

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

STECKMAN RIDGE GP, LLC,	:	
SPECTRA ENERGY TRANSMISSION	:	
RESOURCES, LLC AND NJR	:	No.
STECKMAN RIDGE STORAGE	:	
COMPANY, partners trading as	:	
STECKMAN RIDGE, LP, a Delaware	:	Civil Action
joint venture limited	:	
partnership,	:	
	:	Eminent Domain
Plaintiff	:	
	:	
v.	:	FILED ELECTRONICALLY
	:	
EXCLUSIVE NATURAL GAS STORAGE	:	Injunctive Relief
EASEMENTS BENEATH TWO PARCELS	:	Requested
OF 183.73 and 35.27 ACRES,	:	
MORE OR LESS, IN MONROE	:	
TOWNSHIP, BEDFORD COUNTY,	:	
COMMONWEALTH OF PENNSYLVANIA;	:	
and 8.58 ACRES OF LAND, MORE	:	
OR LESS, IN MONROE TOWNSHIP,	:	
BEDFORD COUNTY, COMMONWEALTH	:	
OF PENNSYLVANIA; and	:	
	:	
PAUL C. STUP and HELEN T.	:	
STUP,	:	
	:	
Defendants	:	

NOTICE

TO: PAUL C. STUP and HELEN T. STUP  
P. O. Box 64  
Clearville, PA 15535

You are hereby notified that a complaint in condemnation has been filed in the Office of the Clerk of the United States District Court for the Western District of Pennsylvania in the United States Courthouse in Pittsburgh, Pennsylvania for the taking of permanent and temporary easements for use in

constructing, operating, and maintaining a natural gas pipeline in connection with a natural gas storage project in the interstate commerce on the property described in the attached exhibits B-1 and B-2 in which you have or claim an interest.

The easement interests to be taken are further described in the diagram attached as exhibits C-1 and C-2.

The Federal Energy Regulatory Commission has issued a Certificate of Public Convenience and Necessity to Steckman Ridge, LP, authorizing the construction, operation and maintenance of facilities relating to a natural gas storage facility located in Monroe Township, Bedford County, Pennsylvania.

The authority for the taking is the Natural Gas Act, 15 U.S.C. § 717f(h).

You may view a copy of the complaint filed in this action at the Office of the Clerk in the United States Courthouse, 7th and Grant Streets, Pittsburgh, Pennsylvania or the United States Courthouse, 208 Penn Traffic Building, 319 Washington Street, Johnstown, Pennsylvania.

You are further notified that if you desire to present any objection or defense to the taking of the interest in your property, you are required to serve your answer on the plaintiff's attorney, within twenty (20) days after personal service of this notice upon you, at the following address:

Charles W. Rubendall II, Esquire  
Keefer Wood Allen & Rahal, LLP  
210 Walnut Street  
P. O. Box 11963  
Harrisburg, PA 17108-1963  
717-255-8010  
crubendall@keefewood.com

Pursuant to Federal Rule of Civil Procedure 5(d), you must also file your answer, together with a certificate of service, with the Clerk at the United States Courthouse at 7<sup>th</sup> and Grant Streets, Pittsburgh, Pennsylvania.

Your answer must identify the property in which you claim to have an interest, state the nature and extent of the interest you claim, and state all of your objections and defenses to the taking of your property. All defenses and objections not so presented are waived. In the case of your failure to so answer the complaint, judgment of condemnation of that part of the above-described property in which you have or claim an interest will be rendered. If you fail to answer and provide objections and defenses, however, you may still present evidence as to the amount of compensation to be paid for the property, and you are still entitled to share in that award.

If you fail to answer, you may still serve on plaintiffs' attorney designated above, at the above-indicated address, a notice of appearance designating the property in which you claim to be interested. Such notice of appearance must also be filed with the Court, together with a certificate of service. Thereafter, you will receive notice of all proceedings affecting

the property, including notice of proceedings regarding the award of just compensation. At the trial on the issue of just compensation, you may present evidence as to the amount of compensation to be paid for your property, and you may share in the distribution of the award, even if you have not previously appeared or answered.

This notice is provided pursuant to Federal Rule of Civil Procedure 71.1.

