

HERITAGE GATEWAY CENTER • 1980 SOUTH EASTON ROAD • SUITE 220 • DOYLESTOWN, PA 18901 (267) 898.0570 • (800) 773.0680 • FAX (215) 340.3929 WWW.CURTINHEEFNER.COM JOHN W. DONAGHY
FRANK S. GUARRIERI
ALLAN D. GOULDING, JR.
MAUREEN BURKE CARLTONAERNEST R. CLOSSER III
FRANCIS X. STECKLAIR *
KYONG HA GROWNEYALISA M. PATTERSONACAROLYN M. ANGELACCIOAMICHAEL P. MAGUIREATHERSA M. GOLDINGALAUREN M. WILLIAMS

* LL.M. TAXATION EDWA
+ LL.M. TRIAL RONA
- ALSO ADMITTED IN NI DOUG

WILLARD S. CURTIN 1932-1996 GILBERT J. GOLDING *
BONNIE S. STEIN *+
ROBERT A. BADMAN, JR. *
KRISTA P. HARPER *
JORDAN B. YEAGER
ROBERT SZWAJKOS
JOHN J. HART
MATTHEW J. BASS *
JAMES J. ESPOSITO *
SEAN R. SULLIVAN
MARIA K. McGINTY-FERRIS *
CATILIN M. GRAY *

OF COUNSEL EDWARD I. DOBIN RONALYN SISSON DOUGLAS H. RIBLET

WILLIAM F. HEEFNER

February 8, 2012

Sent via facsimile & regular mail

Paul O. Swartz Executive Director Susquehanna River Basin Commission 1721 N. Front Street Harrisburg, PA 17102

Re: Records Request

Dear Mr. Swartz:

We are writing to request copies of the records listed below from the Commission. Please accept this request under the Commission's records policy and all other applicable laws and regulations.

As used in this request, "documents" means any writing or tangible thing in any form whether paper, computer record, or any other type of electronic record, including without limitation, correspondence, notes, memoranda, reports, summaries, charts, and graphs. Also, as used in this request, "waters of the basin" refers to both surface water and groundwater within the Susquehanna River Basin. "The Compact" refers to the Susquehanna River Basin Compact.

Please provide the following documents for the period from January 1, 2006 to the present:

- 1. Any and all documents that constitute any determinations by the Commission concerning whether the Commonwealth of Pennsylvania has complied with the requirements of the Compact and/or the rules and regulations of the Commission.
- 2. Any and all documents that constitute any determinations by the Commission concerning whether the Commonwealth of Pennsylvania has prohibited and controlled pollution of the waters of the basin according to the requirements of the Compact.
- 3. Any and all documents that constitute any determinations by the Commission concerning whether the Commonwealth of Pennsylvania has cooperated faithfully in the control of future pollution in and abatement of existing pollution from waters of the basin.



- 4. Any and all documents that constitute any determinations by the Commission concerning whether the Commonwealth of Pennsylvania—in considering, authorizing, constructing, maintaining, or operating water resources projects—has considered the compatibility of such projects with the public values identified in Section 9.1 of the Compact.
- 5. Any and all documents referring or relating to any effects of natural gas drilling operations in the Susquehanna River basin on the quality of the waters of the basin.
- 6. Any and all documents constituting any Commission determinations of whether the Commonwealth of Pennsylvania's water quality standards for any waters of the basin are in the public interest in relation to the reasonable and necessary use of such waters.
- 7. Any and all documents constituting any Commission recommendations to the Commonwealth of Pennsylvania, pursuant to Article 5, Section 5.2(c) of the Compact, concerning the establishment, modification, or amendment of water quality standards that would be in the public interest in relation to the reasonable and necessary use of the waters of the basin.
- 8. Any and all documents constituting any Commission determinations concerning whether the establishment, modification, or amendment of water quality standards for any waters of the basin would be in the public interest in relation to the reasonable and necessary use of such waters.
- 9. Any and all documents constituting any analysis to determine whether, because of natural gas drilling operations or its effects, the establishment, modification, or amendment of water quality standards would be in the public interest in relation to the reasonable and necessary use of the waters of the basin.

We kindly request a waiver of the fees, as this request seeks information that serves the public interest in understanding the Commission's determinations. If the Commission declines to waive fees, we request a cost estimate before any charges are incurred. We also ask that the Commission, to the extent possible, provide the documents in electronic form.

Thank you.

Jordan B. Yeager

Sincerely

For CURTIN & HEEFNER LLP