

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jason Paul	:	
	:	
v.	:	
	:	
Alliance Petroleum Corporation a/k/a	:	C-2020-3021361
Diversified Production LLC	:	

**DEFENDANT ALLIANCE PETROLEUM CORPORATION A/K/A
DIVERSIFIED PRODUCTION LLC'S PRE-TRIAL MEMORANDUM**

The Pennsylvania Public Utility Commission has set the above styled action for pre-trial hearing on the 12th day of November, 2020, at 10:00 a.m. The following is submitted on behalf of Defendant Alliance Petroleum Corporation a/k/a Diversified Production LLC (“Diversified”):

1. Presently Identified Issues:

a. Mr. Paul demands from Diversified “[a] full detail as to the operation, status to the “Gondor” (presumably the Gondor R H 1) vertical gas well, production records, person in charge, safety conditions, location of horizontal gas lines under my property. In addition a full explanation why Indiana PA location refuses to have a safety or public relations department competent of safety concerns of public.”

b. Mr. Paul recently sent to Diversified copies of real estate deeds which, after review by Diversified, indicate that Mr. Paul owns a small royalty interest in the Gonder R H 1 well; he does not own the property where the well is physically located. Following the discovery of Mr. Paul’s royalty ownership interest, Diversified promptly changed its royalty ownership records to reflect Mr. Paul’s royalty interest. Through

research, Diversified further discovered that a small royalty payment due to Mr. Paul is currently being held in a suspense account for Mr. Paul by Diversified. Diversified attempted to contact Mr. Paul by telephone to discuss his royalty interest.

c. Diversified has provided oil and gas production records for the Gondor R H 1 well and has also provided Mr. Paul with a list of Diversified contacts who may be able to address Mr. Paul's inquiries and arrange for the payment of the royalty suspense funds to Mr. Paul.

d. In the Complaint, Mr. Paul repeatedly refers to Alliance Petroleum Corporation a/k/a Diversified as a utility. Please note that Diversified is not a public utility. Diversified engages in oil and gas production operations from wells that are duly permitted, bonded, and operated by Diversified under the terms of applicable oil and gas leases and in full compliance with all state and federal regulations, including any applicable public relations and disclosure requirements. The Pennsylvania DEP website indicates there are no active violations associated with the subject well or with Diversified as operator of the well.

2. Diversified's Potential Witnesses:

Though formal discovery has not yet occurred, Diversified anticipates calling the following witnesses while reserving the right to amend its pretrial memorandum to add additional witnesses prior to the trial of this matter:

- a. Charles E. Miller IV
Landman, Pennsylvania
Diversified Production LLC
130 Raymond Drive
Indiana, Pennsylvania 15701

Mr. Miller will testify to the ownership interest of Mr. Paul in the Gondor R H 1 oil

and gas well and to Diversified's customary practice and procedures regarding responding to information requests by individuals who are or claim to be mineral owners or oil and gas well interest owners.

b. Representatives of Diversified's Indiana, Pennsylvania, office. These individuals would testify to the same or similar issues listed in Mr. Miller's expected testimony set forth in paragraph 2(b) immediately above including Diversified's policies on oil and gas well and pipeline safety.

c. Mr. Jason Paul. Diversified will call Mr. Paul to address the issues set forth in Mr. Paul's Complaint.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of November, 2020, I electronically filed the foregoing “Defendant Alliance Petroleum Corporation a/k/a Diversified Production LLC’s Pre-trial Memorandum” with the clerk of the Commission using the Pennsylvania Public Utility Commission’s eService system, which will send notification of such filing to the following:

JASON PAUL
132 CESSNA HILL RD
BOSWELL PA 15531
Accepts eService

Respectfully submitted,



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