



October 15, 2012

VIA ELECTRONIC FILING & U.S. MAIL

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Petition of Anadarko E&P Company LP for Amendment and Clarification
Docket No. M-2012-2288561

Dear Secretary Chiavetta:

Enclosed please find Seneca Resources Corporation's *Answer in Support of the Petition of Anadarko E&P Company LP for Amendment and Clarification* filed in the above-referenced matter.

Very truly yours,

A handwritten signature in blue ink that reads "Christopher M. Trejchel".

Christopher M. Trejchel
Assistant General Counsel

Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Act 13 of 2012 – Implementation of	:	Answer to Petition
Unconventional Gas Well Impact Fee	:	
	:	Docket No. M-2012-2288561

**ANSWER OF SENECA RESOURCES CORPORATION
IN SUPPORT OF
PETITION OF ANADARKO E&P COMPANY LP
FOR AMENDMENT AND CLARIFICATION**

AND NOW, comes Seneca Resources Corporation (Seneca), by and through its counsel, Christopher M. Trejchel, Esq., and submits this Answer in support of the Petition of Anadarko E&P Company LP (Anadarko) for amendment and clarification regarding the implementation of Act 13 of 2012 and in support thereof states the following.

On February 14, 2012, Act 13 of 2012 was signed into law, amending Title 58 (Oil & Gas) of the Pennsylvania Consolidated Statutes, and allowing for an impact fee to be imposed on unconventional gas well producers. The Pennsylvania Public Utility Commission (Commission) was given the responsibility for administering and implementing the impact fee provisions of Act 13 of 2012. The Commission proceeded to issue a Tentative Implementation Order on March 15, 2012, an Implementation Order Regarding Chapter 23 on May 10, 2012, a Reconsideration Order on June 7, 2012, and a Reconsideration Order Regarding Chapter 23 on July 19, 2012. After paying its initial impact fees, Anadarko filed a Petition for Clarification and Amendment on October 1, 2012.

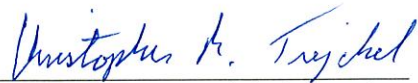
Seneca is a producer of natural gas from unconventional well formations in the Commonwealth of Pennsylvania. As a producer of gas from unconventional well formations,

Seneca is subject to the impact fee requirements of Act 13 of 2012, and pursuant to those requirements timely paid its required fees in September 2012 to the Commission. Because Seneca's operations in the Commonwealth are subject to the fee requirements of Act 13 of 2012, Seneca has an interest in the matters raised by Anadarko in its Petition.

The Commission's review of the issues raised by Anadarko in its Petition is appropriate to provide certainty regarding the application of impact fees under Act 13 of 2012. Seneca agrees with Anadarko's requests (and arguments in support thereof) that the Commission: clarify that setting a conductor pipe is not spudding a well; provide a mechanism for reclassifying wells from horizontal to vertical wells; clarify that fees are not payable for the year in which a well is plugged; and clarify its procedures regarding fee disputes and refunds.

WHEREFORE, Seneca respectfully requests that the Commission grant the relief requested by Anadarko in its Petition.

Respectfully submitted,


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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Act 13 of 2012 – Implementation of	:	Proof of Service
Unconventional Gas Well Impact Fee	:	
	:	Docket No. M-2012-2288561

I hereby certify that this day I served a true copy of the foregoing document on the persons listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: October 15, 2012



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