

**IN THE COURT OF
COMMON PLEAS OF
WASHINGTON COUNTY,
PENNSYLVANIA
CIVIL DIVISION**

IN RE: CONDEMNATION BY THE PENNSYLVANIA TURNPIKE COMMISSION OF ANY AND ALL RIGHTS IN AND TO THE USE OF THE SURFACE OF 18.253 ACRES OF PROPERTY ARISING FROM ALL OIL AND GAS LEASES AND/OR ASSIGNMENTS THEREOF OF PROPERTY LOCATED IN THE TOWNSHIP OF CECIL, COUNTY OF WASHINGTON, COMMONWEALTH OF PENNSYLVANIA, FOR THE CONSTRUCTION OF THE SOUTHERN BELTWAY, U.S. ROUTE 22 TO I-79 PROJECT (PART OF TAX PARCEL NO. 140-012-00-00-0094-000)

TO: JJ OIL & GAS, INCORPORATED, a Pennsylvania corporation, DALE PROPERTY SERVICES PENN, LP, a Texas limited partnership, itself and as successor in interest by conversion of DALE PROPERTY SERVICES PENN, LLC, an inactive-cancelled Texas limited liability company, DALE PENNSYLVANIA ROYALTY, LP, a Texas limited partnership, CHESAPEAKE APPALACHIA, L.L.C., an Oklahoma limited liability company, STATOILHYDRO USA ONSHORE PROPERTIES, INC., a Delaware corporation, now known as EQUINOR USA ONSHORE PROPERTIES INC., a Delaware corporation, RANGE RESOURCES – APPALACHIA, LLC, a Delaware limited liability company, and EQUITABLE GAS COMPANY, their successors in interest and assigns, all as their interests may appear.

ALL THAT CERTAIN piece of land located in the Township of Cecil, County of Washington, Commonwealth of Pennsylvania identified on the PTC Property Plot Plan, being Exhibit "B" attached to the Declaration of Taking.

NOTICE OF PRESENTATION

Kindly take notice that the within Petition To Deposit Estimated Just Compensation and Obtain a Writ of Possession will be presented to the Honorable Gary Gilman, Judge of the Court of Common Pleas of Washington County, Pennsylvania, 1 South Main Street, Washington, PA 15301 in Courtroom No. 7 on Tuesday, February 20, 2024 at 9:15 AM, or as soon as thereafter meets the convenience of the Court

Robert J. Wratcher,
Esq. Wratcher Law LLC
3824 Northern Pike, Suite 925
Monroeville, PA 15146
(412) 904-1875
rwratcher@wratcherlaw.com

**PETITION TO DEPOSIT
ESTIMATED JUST
COMPENSATION
AND OBTAIN A WRIT OF
POSSESSION**

The Pennsylvania Turnpike Commission files this Petition To Deposit Estimated Just Compensation and Obtain a Writ of Possession pursuant to the Eminent Domain Code of 2006, Act of May 4, 2006, P.L. 112, No. 34, §1, 26 Pa.C.S. §101 et seq and respectfully declares the following:

1. The Pennsylvania Turnpike Commission, an instrumentality of the Commonwealth of Pennsylvania, with its principal office at Exit 247 of the Pennsylvania Turnpike system located in Lower Swatara Township, Dauphin County, Pennsylvania. Its post office address is P.O. Box 67676, Harrisburg, Pennsylvania, 17106-7676.

2. On October 31, 2023, a Declaration of Taking was filed at the above caption, term and number by The Pennsylvania Turnpike Commission to obtain, inter alia, a fee simple interest and permanent and temporary easements in a portion of real estate owned by the Condemnees and situated in the Township of Cecil, Washington County, Pennsylvania for the construction of the Southern Beltway, U.S. Route 22 to I-79 Project.

3. On November 16, 2023 and January 3, 2024, the Condemnees were served a true and correct copy of the Notice to Condemnees and Declaration of Taking of record in this matter.

4. The Pennsylvania Turnpike Commission has estimated the Just Compensation for the taking of the condemned property to be Five Thousand and No/100 Dollars (\$5,000.00).

5. The Pennsylvania Turnpike Commission has offered to pay the Estimated Just Compensation directly to the Condemnees.

6. The Condemnees have not responded, and thus are not willing to accept payment of the Estimated Just Compensation.

7. Upon Payment of the Estimated Just Compensation to the Prothonotary by The Pennsylvania Turnpike Commission, it is requested that this Honorable Court grant The Pennsylvania Turnpike Commission a Writ of Possession for the condemned property as described in the Declaration of Taking.

8. I, Robert J. Wratcher, Esquire, counsel for the Pennsylvania Turnpike Commission do hereby propose, swear and affirm that I am authorized to and do hereby execute this Petition To Deposit Estimated Just Compensation and Obtain Possession on behalf of the Pennsylvania Turnpike Commission, and the averments set forth herein are true and correct to the best of my knowledge, information and belief, and are made subject to the penalties provided in 18 Pa. C.S. §4904.

WHEREFORE, Condemnor, The Pennsylvania Turnpike Commission, respectfully requests that this Honorable Court direct payment of the aforesaid Estimated Just Compensation into the Prothonotary, to be held until further Order of Court directing payment of said amount to the Condemnee and to persons entitled thereto pursuant to 26 Pa. C.S.A. §307 and further issue judgment for a Writ of Possession to the Condemnor, Pennsylvania Turnpike Commission for entry onto such condemned property.

ORDER OF COURT

AND NOW, this ___ day of _____, 2024, upon presentation of the within Petition To Deposit Estimated Just Compensation and Obtain a Writ of Possession, it is hereby ORDERED that the sum of Five Thousand and No/100 Dollars (\$5,000.00), representing the amount of Estimated Just Compensation due to the Condemnees be paid into the Prothonotary to be held in a non-interest bearing account until further Order of Court directing payment of said amount to the Condemnees or persons entitled thereto pursuant to the Pennsylvania Eminent Domain Code.

IT IS FURTHER ORDERED that upon payment of the Estimated Just Compensation into the Prothonotary, judgment for a Writ of Possession shall issue to The Pennsylvania Turnpike Commission for all real property identified and described in the Declaration of Taking.

BY THE COURT: _____, J.

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Filed on behalf of Condemnor, Pennsylvania Turnpike Commission /s/ Robert J. Wratcher, Esq.