

BY: MAR	Application for Vari	iance, Special	Excep	tion or Ap	peal 2024-	001
Applicant: Range Reso	•	(If other than property owner attach proper documentation)				
Applicant address: 3000	Town Center Blvd.					
Phone: 724-873-3281						
Property Owner: N/A						
Address:					St: Zip:	
Phone:						
Property / Site Informati						
Location: N/A						
Parcel Id.		Subdivision:				
Lot Size: Existing zoning:						
Has any previous appeal been filed in connection with this property?						
If yes, when and for what:						
Nature of Request: Subs	724					
I hereby certify that the ab papers or plans submitted	ove information and the herewith are true and a	Securate to the be	or represent of m	y knowledge	contained in any a e and belief.	nd all
Date of submission: 12 Fee Paid: \$\square \int \cap \int	27 24 2 Check No	10440	e of Hea	Receipt #:		
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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.

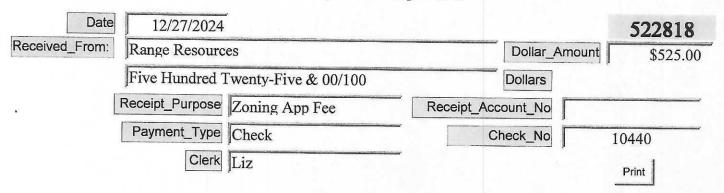
Ordinance No. 9-2024 prohibits and restricts the use and development of land in which Range has a property or other proprietary interest. Cecil Township's application and enforcement of Ordinance No. 9-2024 improperly restricts Range's development of oil and gas resources in the Township. As a result,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



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

> DATE 12/20/2024

AMOUNT

\$**525.00

10440

Details on back.

a

FIVE HUNDRED TWENTY-FIVE AND 00 /100

PAY TO THE **ORDER** OF

CECIL TOWNSHIP 3599 MILLERS RUN ROAD CECIL PA 15321

Vendor Number 289250

VOID AFTER 90 DAYS

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"Olo440" :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 Corporation and subsidiaries

100 Throckmorton Street, Suite 1200 Fort Worth, TX 76102 VendorRelations@rangeresources.com

Fraud Protected by Positive Pay

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DALLAS, TX 32-61/1110

> DATE 12/20/2024

10439

AMOUNT \$**1,000.00

ONE THOUSAND AND 00 /100

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PA 15321

10 7 9 9

VOID AFTER 90 DAYS

Vendor Number 289250

JONES DAY

500 GRANT STREET, SUITE 4500 • PITTSBURGH, PENNSYLVANIA 15219.2514

TELEPHONE: +1.412.391.3939 • JONESDAY.COM

DIRECT NUMBER: +1.412.394.7995 KABROWN@JONESDAY.COM

DECEIVED N DEC 2 7 2024

BY: HRAS

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

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