KEEFER WOOD ALLEN & RAHAL, LLP

Dated: July 15, 2008

By s/ Charles W. Rubendall II  
Charles W. Rubendall II  
I.D. # PA23172  
210 Walnut Street  
P. O. Box 11963  
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717-255-8010  
Fax: 717-255-8003  
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Attorneys for plaintiff

**EXHIBIT B-1**

**EXHIBIT B-1**

Lands that defendants Paul C. Stup and Helen T. Stup, husband and wife, own or have an interest in, situated in the County of Bedford, Commonwealth of Pennsylvania, more particularly described as follows:

TRACT NO. 1 - BEGINNING at stones, corner of lands now or late of Arthur Mearkle, thence by same, North 69° 02' West 2211 feet to a post; thence by Tract No. 2 herein, North 34° 37' East 1037.85 feet to a black oak; thence by same, North 27° 37' East 1301.85 feet to stone; thence by Tract No. 3 herein and lands now or late of John Snyder, South 77° 15' East 1653.3 feet to stones; thence by lands or late of John Snyder and Emory Klahre, South 17° 17' West 2521.2 feet to stones, the place of BEGINNING. CONTAINING 104.32 Acres, net, as surveyed by Harry W. Cunard, R.S., April 1, 1958.

TRACT NO. 2 - BEGINNING at a post, corner of Tract No. 1 hereof, thence by lands now or late of Arthur Mearkle, North 69° 02' West 876.15 feet to stones; thence by same, North 21° 20' East 582.45 feet to a post; thence North 45° 20' East 849.75 feet to a post; thence North 55° 40' West 358.05 feet to a white oak; thence by lands now or late of Albert Klahre, North 21° 20' East 1046.1 feet to a post; thence by lands of Marshall Clark and Tract No. 3 herein, South 60° 40' East 1270 feet to stone; thence by Tract No. 1 South 27° 37' West 1301.85 feet to a black oak; thence by same, South 34° 37' West 1037.85 feet to a post, the place of BEGINNING. CONTAINING 57.83 Acres, as surveyed by Harry W. Cunard, R.S., April 1, 1958.

TRACT NO. 3 - BEGINNING at a post, corner of lands now or late of Marshall Clark and Tract No. 2; thence by lands of Marshall Clark, North 14° 30' East 389 feet to stone; thence by remainder of Tract of which this is a part, South 68° 42' East 403.5 feet to an iron pin; thence by same, South 77° 35' East 333.5 feet to an iron pin; thence by same, North 6° 45' East 898.4 feet to a bolt in public highway Route 05011; thence by various courses and distances along center line of said Highway, South 83° 10' East 250.6 feet; South 4° East 552.75 feet to a point; South 24° 30' East 307.72 feet to a point; South 7° 05' East 688.05 feet; thence by Tract No. 1 herein, North 77° 15' West 909.15 feet to stones; thence by Tract No. 2 herein, North 60° 40' West 596.5 feet to a post, the place of BEGINNING. CONTAINING 23.1 Acres, net, as surveyed by Harry W. Cunard, R.S., April 1, 1958.

BEING part of the same premises which John T. Mearkle and Janice H. Mearkle, his wife, granted and conveyed unto Paul C. Stup and Helen T. Stup, his wife, by deed dated October 4, 1982, and recorded in the Office of the Recorder of Deeds for Bedford County in Deed Book 125, Page 347 on October 8, 1982.

Tract No. 2068  
Tax Map No.: G12-00-63

EXCEPTING AND RESERVING thereout and therefrom an approximately 1 acre tract conveyed by Paul C. and Helen T. Stup, his wife, to David R. Stup and Penny K. Stup, his wife by deed dated May 13, 1986 and recorded in the Office of the Recorder of Deeds of Bedford County in Book 271, Page 5 on May 14, 1986.

Tax Map No(s): G12-00-063 and is bounded substantially by lands now or formerly owned as follows:

On the North By: Joseph A. and Luella Bowser

On the East By: James C. and Karla J. Levy

On the South By: Paul C Stup and Helen T. Stup and Edward J. Stup

On the West By: Edward F. and Sandy L. Howsare

and being lands conveyed to Paul C. Stup and Helen T. Stup by deed from Paul C. Stup and Helen T. Stup, his wife, dated August 25, 2005, and recorded in Book 1084 at Page 263 of the records of said county, and containing a total of 184.73 acres, more or less.

**EXHIBIT B-2**

Tract No. 2068.1  
Tax Map No.: G12-00-104 & G12-00-105

### EXHIBIT B-2

Lands that defendants Paul C. Stup and Helen T. Stup, husband and wife, own or have an interest in, situated in the County of Bedford, Commonwealth of Pennsylvania, more particularly described as follows:

Parcel No. 1. BEGINNING at an iron pin in the center of private lane; thence by property of which this was a part designated as Lot No. 2, North 9 degrees 28 minutes West a distance of 300.7 feet to stones; thence North 28 degrees 50 minutes East a distance of 249.0 feet to an iron pipe; thence North 26 degrees 52 minutes East a distance of 306.1 feet to stones on line of land now or formerly of Larry M. Merk; thence by said lands now or formerly of Larry M. Merk, South 68 degrees 45 minutes East a distance of 770.4 feet to stones; thence by lands of which this was a part designated as Lot No. 5, South 13 degrees 40 minutes West a distance of 761.0 feet to an iron pin in private lane; thence in and with private lane, North 77 degrees West a distance of 339.9 feet to a nail in the center line of private lane; thence North      25 minutes West a distance of 375.4 feet to a nail in the center line of private lane; thence South 82 degrees 10 minutes West a distance of 82.3 feet to an iron pin in the center of private lane, the place of BEGINNING. Containing 15.35 acres and being designated as Lot No. 3 per survey of Harry W. Cunard. R.S., dated June 8, 1971.

