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July 6, 2015

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

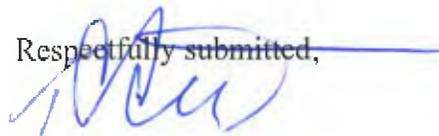
Re: PUC, Bureau of Investigation and Enforcement v. Snyder Brothers, Inc. Docket No.  
C-2014-2402746

Dear Secretary Chiavetta:

Enclosed is a Petition For Stay which requests that enforcement of the Commission's  
June 11, 2015 Order in this matter be stayed while SBI pursues its right to appeal said order.

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

Respectfully submitted,



Thomas C. Reed  
Counsel for Snyder Brothers, Inc.

cc: John Herzog, Esquire  
Heidi L. Wushinske, Esquire  
Kevin J. Moody, Esquire  
Gladys Marie Brown  
Bohdan R. Pankiu, Esquire  
w/enclosure

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	No. C-2014-2402746
Bureau of Investigation and Enforcement	:	
	:	
v.	:	
Snyder Brothers, Inc.	:	

**SNYDER BROTHERS, INC.’S MOTION TO STAY THE JUNE 11, 2015 ORDER OF  
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Snyder Brothers Inc. (“SBI”) hereby files this Motion to Stay the June 11, 2015 Order of the PUC and requests that the PUC accept as security an Appeal Bond pending the final resolution of this matter by the appellate courts. In support thereof, SBI states:

1. This matter involves a dispute over whether SBI owes additional impact fees, administrative fees, stipulated penalties and interest for calendar years 2011 and 2012 pursuant to Act 13 of 2012, the Unconventional Gas Well Impact Fee Act (“Act 13”), which amended Title 58 (Oil and Gas) of the Pennsylvania Consolidated Statutes.

2. By and Order and Opinion dated June 11, 2015 (“PUC Order”) the PUC directed SBI to pay an additional \$390,250.00 in impact and administrative fees, plus statutory interest of \$11,707.50 together with a statutory penalty of \$97,562.50 (for a total of \$499,520.00), finding that certain of SBI’s unconventional gas wells with purely vertical boreholes were not (as asserted by SBI) exempt from payment of Act 13 fees because said wells did not, based on their reported average daily production for each month of the reporting period, meet the PUC’s interpretation of the statutory term “stripper wells.”

3. SBI has filed an appeal from the PUC Order which has been docketed with the Commonwealth Court at 1043 CD 2015.

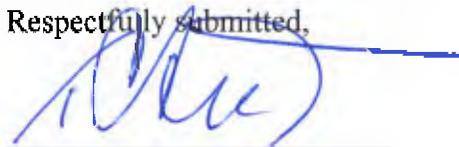
4. It is SBI's understanding that there is no mechanism whereby the PUC can once the date for distribution thereof has passed, "refund" Act 13 payments made to the PUC.

5. The PUC Order required SBI to pay the amount owed by June 31, 2015; however, Counsel for the PUC agreed to extend this deadline while the issue of security for payment pending appeal was discussed.

6. The posting of an appeal bond, in the form attached hereto as Exhibit "A," will fully protect both the rights of both SBI, the PUC, and the public, pending final resolution of this matter.

WHEREFORE, SBI respectfully requests that the attached Order be entered which stays the requirement of SBI to make the disputed Act 13 payments pending completion of appellate review.

Respectfully submitted,



Dated: July 6, 2015

Thomas C. Reed (Id No. 19913)  
Brandon D. Coneby (ID No. 87490)  
Dinsmore & Shohl, LLP  
One Oxford Centre, Suite 2800  
Pittsburgh, PA 15219  
412-281-5096  
*Counsel for Snyder Brothers, Inc.*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	No. C-2014-2402746
Bureau of Investigation and Enforcement	:	
	:	
	:	
v.	:	
Snyder Brothers, Inc.	:	

**EXHIBIT**

EXHIBIT A: Appeal Bond

To BE SUBMITTED

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	No. C-2014-2402746
Bureau of Investigation and Enforcement	:	
	:	
	:	
v.	:	
Snyder Brothers, Inc.	:	

**ORDER**

AND NOW, this \_\_\_\_ day of July, 2015, it is hereby ORDERED that the request of Snyder Brothers, Inc. ("SBI") to stay the June 11, 2015 Order is granted, the Commission's Order dated June 11, 2015 in the above captioned matter is stayed, and the attached form of Appeal Bond shall be filed with Secretary.

BY THE COMMISSION

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission : No. C-2014-2402746  
Bureau of Investigation and Enforcement :  
:   
v. :   
Snyder Brothers, Inc. :

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of July, 2015 service of the foregoing was made upon the persons listed below in the manner indicated:

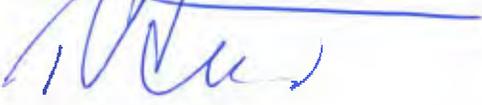
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