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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of)	Case No. 09-1982-GA-CSS
Cutter Exploration, Inc.)	
)	
Complainant,)	
)	
v.)	
)	
The East Ohio Gas Company d/b/a)	
Dominion East Ohio,)	
)	
Respondent.)	

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JOINT MOTION FOR STAY OF PROCEEDINGS

Now comes Complainant, Cutter Exploration, Inc., ("Cutter Exploration") and Respondent, The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO"), by and through their respective counsel, and hereby move for an order staying all proceedings in this matter through and until May 5, 2011, pursuant to the terms set forth below. The parties have determined that a stay of the proceedings at this time will permit the parties to engage in substantive settlement discussions regarding the matters in dispute. The parties are in agreement with the following terms concerning the relief sought:

1. All pending motions will not be ruled upon at this time and no further briefs will be filed concerning any of the pending motions to compel before the Commission. Should this matter be reactivated, Cutter Exploration will file any reply briefs in support of the pending motions to compel within three (3) business days after entry of an order reactivating the case.

2. On or before May 5, 2011, the parties will jointly provide a status report to the attorney-examiner as to whether a resolution has been reached by the parties, or if this matter needs to be reactivated for further proceedings before the Commission.

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3. All discovery in this matter is stayed with the following exception. To the extent DEO is required to proceed with annual inspections of any meter stations which are associated with wells owned or operated by Cutter Exploration, the parties have agreed to the following:

- (a) DEO Ohio will notify Cutter Exploration at least 48 hours in advance of conducting an annual inspection of the meter station so it may have one or more representatives present.
- (b) Any and all oil/fluid drained from the gear boxes of the rotary meters on the meter stations will be collected and preserved as follows. The parties will use a container provided by Cutter Exploration that holds no less than 16 ounces (the "Oil Container") to capture all of the oil/fluid drained from each rotary meter gear box. Each Oil Container will be marked with a label identifying the rotary meter, the specific gear box on the meter, if applicable, and date the gear box oil was drained.
- (c) DEO will retain custody of all Oil Containers which will be kept closed and stored at DEO facility in Northeast Ohio.
- (d) In the event this case is reactivated, upon request of Cutter Exploration, DEO will release custody of the Oil Containers to North Coast Environmental Laboratories, Inc. ("North Coast") for analysis and testing by North Coast.
- (e) Cutter Exploration agrees that before any testing of the oil/fluid in the Oil Containers is conducted by North Coast, Cutter Exploration will inform DEO of the proposed testing to be performed. DEO will have five (5) business days to make any objections to the proposed testing before any of the testing will be conducted.
- (f) Cutter Exploration will pay for the services provided by North Coast and any results obtained by North Coast or all documentation regarding the testing generated by North Coast will be shared with DEO.

Respectfully submitted,

David A. Kutik
by Stephen C. Fitch per official authority

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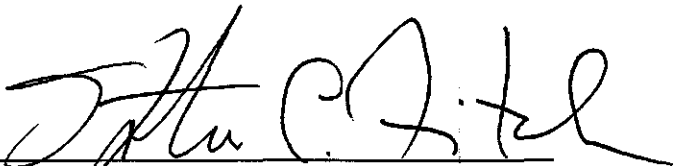
Attorneys for Cutter Exploration, Inc.

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Joint Motion for Stay of Proceedings* was served by electronic and regular U.S. mail, postage prepaid on March 24, 2011 upon the following:

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