

March 18, 2013

Secretary Pennsylvania Public Utility Commission 400 North Street Harrisburg, PA 17120

Re: Docket No. A-2012-2293755; Notice of Withdrawal of

Pipeline Operator Registration; Pennsylvania Land Holdings Company, LLC

Dear Secretary:

On or about March 16, 2012, Pennsylvania Land Holdings Company, LLC ("PLHC") filed an initial pipeline operator registration form and the applicable registration fee with the Pennsylvania Public Utility Commission ("Pa PUC") in good faith compliance with the Gas and Hazardous Liquids Pipelines Act (Act 127 of 2011) and the Final Implementation Order issued by the Pa PUC on February 17, 2012. In the cover letter accompanying that registration, PLHC explained that the registration form was filed out of an abundance of caution and not because PLHC believed that it was truly in the business of operating natural gas pipelines. (A copy of that March 16, 2012 cover letter is enclosed.)

PLHC's March 16, 2012 letter explained that PLHC is primarily a holding company for coal and coal-related real property assets for certain Pennsylvania coal mining affiliates of Alpha Natural Resources, Inc. As a part of this function, PLHC acquires and holds some natural gas assets located within the mine plans of these affiliated coal mines, which assets include natural gas wells and the associated pipelines. PLHC acquired these assets with the intention of transferring the gas wells to its coal mining affiliates so that they can plug and abandon the wells in advance of coal mining. This practice allows the coal mines to mine through (rather than mine around) the location of the well bores, thereby increasing the mine's efficiency and productivity.

As of March 16, 2012, the date of the initial registration, PLHC owned 15.3 miles of Class 1 pipeline with 24 "farm taps" in Greene County, Pennsylvania. Subsequent to the date of PLHC's registration, PLHC removed all of these "farm taps" from the Class 1 pipeline that it owns. PLHC believes that the removal of these "farm taps" from its Class 1 pipeline takes PLHC out of the definition of "pipeline operator" under Act 127 of 2011. Therefore, PLHC will not be filing a pipeline operator registration form with the Pa PUC for 2013.

In addition, PLHC seeks to de-register as a "pipeline operator." PLHC's March 16, 2012 letter placed the Pa PUC on notice that PLHC reserved its privilege or right to de-register upon completion of taking the "farm taps" off of its Class 1 pipeline. PLHC desires to exercise this privilege or right at this time.

Secretary, Pennsylvania Public Utility Commission March 18, 2013 Page 2 of 2

If there are any questions regarding the information contained in this notice letter, or if you need more information, please feel free to contact me at 724-627-4511.

Sincerely,

James Cappucci

Pennsylvania Land Holdings Company, LLC

Enclosures: (1) Initial Pipeline Operator Registration Form; and (2) Cover Letter

Pennsylvania Public Utility Commission Secretary's Bureau Harrisburg, PA 17105-3265 eFile: http://www.puc.state.pa.us/efiling/default.aspx Total Class 2, 3 & 4 PA miles: 0.0

Total Hazardous Lines PA miles: 0.0

Initial Registration – Calendar Year 2011

Questions: 717-772-7777 (Secretary)

### Pennsylvania Pipeline Operator Annual Registration Form

1. Appli	cant (Registran	t) Name: Pe	nnsylvar	nia L	and H	oldings	Company, LLC	
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4. Physic	cal Address:	158 Porta					_	
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5. ŲS DC	T/PHMSA Oper	ator ID Numb	эег ( <i>if availa</i>	able):				
6. PAL&	l Propane Regis	stration Numi	ber ( <i>if app‼</i>	cabie	):- <u></u>	2		
7. Regula	atory Contact In	formation:						
Name:	Joanne Reil	ly			Email	Address:	jreilly@alphanr.com	
Address:	158 Portal Re	oad			Telep	hone No.:	724-852-5732	ext:
Address 2	: <u>P.O. Box 10</u>	20						
City:	Waynesburg		State: PA	<u></u>	Zip Co	de: <u>1537(</u>	)	
8. Asses	sment Contact I	Information:						
Name:	Joanne Reill	У			Email	Address:	jreilly@alpanr.com	
Address:	158 Portal R				Telepi	hone No.:	724-852-5732	ext:
	P.O. Box 10				,			
City:	Waynesburg		State: PA		Zip Cod	de: 15370	)	

