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June 19, 2014

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JUN 19 2014

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**VIA OVERNIGHT FEDERAL EXPRESS**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Re: Sunoco Pipeline L.P.'s Answer to the Preliminary Objections of the Concerned  
Citizens of West Goshen Township, Docket No. P-2014-2411966

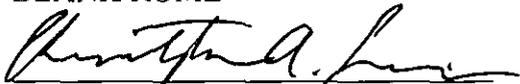
Dear Secretary Chiavetta,

Enclosed please find Sunoco Pipeline L.P.'s Answer to the Preliminary Objections of the  
Concerned Citizens of West Goshen Township related to the above docket number. A copy has  
been served in accordance with the enclosed certificate of service.

If you have any questions, please do not hesitate to contact me.

Sincerely yours,

BLANK ROME



Christopher A. Lewis (ID #29375)

Blank Rome LLP

One Logan Square

Philadelphia, PA 19103

Phone: (215) 569-5793

*Counsel for Sunoco Pipeline, L.P.*

cc: Administrative Law Judge Elizabeth H. Barnes (via First-Class Mail and E-Mail)  
Administrative Law Judge David A. Salapa (via First-Class Mail and E-Mail)  
Certificate of Service

**BEFORE THE  
COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Sunoco Pipeline L.P. for a Finding That the Situation of Structures to Shelter Pump Stations and Valve Control Stations is Reasonably Necessary for the Convenience and Welfare of the Public

Docket No. P-2014-2411966

**RECEIVED**

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PA PUBLIC UTILITY COMMISSION  
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**SUNOCO PIPELINE L.P.'S ANSWER TO THE  
FURTHER PRELIMINARY OBJECTIONS OF  
CONCERNED CITIZENS OF WEST GOSHEN TOWNSHIP**

Pursuant to 52 Pa. Code § 5.101(f), Sunoco Pipeline, L.P. (“SPLP”) files this Answer to the Further Preliminary Objections of Concerned Citizens of West Goshen Township (“CCWGT”). For the reasons set forth below, the Pennsylvania Public Utility Commission (the “Commission”) should deny the Preliminary Objections of CCWGT.

**PRELIMINARY STATEMENT**

The Commission’s preliminary objection practice is similar to Pennsylvania civil practice. *Equitable Small Transp. Intervenors v. Equitable Gas Co.*, 1994 Pa. P.U.C. LEXIS 69 (July 18, 1994). When considering preliminary objections, the Commission may not rely upon the factual assertions of the moving party, but must accept as true, for purposes of disposing of the objections, all well-pleaded, material facts of the non-moving party, as well as every reasonable inference from those facts; a pleading may be dismissed only if the non-moving party would not be entitled to relief under any circumstances as a matter of law.

When considering preliminary objections, the Commission must determine:

[w]hether the law says with certainty, based on well-pleaded factual averments...that no recovery or relief is possible. *P.J.S. v. Pa. State Ethics Commission*, 669 A. 2d 1005 (Pa. Cmwlth. 1996). Any doubt must be resolved in favor of the non-moving party by refusing to sustain the preliminary objections. *Boyd v. Ward*, 802 A.2d 705 (Pa.Cmwlth. 2002).

*Dept. Auditor General, et al. v. State Employees' Retirement System, et al*, 836 A. 2d

1053, 1064 (Pa. Cmmw. Ct. 2003). Furthermore,

[i]n considering preliminary objections, the Commission may not rely upon the factual assertions of the moving party, but must accept as true for purposes of disposing of the motion all well-pleaded, material facts of the nonmoving party, as well as every inference from those facts. *County of Allegheny v. Commonwealth of Pennsylvania*, 507 Pa. 360, 490 A. 2d 402 (1985); *Commonwealth of Pennsylvania v. Bell Telephone Co. of Pa.*, 551 A. 2d 602 (Pa. Cmwlth. 1988). In this case, the Commission must view the Complaint in the light most favorable to the Complainant, and should dismiss the Complaint only if it appears that the Complainant would not be entitled to relief under any circumstances as a matter of law. *Equitable Small Transportation Intervenors, supra*. Only the facts in the Complaint and the Response to Preliminary Objections can be presumed to be true in order to determine whether recovery is possible.

*Maria Povacz v. PECO Energy Co.*, 2013 WL 392699 (Pa.P.U.C. Jan. 24, 2013).

