

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

STECKMAN RIDGE GP, LLC, et al	)	
	)	
<i>Plaintiff,</i>	)	
	)	
vs.	)	No.: 3:08-CV-177-KRG
	)	
	)	Civil Action
AN EXCLUSIVE NATURAL GAS	)	
STORAGE EASEMENT BENEATH	)	Eminent Domain
100.00 ACRES, MORE OF LESS,	)	
IN MONROE TOWNSHIP,	)	
BEDFORD COUNTY,	)	FILED ELECTRONICALLY
COMMONWEALTH OF	)	
PENNSYLVANIA; and 0.82 ACRES	)	
OF LAND, MORE OR LESS, IN	)	
MONROE TOWNSHIP, BEDFORD	)	
COUNTY, COMMONWEALTH OF	)	
PENNSYLVANIA	)	
	)	
KENNETH R. KLAHRE and	)	
SANDRA K. KLAHRE,	)	
	)	
<i>Defendants.</i>	)	

**ANSWER OF CONDEMNES TO COMPLAINT IN EMINENT DOMAIN**

Kenneth R. Klahre and Sandra K. Klahre, husband and wife, owners of property acquired by them consisting of 100 acres located in Bedford County, Pennsylvania, Deed Book 151, page 092, Tax Map Parcel G-12-00-062, hereafter called “Condemnees,” by Thomas J. Dempsey, Esquire, their attorney, answer the complaint of Steckman Ridge, LP, as follows:

First Defense

The complaint of the plaintiff should be dismissed as premature because the Certificate of Public Convenience issued by the Federal Energy Regulatory Commission,

upon which the condemnation is based is the subject of a Motion for Rehearing premised upon a recent interest expressed by an energy company in developing and extracting natural gas from the Marcellus Shale formation which would be curtailed, to the loss of the citizens of the United States, by the proposed Steckman Ridge gas storage field. The Order Granting Rehearing for Further Consideration was entered at Docket No.CP08-15-001 of the Federal Energy Regulatory Commission.

Second Defense

Alternatively to dismissing the complaint, all proceedings should be suspended until the issues raised in the motion for rehearing are resolved by the Federal Energy Regulatory Commission.

Third Defense

If the condemnation is not dismissed, the Condemnees claim entitlement to the payment of just compensation for the taking of part of their property.

Condemnees demand a JURY TRIAL.

/s/ Thomas J. Dempsey

Thomas J. Dempsey

Pa. I.D. #00508

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