

RECEIVED
DEC 27 2024

BY: ACR

Application for Variance, Special Exception or Appeal 2024-0015

Applicant: Range Resources - Appalachia, LLC (If other than property owner attach proper documentation)

Applicant address: 3000 Town Center Blvd. City: Canonsburg St: PA Zip: 15317

Phone: 724-873-3281 Fax: _____ Email: broot@rangeresources.com

Property Owner: N/A

Address: _____ City: _____ St: _____ Zip: _____

Phone: _____ Fax: _____ Email: _____

Property / Site Information:

Location: N/A

Parcel Id. _____ Subdivision: _____

Lot Size: _____ Existing zoning: _____ Existing land use: _____

Has any previous appeal been filed in connection with this property? [] Yes [] No

If yes, when and for what: N/A

Nature of Request: Substantive validity challenge of Cecil Township Ordinance No. 9-2024. See attached description for further information.

I hereby certify that the above information and the statements and/or representations contained in any and all papers or plans submitted herewith are true and accurate to the best of my knowledge and belief.

Brian R...
Applicants Signature

12/26/24
Date

For township use

Date of submission: 12/27/24

Date of Hearing: 1/20/25

Fee Paid: \$525.00 Check No. 10440

Receipt #: 522818

Zoning hearing boards decision: [] Approved [] Denied [] Approved with conditions

Comments or conditions: _____

ATTACHMENT

Range Resources – Appalachia, LLC (“Range”) submits this challenge to the substantive validity of Cecil Township Ordinance No. 9-2024, pursuant to Sections 909.1(a)(1) and 916.1 of the Pennsylvania Municipalities Planning Code (“MPC”). Ordinance No. 9-2024, adopted by the Township Board of Supervisors on November 4, 2024, substantially amended Chapter 240 of the Township Code of Ordinances, Zoning, with respect to the regulation of unconventional natural gas development.

Range is a leading developer and producer of natural gas from horizontal wells in Pennsylvania, and has operated in Cecil Township for over 13 years. Range is committed to developing natural gas in a manner that benefits the entire community with the least possible inconveniences during its temporary development and permanent production of its wells.

Ordinance No. 9-2024 prohibits and restricts the use and development of land in which Range has a property or other proprietary interest. Cecil Township’s application and enforcement of Ordinance No. 9-2024 improperly restricts Range’s development of oil and gas resources in the Township. As a result, Range hereby challenges the substantive validity of the following sections of Ordinance No. 9-2024.



- Section 240-61.C(5). The setback requirements constitute an impermissible *de facto* exclusion of oil and gas development from the Township.
- Section 240-61.C(36). The setback requirements constitute an impermissible *de facto* exclusion of oil and gas development from the Township.

Range reserves the right to supplement this substantive validity challenge and/or challenge the validity of all or portions of Ordinance No. 9-2024 in other appropriate forums.

Cecil Township

Receipt for Payment

Date	12/27/2024	522818	
Received_From:	Range Resources	Dollar_Amount	\$525.00
	Five Hundred Twenty-Five & 00/100	Dollars	
Receipt_Purpose	Zoning App Fee	Receipt_Account_No	
Payment_Type	Check	Check_No	10440
Clerk	Liz	Print	

 RANGE RESOURCES®	Range Resources Corporation and subsidiaries 100 Throckmorton Street, Suite 1200 Fort Worth, TX 76102 VendorRelations@rangeresources.com	Fraud Protected by Positive Pay	JPMORGAN CHASE BANK, N.A. DALLAS, TX 32-61/1110	10440
FIVE HUNDRED TWENTY-FIVE AND 00 /100		DATE 12/20/2024	AMOUNT \$**525.00	
PAY TO THE ORDER OF	CECIL TOWNSHIP 3599 MILLERS RUN ROAD CECIL PA 15321	VOID AFTER 90 DAYS	 AUTHORIZED SIGNATURE	Details on back
Vendor Number 289250				
⑈010440⑈ ⑆111000614⑆		791781039⑈		

Board Members:

Chairman

Eric J. Sivavec

Vice Chairman

Cindy Fisher

Board Members

Thomas A. Casciola

Ronald A. Fleeher

Darlene Barni



Township Manager:

Donald A. Gennuso

(724) 745- 2227

Fax (724) 745-2905

Web: www.ceciltownship-pa.gov

Cecil Township

Washington County – Commonwealth of Pennsylvania
3599 Millers Run Road, Suite 101, Cecil, PA 15321

ESCROW REPORTING FORM

Application #: 2024-0015

Plan Name: Range Resources Substantive Validity Challenge




Escrow Fund #: 31-

Deposit Amount: \$1,000.00 (Range Resources, Check # 10439)

Deposit Description: public hearing expenses

Invoicing/Contact Information:
 Brian Root, Assistant General Counsel
 broot@rangeresources.com
 (724)873-3281

Date: 12/27/24

 RANGE RESOURCES®	Range Resources Corporation and subsidiaries 100 Throckmorton Street, Suite 1200 Fort Worth, TX 76102 VendorRelations@rangeresources.com	JPMORGAN CHASE BANK, N.A. DALLAS, TX 32-61/1110	10439
	ONE THOUSAND AND 00 /100	Fraud Protected by Positive Pay	DATE 12/20/2024
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⑈010439⑈ ⑆111000614⑆ 791781039⑈

JONES DAY

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DIRECT NUMBER: +1.412.394.7995

KABROWN@JONESDAY.COM

December 27, 2024

SUBMITTED BY HAND DELIVERY

Cecil Township Zoning Hearing Board
c/o Elizabeth Ross, Zoning Officer
Cecil Township Municipal Building
3599 Millers Run Road
Cecil, PA 15321

RECEIVED
DEC 27 2024

BY: *[Signature]*

Re: Cecil Township Ordinance No. 9-2024

Dear Ms. Ross:

My firm represents Range Resources – Appalachia, LLC (“Range”), which is challenging the substantive validity of Cecil Township Ordinance No. 9-2024 before the Cecil Township Zoning Hearing Board. Enclosed, please find the following: (1) a completed application form with attachment; and (2) checks to cover the applicable fees and escrow.

Please ensure that I am copied on all future correspondence regarding this matter, and do not hesitate to reach out if you require anything further.

Very truly yours,

/s/ Kimberly A. Brown

Kimberly A. Brown

CC: Brian C. Root