### Pennsylvania Pipeline Operator Annual Registration Form

Applicant	(Registrant) Name: <u>Pennsylvania</u>	and Holdings Company, LLC
9. Feder	al EIN Number: <u>84-1452626</u>	_
10. Pipeii	ne Emergency (PEMA) Contact Information	:
Name:	Rickey Bissett	Email Address: rbissett@alphanr.com
Address:	158 Portal Road	Telephone No.: <u>724-852-5994</u> ext:
Address 2	P.O. Box 1020	_
City:	Wavnesburg State: PA	Zip Code: <u>15370</u>
11. Attorn	ey (if applicable):	
Name:	Richard T. Miller	Email Address: rtmiller@alphanr.com
Address:	999 Corporate Blvd, Suite 300	Telephone No.: 410-689-7517 ext:
Address 2		_
City:	Linthicum Heights State: MD	Zlp Code: 21090
<ul> <li>List on Decempennsy</li> <li>For each the priod County</li> <li>For each 31 of the Pipeline</li> <li>The conforthe attached</li> </ul>	ther 31 of the prior year for all Class 2, 3, and a vivania hazardous liquids pipelines. The Pennsylvania natural gas pipeline, provide to ryear by class and by county as indicated in the Location and Mileage."  The Pennsylvania hazardous liquids pipeline, price prior year by type and county as indicated in the County Location and Mileage."	the total in-state pipeline mileage in operation as of a Pennsylvania natural gas pipelines and all the in-state mileage in operation as of December 31 of the attached table entitled "Natural Gas Pipeline ovide the In-state mileage in operation as of December in the attached table entitled "Hazardous Liquids cts Installed in the prior calendar year in Pennsylvania ural gas or hazardous liquids as indicated in the
	emptions: Propane Distributor registered	
14. Verifica	ation of Application. I hereby state that the sto the best of my/our knowledge and belief. Tare made subject to the penalties of 18 Pa. C.	tatements made in this application are true and he undersigned understands that false statements S. Section 4904 Relating to Unsworn Falsification to
Richard Print Nam		Signature Signature
<u>Vice Pres</u> Title	ident and Assistant General Counsel	March 15, 2012

## Attachment A

# Hazardous Liquids Pipeline County Location and Mileage

	Description of	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	011						
Pipeline Operator.	Pipeline Operator: Pennsylvania Land Moidings Company, LLC	and Holdings Col	mpany, LLC						
Calendar Year.									
	Intra	Intrastate	Interstate	state		Intra	Intrastate	Interstate	state
County	Non-HCA	HCA	Non-HCA	HCA	County	Non-HCA	HCA	Non-HCA	AZH.
1. Adams					35. Lackawanna				
2. Allegheny					36. Lancaster				
3. Armstrong					37. Lawrence				
4. Beaver					38. Lebanon				
5. Bedford					39. Lehigh				
6. Berks					40. Luzeme				
7. Blair					41. Lycoming				
8. Bradford					42. McKean				
9. Bucks					43. Mercer				
10. Butler			l l		44. Mifflin				
11. Cambria					45. Monroe				
12. Cameron					46. Montgomery				
13. Carbon					47. Montour				
14. Centre					48. Northampton				
15. Chester					49. Northumberland				
16. Clarion					50. Perry				
17. Clearfield					51. Philadelphia				
18. Clinton					52. Pike				
19. Columbia					53. Potter				
20. Crawford					54. Schuylkill	234			
21. Cumberland					55. Snyder				
22. Dauphin					58. Somerset				
23. Delaware					57. Sulfivan				
24. Elk					58. Susquehanna				
25. Erie		. 21			59. Tioga				
26. Fayette		2500			60. Union				
27. Forest					81. Venango				
28. Franklin					62. Warren				
28. Fulton					63. Washington				
30. Greene					84. Wayne				
31. Huntingdon					85. Westmoreland				
32, Indiana					96. Wyoming				
33. Jefferson					67. York				
34. Juniata			383		Totals:	0.0	0.0	0.0	0.0

