penn Virginia 2015YE SEC Letter
3. 022427 Penn Virginia 2015YE 3P Preliminary 01-28-2016
4. ARIES excel 5-13 strip - 3p

Request for Production No. 29

All documents related to Debtors' estimated commodity pricing referenced in the Financial Projections.

Documents Produced

1. PVA Financing Model 5-26-16

Request for Production No. 30

All documents related to Debtors' estimated future incurred operating, capital expenditure and overhead costs referenced in the Financial Projections.

Documents Produced

1. PVA Financing Model 5-26-16

Request for Production No. 31

All documents related to decline curves used by management for the Projection Period referenced in the Financial Projections.

Documents Produced

1. PVA Financing Model 5-26-16
2. Flowback Data
3. Eagleford IP Data_2016_03_17
4. Eagleford IP Data_2016_04_26
5. Production Update
6. Production_Update May
7. Slickwater Wells 4-18-16

Request for Production No. 32

All documents related to the wells scheduled to be drilled and completed during the Projection Period referenced in the Financial Projections.

Documents Produced

1. PVA Financing Model 5-26-16
2. 12-4-15_Petra Well Inventory – Map

Request for Production No. 33

All documents related to commodity pricing based on NYMEX strip pricing for crude oil and natural gas as of May 13, 2016 referenced in the Financial Projections.

Documents Produced

1. PVA Financing Model 5-26-16

Request for Production No. 34

All documents related to operating expenses based on historical realized costs referenced in the Financial Projections.

Documents Produced

1. PVA Financing Model 5-26-16
2. LOS Reports:
 - a. LOS Reports.zip
 - i. Oklahoma Non op by Property.xlsx
 - ii. Oklahoma Non op Total.xlsx
 - iii. Oklahoma Operated by Property.xlsx
 - iv. Oklahoma Operated Total.xlsx
 - v. PA Operated by Property.xlsx
 - vi. PA Operated Total.xlsx
 - vii. South Texas Non op by Property.xlsx
 - viii. South Texas Non op Total.xlsx
 - ix. South Texas Operated by Property.xlsx
 - x. South Texas Operated Total.xlsx

Request for Production No. 35

All documents related to the preparation of the Valuation Analysis, including all management projections, communications, and all prior drafts.

Documents Produced

1. PVA Financing Model 5-26-16
2. Company Reserve Report Inputs
 - a. LOE GPT recap 1.18.16
 - b. 12-4-15_Petra Well Inventory
 - c. Petra_Well Inventory_12-11-2015
 - d. Eagle Ford Gas Shrink and NGL Yield Data_2015_12_11
3. Documents related to Contracts
 - a. PVA-Republic_Contract_Restructuring_Term_Sheet_(PVA_6-25)
 - b. ETC Rate Changes
 - c. S. TX Op PDP Opex
 - d. S.TX Op PDP (Gathered)
 - e. S. TX Op PDP (Core)
 - f. S. TX Op PDP Net Prod. & Diff.
4. Production Data
 - a. Eagleford IP Data_2016_03_17
 - b. Eagleford IP Data_2016_04_26
 - c. Flowback Data.zip
 - d. Production Update.zip
 - e. Production_Update May.zip
 - f. Project Sable - Capital Accrual as of 3-30-16
 - g. Slickwater Wells 4-18-16
5. LOS Reports
 - a. LOS Reports.zip
 - i. Oklahoma Non op by Property.xlsx
 - ii. Oklahoma Non op Total.xlsx
 - iii. Oklahoma Operated by Property.xlsx
 - iv. Oklahoma Operated Total.xlsx
 - v. PA Operated by Property.xlsx
 - vi. PA Operated Total.xlsx
 - vii. South Texas Non op by Property.xlsx
 - viii. South Texas Non op Total.xlsx
 - ix. South Texas Operated by Property.xlsx
 - x. South Texas Operated Total.xlsx
 - b. 12-4-15_Petra Well Inventory – Map
 - c. CO. 314 Report OF EXP LEASES
 - d. Cypress Farmout Agreements-selected.zip
 - e. Land – Oklahoma.zip
 - f. REPORT FOR DEV AND NON-DEV ACREAGE - CO 314 kac 4-22-16
 - g. REPORT FOR DEV AND NON-DEV ACREAGE - CO 300 4-22-16
 - h. REPORT FOR DEV AND NON-DEV ACREAGE - CO 318 4-22-16

- i. Shapefile_Update_04-22-2016.zip
- 6. JOAs
 - a. CHK JOAs.zip
 - b. Hunt JOAs.zip
- 7. DeGolyer and MacNaughton year-end 2015 Reserve Report
- 8. Third Party Indications of Interest
 - a. Arclight Proposal
 - b. Party 1 Proposal
 - c. Party 2 Proposal
 - d. Party 3 Proposal
- 9. Corporate filings (including investor presentations and press releases) for comparable companies
 - a. Bill Barrett Corporation
 - b. Contango Oil & Gas Company
 - c. Earthstone Energy
 - d. Jones Energy
 - e. Lonestar Resources
 - f. Sanchez Energy Corporation
- 10. Capital IQ
 - a. Market data, trading and operating metrics for comparable companies
- 11. Bloomberg
 - a. Market data, commodity trading prices

Request for Production No. 36

All of Debtors' historical financial information used to prepare the Valuation Analysis.