Parcel No. 2. BEGINNING at stones on line of land now or formerly of Larry Merk, thence South 68 degrees 45 minutes East a distance of 1387.45 feet to a point on line of lands now or formerly of Emory Klahre; thence by lands now or formerly of Emory Klahre and lands now or formerly of Wilfred O. Fredette, South 17 degrees 55 minutes West a distance of 602.0 feet to a point in private lane, thence in and with said private lane, the following (5) courses and distances: North 75 degrees 40 minutes West a distance of 40.0 feet; thence North 60 degrees 12 minutes West a distance of 289.2 feet; thence North 11 degrees 47 minutes West a distance of 198.7 feet to a nail in the center line, thence North 82 degrees 45 minutes West a distance of 67.32 feet to an iron pin and thence North 77 degrees 10 minutes West a distance of 130.5 feet to an iron pin; thence by the dividing line with Lot No. 3, North 13 degrees 40 minutes East a distance of 761.0 feet to stones on line of land now or formerly of Larry Merk, the place of BEGINNING. Containing 19.92 acres and being designated as Lot No. 5 per survey of Harry W. Cunard, R.S. dated June 8, 1971.

EXCEPTING AND RESERVING a parcel conveyed to Wilfred O. Fredette by deed of Lyle E. Hagmann and Holly H. Hagmann, his wife, dated April 4, 1984, and recorded in the records of Bedford County in Record Book 198 at page 227.

Tract No. 2068.1  
Tax Map No.: G12-00-104 & G12-00-105

Tax Map No(s): G12-00-104 & G12-00-105 and is bounded substantially by lands now or formerly owned as follows:

On the North By: Paul C. Stup and Helen T. Stup

On the East By: Richard F. and Pamela Hershberger

On the South By: Glynn H. Needham

On the West By: John K. and Inci K. Willard

and being lands conveyed to Paul C. Stup and Helen T. Stup by deed from Glynn H. Needham dated June 2 1999, and recorded in Book 763 at Page 494 of the records of said county, and containing a total of 35.27 acres, more or less.

**EXHIBIT C-1**

Property Owner:  
 Paul C. & Helen T. Stup  
 P.O.Box 64  
 Clearville, Pa. 15535  
 Tax Parcel No. G12-00-063

Tax Map Parcel G-12-063B

N/F Dwane L. & Linda S. Barkman

This plat does not represent a complete and thorough boundary survey of the property shown. Adequate field survey ties were made to property corners to reference the centerline of the permanent easement and are based upon tax assessment information and deeds of record.

Paul C. & Helen T. Stup  
 Book 1084 Page 263  
 Tract No. 3  
 23.1 Acres  
 Tax Map Parcel G-12-063

N/F James C. & Karla J. Levy  
 Book 257 Page 304  
 Tax Map Parcel G-12-041

**LEGEND**

- Property Line
  - Reference Centerline
  - Permanent Easement
  - Temporary Easement Area
- Permanent Easement Area = 3.87 Acres

Paul C. & Helen T. Stup  
 Book 1084 Page 263  
 Tract No. 2  
 57.83 Acres  
 Tax Map Parcel G-12-063

Temporary Easement Area = 1.58 Acres

S 13°12'26" E 251.28'

Corner C/L Road

Temporary Easement Area = 0.30 Acres

C/L Line 91

C/L Line 91G

Existing Well Stup 1557

N/F David R. & Penny K. Stup  
 Book 271 Page 005  
 Tax Map Parcel G-12-086

CENTERLINE LINE 91		
LINE	BEARING	DISTANCE
L1	S 75°50'39" W	145.78'
L2	S 36°02'28" W	68.34'
L3	S 05°23'42" E	135.90'
L4	S 05°23'42" E	327.73'
L5	S 26°20'16" E	363.19'
L6	S 07°14'20" E	29.77'
L7	S 07°14'20" E	95.71'
L8	S 07°32'53" E	16.04'
L9	S 07°32'53" E	74.00'
L10	S 54°23'02" E	40.00'
L11	S 59°03'53" E	159.61'
L12	S 16°11'41" E	429.39'
L13	S 17°04'31" E	198.49'
L14	S 15°19'35" E	153.32'
L15	S 15°19'35" E	48.62'
L16	S 24°20'42" E	29.06'
CENTERLINE LINE 91H		
L17	N 18°49'43" E	188.27'
L18	N 27°43'51" E	576.22'
L19	N 24°13'09" E	275.17'
L20	N 11°19'50" E	242.00'
L21	N 06°14'31" E	184.35'
L22	N 76°00'45" E	210.32'
L23	N 68°20'32" E	69.38'
L24	N 37°45'40" E	88.58'
L25	N 82°45'40" E	50.00'
CENTERLINE LINE 91G		
L26	S 82°45'40" W	101.35'