Please report mileage to the nearest 1/10th of a mile

## Natural Gas Pipeline County Location and Mileage

Calendar Year.					1					100000					
		# of Farm	Class 1	1	1					# of Farm	Class 1				
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3. Armstrong							00	37. Lawrence							9
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5. Bedford							0.0	39. Lehigh							69
6. Bertis							00	40. Luzете					-		00
7. Blair		-		1			00	41. Lycoming							88
B. Bradford				1			00	42, McKean							00
9. Bucks							0.0	43. Mercer							0,0
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15. Chester							00	46. Northumberland							αo
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21. Cumberland							0.0	55. Snyder							0.0
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23. Dulaware							0.0	57. Sullivan		1		and.			0.0
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30, Greene	15.3	34	0.0	0.0	9	0.0	0.60	84. Wayne							0.0
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Please report mileage to the nearest 1/10th of a mile



March 16, 2012

Secretary Pennsylvania Public Utility Commission 400 North Street Harrisburg, PA 17120

Re:

Pennsylvania Pipeline Operator Registration Form for

Pennsylvania Land Holdings Company, LLC

Dear Secretary:

In compliance with the Gas and Hazardous Liquids Pipelines Act (Act 127 of 2011) and the Final Implementation Order issued by the Pennsylvania Public Utility Commission ("Pa PUC") on February 17, 2012, this company, Pennsylvania Land Holdings Company, LLC ("PLHC"), hereby submits its initial pipeline operator registration form and the applicable Two Hundred Fifty Dollar (\$250.00) registration fee.

PLHC is primarily a holding company for coal and coal-related real property assets for certain Pennsylvania coal mining affiliates of Alpha Natural Resources, Inc. As a part of this function, PLHC acquires and holds some natural gas assets located within the mine plans of these affiliated coal mines, which assets include natural gas wells and the associated pipelines. PLHC acquired these assets with the intention of transferring the gas wells to its coal mining affiliates so that they can plug and abandon the wells in advance of coal mining. Otherwise, the coal mines likely would be required to mine around these gas wells, which would result in the sterilization of valuable coal reserves and the slow-down or interruption of coal production. While PLHC generally believes it is not a "pipeline operator" subject to the Pa PUC's jurisdiction, PLHC does own pipeline facilities in Class 1 locations that, at least on a temporary basis, may be considered "farm taps." Therefore, PLHC has undertaken a good faith effort to determine whether it must comply with the registration requirement under Act 127 and has decided to file a registration form out of an abundance of caution.

In this regard, PLHC hereby notifies the Pa PUC that, as part of its affiliated coal mining operations and pursuant to agreements in place with land owners along the pipeline, <u>PLHC will be taking these potential farm taps out of service on or before July 1, 2012</u>. In the interim and, again, out of an abundance of caution, PLHC attaches the necessary registration form and attachment to ensure compliance. That being said, PLHC reserves the right to de-register when these facilities are taken out of service and to seek an adjustment for any assessment levied against PLHC.

Secretary, Pennsylvania Public Utility Commission March 16, 2012 Page 2 of 2

PLHC has not installed any tubular steel product during the preceding calendar year and does not own or operate any hazardous liquids pipelines. Therefore, PLHC has not filled out Attachments A and C to the registration form.

If there are any questions regarding the information contained in this filing, please feel free to contact me at 410-689-7517.

Sincerely,

Richard T. Miller

Vice President and Assistant General Counsel

Alpha Natural Resources Services, LLC

For Pennsylvania Land Holdings Company, LLC