To withstand a preliminary objection alleging insufficient specificity, a pleading need not produce evidence. *Podolak v. Tobyhanna Tp. Bd. Of Supervisors*, 37 A. 3d 1283, 1288-89 (Commw. Ct. 2012). "A case is not tried at the preliminary objection phase of litigation." *Id.*, quoting *General State Authority v. The Sutter Corporation*, 69 Pa. Cmwlth. 504, 452 A. 2d 75, 78 (1982) (citing *Department of Transportation v. Bethlehem Steel Corp.*, 33 Pa. Cmwlth. 1, 380 A. 2d 1308, 1313)." Rather, a pleading is sufficiently specific if it enables the other party to prepare a defense. *Podolak, supra*.

As explained more fully below, CCWGT's Preliminary Objections must be denied for the following reasons:

- (1) Contrary to CCGWT's mistaken supposition, because the Marcus Hook Industrial Complex is situated in both Pennsylvania and Delaware, it is possible to configure the pipelines so that the *intrastate* service remains entirely within Pennsylvania, while *interstate* service is routed through Delaware;
- (2) The Boot Road site in West Goshen Township is part of the direct route from Mechanicsburg to Point Breeze, Pennsylvania, with two pipelines running through the Boot Road site, and an additional pipeline running from the Boot Road site to Fullerton, Pennsylvania. While SPLP has suspended the *tariffs on service for gasoline and distillates* for pipeline movements that originate at Point Breeze and end at Mechanicsburg, and abandoned *tariffs on service for gasoline and distillates* for pipeline movements that originate in Twin Oaks and end at Icedale, Malvern, and points west of Mechanicsburg, SPLP continues to provide transportation service of petroleum products and refined petroleum products (gasoline and distillates) on pipeline movements through the Boot Road site (utilizing the Boot Road pump station in connection with this service) to Montello. SPLP will continue to provide these transportation services even after the completion of the Mariner East project.

CCWGT evidently has the mistaken impression that SPLP has abandoned physical pipelines and the use of the Boot Road site. This is simply not true. SPLP has never abandoned any pipelines themselves, including the *two* pipelines that run through the Boot Road site and the pipeline from the Boot Road site to Fullerton. The Boot Road site, including the pump station, continues in active operation today for both the

*interstate and intrastate* transportation of petroleum products and refined petroleum products;

(3) The vapor combustion unit is a piece of equipment, not a “building”, and therefore section 619 of the Municipalities Planning Code (“MPC”) is inapplicable to its installation; and

(4) There is no legal requirement that a petition brought under section 619 of the MPC contain detailed information relating to the precise location of the structures or anticipate unknown and unknowable environmental objections. The former is addressed through pre-filed testimony, while the latter must be raised by the intervenors in their own pre-filed testimony (assuming that the environmental objections relate to the *siting* of the structures).

### **ANSWER TO NUMBERED PARAGRAPHS**

#### **Background and Common Facts**

1. Admitted, except that SPLP denies that Appendix A to CCWGT’s Preliminary Objections contains all relevant portions of the 2013 Form 10-K.
2. Admitted.
3. Admitted.
4. Admitted, except that SPLP denies that CCWGT “demonstrated” that SPLP was not regulated as a public utility under federal law and, therefore, did not meet the requirements of a “public utility corporation” under the MPC.

5. SPLP admits that on May 8, 2014, SPLP filed an Amended Petition claiming for the first time in this proceeding that it would be providing intrastate transportation of propane from Mechanicsburg to SPLP's facilities in Twin Oaks, Pennsylvania. SPLP denies that its authority to provide such service has been suspended. By Order entered on August 29, 2013 and subsequently clarified on October 17, 2013, the Commission approved SPLP's Petition to temporarily suspend service for the transportation of *gasoline and distillate* on the pipeline route that extended from Twin Oaks to Exton, Fullerton, Macungie, Montello, Mechanicsburg, Tamaqua, Williamsport, and Kingston, and the pipeline route from Point Breeze to Mechanicsburg.<sup>1</sup> Each "route" reflects an origination and destination point listed in SPLP's tariff. Absent the suspension, shippers would have continued to have the right to demand service from SPLP under the tariff to transport gasoline and distillate from the listed originations to the listed destinations. Shippers continue to demand, and SPLP continues to provide, transportation services for petroleum products and refined petroleum products, including gasoline and distillates from Point Breeze through the Boot Road site to Montello. SPLP's *authority* under its Certificates of Public Convenience ("CPCs") to provide transportation service for petroleum products and refined petroleum products was never suspended; only the *portion of the service to transport gasoline and distillate designated in the tariffs from particular origination points to particular destination points* was suspended.

