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Legal Counsel.

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July 1, 2014

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

Re: BI&E v.Snyder Brothers, Inc., No. ~~C-2014-240276~~

C-2014-2402746

Dear Secretary Chiavetta:

Enclosed is the Answer of Snyder Brothers, Inc. to the Petition for Stay recently filed by the Bureau of Investigation and Enforcement.

If your office has any questions feel free to contact me.

Respectfully,



Thomas C. Reed
Counsel for Snyder Brothers, Inc.

cc: Heidi Wushnuske, Esquire
Kevin Moody, Esquire

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, :
Bureau of Investigation and Enforcement, :
: :
Complainant. : Docket No. C-2014-2402746
: :
v. : :
: :
Snyder Brothers, Inc., : :
: :
Respondent. : :
: :
And : :
Pennsylvania Independent Oil and Gas : :
Association ("PIOGA"), : :
: :
Intervenor : :

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RESPONDENT'S ANSWER TO PETITION FOR STAY

Respondent Snyder Brothers Inc. ("SBI") hereby files the following Answer to Petition for Stay ("Petition") filed by the Bureau of Investigation and Enforcement ("BI&E") and in support thereof states:

1. Paragraph one of the Petitions is admitted only to the extent that it accurately describes the nature of the Complaint filed against SBI and the date it was filed. It is specifically denied that SBI violated Act 13 or otherwise owes any additional Impact or Administrative Fees.
2. Paragraph two of the Petition is admitted only to the extent that it accurately describes BI&E's claim. It is specifically denied that SBI violated Act 13 or otherwise owes any additional Impact or Administrative Fees.
3. Paragraph three of the Petition is admitted.
4. Paragraph four of the Petition is admitted.

5. Paragraph five of the Petition is admitted only to the extent it accurately described BI&E's Petition for Interlocutory Review and Answer ("Petition for Review"). By way of further answer SBI and PIOGA have both *opposed the Petition for Review*. Attached hereto and incorporated by reference are true and correct copies of SBI's and PIOGA's Briefs in opposition to the Petition for Review.

6. Paragraph six of the Petition is admitted.

7. Paragraph seven of the Petition is admitted.

8. Paragraph eight of the Petition is admitted.

9. Paragraph nine of the Petition is admitted. By way of further answer the Commission did not stay these proceedings.

10. Paragraph ten of the Petition is a conclusion of law to which no respond is required. By way of further answer, the Petition for Review filed by BI&E raises a *mixed question of law and fact* but fails to attach any evidence to support the "facts" upon which its legal theory rests, including its claim that a well which produces more than 90,000 cubic feet of gas in one month of the year is "obviously capable" of producing more than amount during other months of the same year; and, a factual claim which is refuted by the record being established before the ALJ in this matter. Furthermore, the Petition for Review is a cynical attempt to deny SBI its opportunity for a hearing and to avoid having to respond to recently filed discovery requests submitted by PIOGA, which requests relate directly to other unsupported factual claims advanced by BI&E in its brief in support of its Petition for Review.

11. Paragraph eleven of the Petition is a conclusion of law to which no respond is required.

12. Paragraph twelve of the Petition is admitted.

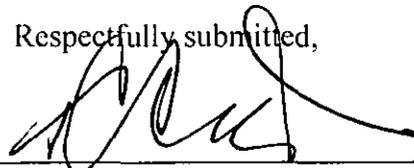
13. Paragraph thirteen of the Petition is a conclusion of law to which no respond is required. To the extent an answer is deemed required the allegations in said paragraph are denied. On the contrary, consistent with the Pre-Hearing Order entered in this matter BI&E can respond to SBI's pending Motion for Summary Judgment which will result in this matter moving forward in a far more timely, expeditious and appropriate manner and enable the issues raised by BI&E's complaint to be properly resolved on a full record.

14. Paragraph fourteen of the Petition is a conclusion of law to which no respond is required. To the extent an answer is deemed required the allegations in said paragraph are denied. On the contrary, consistent with the Pre-Hearing Order entered in this matter BI&E can respond to SBI's pending Motion for Summary Judgment which will result in this matter moving forward in a far more timely, expeditious and appropriate manner and enable the issues raised by BI&E's complaint to be properly resolved on a full record.

15. Paragraph fifteen of the Petition is a conclusion of law to which no respond is required. To the extent an answer is deemed required the allegations in said paragraph are denied. On the contrary, consistent with the Pre-Hearing Order entered in this matter BI&E can respond to SBI's pending Motion for Summary Judgment which will result in this matter moving forward in a far more timely, expeditious and appropriate manner and enable the issues raised by BI&E's complaint to be properly resolved on a full record.

16. Alternatively, where BI&E is seeking to impose "interest" on fees it claims are due any stay should be accompanied by an order suspending any claim for interest for the duration of the stay.

WHEREFORE, SBI respectfully requests that the Petition be denied and an order entered reaffirming the existing deadlines set forth in the controlling Pre-Hearing Order which has been entered in this matter.

Respectfully submitted,


July 1, 2014

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*Counsel for Respondent Snyder Brothers,
Inc.*

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, :
Bureau of Investigation and Enforcement, :

Complainant. :

Docket No. C-2014-2402746

v. :

Snyder Brothers, Inc., :

Respondent. :

And :

Pennsylvania Independent Oil and Gas
Association ("PIOGA"), :

Intervenor :

ORDER

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AND NOW this _____ day of July the Petition for a Stay filed by the Bureau of Investigation and Enforcement is denied.

BY _____

Administrative Law Judge

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served upon the persons listed below this 17th day of April 2014 in the manner indicated:

SERVICE BY FIRST CLASS MAIL ADDRESSED TO:

Heidi L. Wushinske, Esquire
P.O. Box 3265
Harrisburg, PA 17105-3265

Kevin J. Moody, Esquire
212 Locust Street
Suite 300
Harrisburg, PA 17101-1510

Dated: July 1, 2014



Thomas C. Reed, Esquire

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HONORABLE ROSEMARY CHIAVETTA
SECRETARY
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1710532653265

