

GREAT OAK ENERGY, INC.

March 7, 2012

Ms. Rosemary Chiavetta
Secretary, PA Public Utility Commission
Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

RE: Act 127 of 2011 "Pipeline Act"

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SECRETARY'S BUREAU

M-2011-2271982

Dear Ms. Chiavetta:

In January, Great Oak Energy, Inc. ("Great Oak") received notification from the Pennsylvania Public Utility Commission that the Commission believes that Great Oak may be a Pennsylvania pipeline operator pursuant to the Pipeline Act. This letter is to inform the Commission that Great Oak has reviewed all company pipelines with reference to the Pipeline Act and has arrived at the determination that all company pipelines, including the pipeline servicing Great Oak's sole unconventional gas well, are "Production Operations" and cannot be considered "Onshore Gathering Line". Therefore, all of Great Oak's pipeline facilities as of this date are not regulated under Federal pipeline safety laws and are not within the scope of the Commissions jurisdiction under the Pipeline Act.

This determination is based upon the definition of an "onshore gathering line" which is referenced in 49 CFR 192.8(a) and **API Recommended Practice 80**. More specifically we reference Section 2.3, Definition of Production Operation, and Section 3.1.5 thru 3.1.5.3, Typical Appalachian Production Operations, of **API Recommended Practice 80**.

In closing, while Great Oak is supportive of the Commissions efforts to improve pipeline safety, we do not believe that Great Oak's pipelines fit the definition of an entity that must register with the Commission. Therefore, we respectfully request that Great Oak be removed from the Commissions mailing list.

Thank you in advance for your consideration in this matter.

Very Truly yours,



Edward A. Klammer

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