6. SPLP denies that the intrastate use of the pipeline is "newly concocted" or a "subterfuge." In its Amended Petitions, SPLP has explained the business reasons why it is accelerating its plan for the provision of intrastate service for the transportation of propane.

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<sup>1</sup> See *Petition of Sunoco Pipeline, L.P. for Approval of Temporary Suspension of Petroleum Products Transportation Service From: (1) Point Breeze to Mechanicsburg and (2) Twin Oaks to Exton, Fullerton, Macungie, Montello, Mechanicsburg, Tamaqua, Williamsport, and Kingston*, Order, Docket Nos. A-2013-2371789, P-2013-2371775 (August 29, 2013, as amended Oct. 17, 2013).

These facts must be taken as true for purposes of disposing of CCWGT's Preliminary Objections. *Maria Povacz v. PECO Energy Co.*, 2013 WL 392699 (Pa. P.U.C. Jan. 24, 2013). Further, in presentations made to the public—including the one attached to CCWGT's Preliminary Objections as Appendix C—SPLP has emphasized the market potential arising from the opportunity to make intrastate and regional shipments of propane during the winter season. On page 15 of Appendix C, titled "Northeast Propane Distribution Potential," SPLP identified multiple distribution points to take advantage of "[r]efinery and local propane terminal closings" and the "propane shortage [that] exists in local markets." The map of the potential market opportunity includes numerous distribution points in Pennsylvania.

7. Admitted, except to the extent that the Marcus Hook Industrial Complex is located both in Claymont, Delaware and Marcus Hook, Pennsylvania, and therefore, any propane delivered to Twin Oaks could be transported to the Marcus Hook Industrial Complex wholly within Pennsylvania.

8. Denied as stated. While SPLP admits that the quote set forth in paragraph 8 of CCWGT's Preliminary Objections appears on page 39 of SPLP's 10-K, SPLP denies any implication that Mariner East will not also be used for intrastate transportation service, as set forth in the Amended Petition. SPLP's business plan has always contemplated the intrastate transportation of propane for delivery in Pennsylvania. Although SPLP originally prioritized the interstate delivery of ethane and propane, for the reasons set forth in the Amended Petition, SPLP has accelerated its plans to provide the intrastate transportation of propane within Pennsylvania.

9. SPLP denies that it is not physically possible to simply deliver propane to Twin Oaks, as CCWGT claims. SPLP initially will make intrastate transportation of propane available

from Mechanicsburg to Twin Oaks, followed, upon action of the Commission, by the availability of intrastate transportation of propane from Delmont to Twin Oaks, with customers being able to pick up propane at the truck rack at the Marcus Hook Industrial Complex in Pennsylvania. Upon completion of the pipeline from Houston, PA to Delmont, PA and unless and until the second phase of the Mariner project – Mariner East 2 -- is completed, transportation of propane, for both intrastate and interstate delivery will be made as part of the transportation of an ethane/propane mix. While being transported on the pipeline as an ethane/propane mix, it is true that an industrial process will be used to split the mix of ethane and propane into its component parts at a splitter located at a site at the Marcus Hook Industrial Complex in Pennsylvania. In order to deliver propane intrastate, the ethane/propane mix will be routed to the splitter on a pipeline segment wholly within Pennsylvania and made available at truck racks at the Marcus Hook Industrial Complex located in Pennsylvania. For *intrastate* shipments, therefore, propane will be transported on a pipeline wholly within Pennsylvania to a splitter located in Pennsylvania for delivery to a truck rack located in Pennsylvania and will never leave the Commonwealth of Pennsylvania. For *interstate* shipments, by contrast, SPLP will route the mix to the splitter through a pipeline that runs through Claymont Delaware into storage at the Marcus Hook Industrial Complex or onto barges for export. If and when the Mariner East 2 project is completed, ethane and propane will not be mixed and will be able to be transported on separate pipelines, with transportation of propane having numerous off-take destinations in Pennsylvania, including Twin Oaks, Schaefferstown, and Montello. Finally, in considering CCWGT's Preliminary Objections, the Commission must accept as true the allegation made by SPLP in the Amended Petition that intrastate transportation will be offered. *Maria Povacz v. PECO Energy Co., supra.*

10. The April 29 presentation provides an overview of the Mariner East Project. SPLP developed the project, and has continued to refine it, to respond to the needs of shippers as expressed in the market. In the earliest stages of project development, shippers prioritized take-away capacity for ethane, given the abundance of this particular NGL in the production from the “wet” gas region of the Marcellus Shale. Without finding a solution for take-away capacity of ethane, there could be no concomitant solution for propane or other natural gas liquids derived from the wet gas. Lacking a reliable supply of ethane, refiners and manufacturers in the northeast U.S. never built plants or facilities to make use of this petroleum product. Consequently, the only markets that currently exist for ethane are either abroad or along the Gulf Coast, and SPLP’s initial focus was to ensure that take-away capacity for ethane was addressed thereby allowing the development of a take-away solution for propane. Propane, by contrast, is used locally and regionally, as well as abroad.