TEMPORARY WORKSPACE		
AREA	LENGTH	WIDTH
A1	67.73'	50'
A2	56.61'	25'
A3	135.38'	50'
A4	673.11'	25'
A5	662.30'	10'
A6	598.71'	10'
A7	275.58'	15'
A8	691.17'	25'
A9	108.41'	15'
A10	663.71'	25'
A11	643.90'	15'

Temporary Easement Area = 0.15 Acres

Temporary Easement Area = 0.23 Acres

Paul C. & Helen T. Stup  
 Book 1084 Page 263  
 Tract No. 1  
 104.32 Acres  
 Tax Map Parcel G-12-063

Temporary Easement Area = 1.14 Acres

C/L Line 91H

Tax Map Parcel G-12-049

Paul C. & Helen T. Stup  
 Book 763 Page 495  
 Parcel No. 1  
 15.35 Acres  
 Tax Map Parcel G-12-104

Paul C. & Helen T. Stup  
 Tax Map Parcel G-12-105

S 75°32'22" E

S.R 05010

S 10°34'06" W

1190.02' I.Pipe

N/F James C. & Karla J. Levy  
 Book 257 Page 304  
 Tax Map Parcel G-12-041



Drawn By:	TEK
Checked By:	MDF
Date:	06-25-2008
Scale:	1" = 400'
Project No.:	0469-S064
File Name:	Stup G12-00-063.dwg
Drawing:	1 of 1

**CME**  
 ENGINEERING  
 CME ENGINEERING LP  
 165 East Union Street, Suite 100, Somerset, PA 15501  
 814-443-3344 FAX: 814-444-0365

**STECKMAN RIDGE, LP**  
 STECKMAN RIDGE STORAGE PROJECT  
 TRACT 91-8, 91G-1, 91H-1 LEASE # 2068  
 MONROE TOWNSHIP  
 BEDFORD COUNTY, PENNSYLVANIA

**EXHIBIT C-2**

Property Owner:  
Paul C, Helen T. & Ed Stup  
P.O. Box 64  
Clearville, PA 15535  
G-12-00-105

Paul C. & Helen T. Stup  
Book 1084 Page 263  
Tract No. 1  
104.32 Acres  
Tax Map Parcel G-12-063

Paul C. & Helen T. Stup  
Book 763 Page 495  
Parcel No. 2  
19.92 Acres  
Tax Map Parcel G-12-00-105

Paul C. & Helen T. Stup  
Book 763 Page 495  
15.35 Acres  
Tax Map Parcel G-12-104

Temporary Easement  
Area = 0.44 Acres




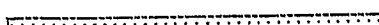
S 87°59'42" E 327.57'

Glynn H. Needham  
Book 474 Page 516  
38.8 Acres  
Tax Map Parcel G-12-00-049A

CENTERLINE LINE 91H		
LINE	BEARING	DISTANCE
L1	S 18°49'43" W	5.47'
L2	S 01°33'45" E	271.36'
L3	S 21°33'03" E	464.54'
L4	S 22°33'57" E	19.36'

TEMPORARY WORKSPACE		
AREA	LENGTH	WIDTH
A1	7.79'	15'
A2	527.39'	25'
A3	100.00'	40'
A4	136.93'	15'

**LEGEND**

-  Property Line
-  Centerline 50' Easement
-  Permanent Easement
-  Temporary Easement Area

Permanent Easement Area = 0.87 Acres

This plat does not represent a complete and thorough boundary survey of the property shown. Adequate field survey ties were made to property corners to reference the centerline of the permanent easement and are based upon tax assessment information and deeds of record.



Drawn By:	EDS
Checked By:	MDF
Date:	06-03-2008
Scale:	1" = 200'
Project No.:	0469-S064
File Name:	Stup G12-00-105.dwg
Drawings:	1 of 1

**CME**  
ENGINEERING  
CME ENGINEERING LP  
165 East Union Street, Suite 100, Somerset, PA 15501  
814-443-3344 FAX: 814-444-0365

**STECKMAN RIDGE, LP**  
STECKMAN RIDGE STORAGE PROJECT  
TRACT 91H-1A LEASE #2068  
MONROE TOWNSHIP  
BEDFORD COUNTY, PENNSYLVANIA