Documents Produced

- 1. PVA Financing Model 5-26-16
- 2. LOS Reports
 - a. LOS Reports.zip
 - i. Oklahoma Non op by Property.xlsx
 - ii. Oklahoma Non op Total.xlsx
 - iii. Oklahoma Operated by Property.xlsx
 - iv. Oklahoma Operated Total.xlsx
 - v. PA Operated by Property.xlsx
 - vi. PA Operated Total.xlsx
 - vii. South Texas Non op by Property.xlsx
 - viii. South Texas Non op Total.xlsx
 - ix. South Texas Operated by Property.xlsx
 - x. South Texas Operated Total.xlsx

Request for Production No. 37

All of Debtors' internal financial and operating data used to prepare the Valuation Analysis.

Documents Produced

1. PVA Financing Model 5-26-16
2. LOS Reports
 - a. LOS Reports.zip
 - i. Oklahoma Non op by Property.xlsx
 - ii. Oklahoma Non op Total.xlsx
 - iii. Oklahoma Operated by Property.xlsx
 - iv. Oklahoma Operated Total.xlsx
 - v. PA Operated by Property.xlsx
 - vi. PA Operated Total.xlsx
 - vii. South Texas Non op by Property.xlsx
 - viii. South Texas Non op Total.xlsx
 - ix. South Texas Operated by Property.xlsx
 - x. South Texas Operated Total.xlsx

Request for Production No. 38

All documents related to the calculation of Net Asset Value referenced in the Valuation Analysis, including, without limitation, all documents used in preparation of the Valuation Analysis.

Documents Produced

1. PVA Financing Model 5-26-16
2. Company Reserve Report Inputs
 - a. LOE GPT recap 1.18.16
 - b. 12-4-15_Petra Well Inventory
 - c. Petra_Well Inventory_12-11-2015
 - d. Eagle Ford Gas Shrink and NGL Yield Data_2015_12_11
3. Documents related to Contracts
 - a. PVA-Republic_Contract_Restructuring_Term_Sheet_(PVA_6-25)
 - b. ETC Rate Changes
 - c. S. TX Op PDP Opex
 - d. S.TX Op PDP (Gathered)
 - e. S. TX Op PDP (Core)
 - f. S. TX Op PDP Net Prod. & Diff.
4. Production Data
 - a. Eagleford IP Data_2016_03_17
 - b. Eagleford IP Data_2016_04_26
 - c. Flowback Data.zip

- d. Production Update.zip
- e. Production_Update May.zip
- f. Project Sable - Capital Accrual as of 3-30-16
- g. Slickwater Wells 4-18-16
- 5. LOS Reports
 - a. LOS Reports.zip
 - i. Oklahoma Non op by Property.xlsx
 - ii. Oklahoma Non op Total.xlsx
 - iii. Oklahoma Operated by Property.xlsx
 - iv. Oklahoma Operated Total.xlsx
 - v. PA Operated by Property.xlsx
 - vi. PA Operated Total.xlsx
 - vii. South Texas Non op by Property.xlsx
 - viii. South Texas Non op Total.xlsx
 - ix. South Texas Operated by Property.xlsx
 - x. South Texas Operated Total.xlsx
 - b. 12-4-15_Petra Well Inventory – Map
 - c. CO. 314 Report OF EXP LEASES
 - d. Cypress Farmout Agreements-selected.zip
 - e. Land – Oklahoma.zip
 - f. REPORT FOR DEV AND NON-DEV ACREAGE - CO 314 kac 4-22-16
 - g. REPORT FOR DEV AND NON-DEV ACREAGE - CO 300 4-22-16
 - h. REPORT FOR DEV AND NON-DEV ACREAGE - CO 318 4-22-16
 - i. Shapefile_Update_04-22-2016.zip
- 6. JOAs
 - a. CHK JOAs.zip
 - b. Hunt JOAs.zip
- 7. DeGolyer and MacNaughton year-end 2015 Reserve Report
- 8. Third Party Indications of Interest
 - a. Arclight Proposal
 - b. Party 1 Proposal
 - c. Party 2 Proposal
 - d. Party 3 Proposal
- 9. June 2016 Society of Petroleum Evaluation Engineers (“SPEE”) 35th Annual Survey of Parameters Used in Property Evaluation
 - a. Valuation Methodologies and Criteria
 - b. Reserve Adjustment Factors

Request for Production No. 39

All documents related to the comparable company analysis referenced in the Valuation Analysis, including, without limitation, all documents used in preparation of the Valuation Analysis.

Documents Produced

1. Corporate filings (including investor presentations and press releases) for comparable companies
 - a. Bill Barrett Corporation
 - b. Contango Oil & Gas Company
 - c. Earthstone Energy
 - d. Jones Energy
 - e. Lonestar Resources
 - f. Sanchez Energy Corporation
2. Capital IQ
 - a. Market data, trading and operating metrics for comparable companies
3. Bloomberg
 - a. Market data, commodity trading prices