On page 15 of the April 29 presentation, SPLP explains the market potential for distribution of propane in the northeast U.S. from the Mariner East Project. The slide identifies multiple storage and distribution options, including many within the Commonwealth of Pennsylvania. Contrary to the allegations of fact in CCWGT’s Preliminary Objections, SPLP always considered the northeast propane distribution potential beginning with the first phase of the Mariner East Project (commonly referred to as Mariner East 1). That is one reason, among others, why *intrastate* transportation service for propane shipments presents such a compelling business case, and the reason SPLP accelerated its plans to provide intrastate transportation service for propane.

In the second phase of the Mariner East Project (commonly referred to as Mariner East 2), having already addressed market demand for take-away capacity for ethane and intrastate

transportation of propane, SPLP would convert the existing pipeline to ethane-only service and rely on a new pipeline constructed as part of Mariner East 2 to continue to provide the *intrastate* service for propane and other natural gas liquids (and potentially other petroleum products and refined petroleum products). The “open season” for Mariner East 2 recently ended and clearly demonstrated significant shipper interest for additional pipeline capacity of propane, ethane and other natural gas liquids for interstate and intrastate transportation to the Marcus Hook Industrial Complex and other destination points within Pennsylvania. If built, Mariner East 2 would substantially enlarge the capacity of the Mariner East Project for both *intrastate* and *interstate* transportation of propane and other natural gas liquids.

Except as set forth above, SPLP denies the allegations contained in paragraph 10 of CCWGT’s Preliminary Objections.

11. SPLP denies the allegations of paragraph 11 of CCWGT’s Preliminary Objections for the reasons set forth in paragraph 10 above.

Preliminary Objection 1 Must Be Denied Since SPLP Plans for Mariner East 1 to Provide Intrastate Service

12. Denied.

13. SPLP admits that its Amended Petition does not assert a claim that it is a “public utility corporation” under the MPC by virtue of its status as a federally regulated pipeline. SPLP is a public utility corporation by virtue of its existing Certificates of Public Convenience which enable it to provide transportation of petroleum products and refined petroleum products and which remain active as evidenced by SPLP’s intrastate movements of products.

14. CCWGT’s allegation that SPLP will not use the pipeline to provide intrastate transportation of propane is an allegation of fact that cannot be considered in disposing of

CCWGT's Preliminary Objections. To the contrary, the Commission must accept the factual averments of the Amended Petition as true. *Maria Povacz v. PECO Energy Co., supra.* By way of further answer, SPLP states that shippers *are* being notified of the potential to use Mariner East 1 to ship propane to domestic markets and markets within Pennsylvania. In particular, the shippers who just this past winter had shipped propane by truck from western Pennsylvania are now being notified that SPLP plans to make this service available on the pipeline, first from Mechanicsburg and then from Delmont, Pennsylvania.

15. Denied. SPLP incorporates herein by reference its answer in paragraph 14 above.

16. Denied. SPLP incorporates herein by reference its answer in paragraph 9 above.

17. Denied. While, upon completion of an additional pipeline as part of Mariner East 2, if Mariner East 2 is built, SPLP intends to convert one pipeline to ethane-only transportation, leaving the other pipeline for transportation of propane and other natural gas liquids service. SPLP denies that it has any plans to abandon the *intrastate* service for transportation of propane. To the contrary, the plan in Mariner East 2, if it is built, is to enlarge the *intrastate* capacity, as well as the *interstate* capacity, by installing a new pipeline along a parallel route.

Preliminary Objection 2 Must be Denied—SPLP Has the Requisite Authority

18. Denied.

19. Admitted.

20. SPLP's map shows *service*. While the lines on the map generally track the physical location of the pipelines, they are not intended to fix the geographical locations of the pipelines. In fact, SPLP has two pipelines, one 8" pipeline and one 12" pipeline, which run, among other things, through Boot Road in West Goshen Township to Montello. SPLP continues

to provide transportation service of petroleum products and refined petroleum products (gasoline and distillates) through the Boot Road site in West Goshen Township to Montello and through the Boot Road site to Fullerton. From Montello, SPLP has a single 8" pipeline that continues west to Mechanicsburg. To aid CCWGT's understanding of the difference between service and the pipelines themselves, SPLP attaches hereto as Exhibit "A" a map that illustrates the service routes that are suspended, abandoned, and currently in effect, and as Exhibit "B" a map that shows the routes of the physical pipelines.

