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April 20, 2017

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta
Pennsylvania Public Utility Commission
Second Floor, 400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

**RE: Docket No. C-2017-2599382 (Snyder Brothers, Inc.)
Request For Stay Of Proceedings**

Dear Ms. Chiavetta:

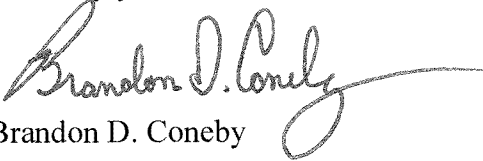
I have been retained to represent Snyder Brothers, Inc. in the above-referenced enforcement action brought by the Bureau of Investigation and Enforcement which relates to the alleged failure of Snyder Brothers, Inc. to pay “impact fees” and “administrative charges” associated with “stripper wells” for the calendar year 2013. As you are aware, there is a significant difference of opinion between Snyder Brothers, Inc. and the Pennsylvania Public Utility Commission regarding the definition of the term “stripper well” under 58 P.S. § 2301. This disagreement is the subject of ongoing litigation between the parties (PUC Docket No. 2014-2402746 and Pennsylvania Commonwealth Court Docket No. 1043 CD 2015). Recently, the Pennsylvania Commonwealth Court agreed with the position of Snyder Brothers, Inc. that a well which produces less than 90,000 cubic feet of gas per day in **any single month** in a calendar year is a “stripper well” not subject to “impact fees” and “administrative charges.” *Snyder Brothers, Inc. v. Pa. Public Utility Comm’n*, 1043 C.D. 2015, 2017 Pa. Commw. LEXIS 88 (Pa. Cmwlth. 2017). Based upon a review of the April 11, 2017 correspondence from Ms. Gladys Brown to Governor Wolf, it is my understanding that it is extremely likely that the Pennsylvania Public Utility Commission will appeal the recent decision of the Pennsylvania Commonwealth Court.

The Pennsylvania Public Utility Commission’s final decision on whether to appeal and the ultimate resolution of the ongoing litigation will undoubtedly have a substantial impact upon the status of the above-referenced enforcement action. As such, I respectfully request that an Order be entered which stays the above-referenced enforcement action pending a resolution of the ongoing litigation before the appellate courts. I have spoken with Counsel for the Bureau of Investigation and Enforcement and she agrees that a stay of the above-referenced enforcement matter is appropriate.

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If you have any questions regarding this request, please feel free to give me a call at 412-288-5859.

Sincerely yours,


Brandon D. Coneby

cc: Ms. Heidi Wushinske (via electronic mail)