21. SPLP does not need to abandon service between Montello and Exton because, as noted in paragraph 20 above, it has *two* pipelines between those two points, extending all the way east to Point Breeze. Consequently, SPLP can simultaneously transport product in *both* directions between Montello and Point Breeze, and therefore SPLP can continue to provide the service identified in SPLP's Tariff No. 15.

22. SPLP denies the allegations contained in paragraph 22 of CCWGT's Preliminary Objections for the reasons stated in paragraphs 20 and 21 above. CCWGT's speculation about the location of the physical pipelines is inappropriate for preliminary objections.

23. SPLP denies the allegations contained in paragraph 23 of CCWGT's Preliminary Objections for the reasons stated above.

24. The Commission has jurisdiction over *service* that is provided using the Boot Road site. In fact, SPLP continues to provide transportation service of petroleum products and refined petroleum products (gasoline and distillates) through the Boot Road site to Montello and to Fullerton. SPLP abandoned its tariff for gasoline and distillates service that had been furnished using the 8" pipelines from Point Breeze and Twin Oaks to points west of

Mechanicsburg, so that the physical pipelines would be available for use in the Mariner East Project. SPLP can offer *service* using any of the pipelines between Mechanicsburg and Twin Oaks or Point Breeze simply by filing a tariff with the Commission setting forth the terms and conditions of such service.

Preliminary Objection 3 Must Be Denied—The Amended Petition is Complete

25. Denied.

26. In addition to the control buildings it plans to construct, SPLP does intend to install a “vapor combustion unit” at the Boot Station site. SPLP has not included the vapor combustion unit in its Amended Petition because the unit is not a “building.”

27. SPLP admits that the Amended Petition fails to provide any information on the vapor combustion unit because SPLP is not seeking a finding from the Commission under section 619 of the MPC with respect to the unit.

28. Admitted.

29. Denied as stated. Absent a statutory definition, the Commission may look to standard definitions in dictionaries, but this is not the only possible source of statutory meaning.

30. Admitted.

31. CCWGT has ignored the dictionary definition it cites. The dictionary defines a “building” as a “structure or edifice inclosing a space within its walls.” The vapor combustion unit is a piece of equipment. It is neither a “structure” nor an “edifice,” nor does it have “walls.” Unless a three-dimensional object is solid, it will always “enclose a space.” This does not make the object a “building.”

32. The vapor combustion unit is a unitary, integrated, piece of equipment. Unlike a building, it is not designed for habitation or for the shelter of property. Instead, it is designed to burn off vapors. The vapor combustion unit will not be housed in any structure.

33. As noted above, SPLP is not seeking permission from the Commission to install the vapor combustion unit because none is required. The unit is not a “building”; rather, it is a “public utility facility” that is not properly before the Commission in a section 619 proceeding. *Petition of UGI Penn Natural Gas Inc. for a Finding that Structures to Shelter Pipeline Facilities in the Borough of West Wyoming, Luzerne County, To the Extent considered to be Buildings under Local Zoning Rules, Are Reasonably Necessary for The Convenience or Welfare of the Public*, 2013 WL 6835113, at \*13 (Pa. P.U.C. 2013).

Preliminary Objection 4: The Amended Petition is Sufficiently Specific

34. SPLP denies the assertion that the Amended Petition lacks sufficient specificity. In *In Re: Application of Trans-Allegheny Interstate Line*, 103 Pa. P.U.C. 554, 2008 WL 5786507 (Pa. P.U.C.), ALJs Hoyer and Nemec recommended that TrAILCo’s request for exemption from local zoning regulation be denied because: (1) TrAILCo failed to provide specific evidence regarding the precise location of the buildings within the fenced area; (2) TrAILCo failed to place evidence of the applicable zoning regulations into the record; and (3) TrAILCo failed to provide citations to the exact zoning regulations for which the exemption was sought. *Id.* at \*31. The Commission granted TrAILCo’s exception to the ALJs’ recommendation, ruling that “...TrAILCo is correct that the applicable standard in Section 619 of the MPC, 53 P.S. § 10619, does not require the specificity suggested by the ALJs.” *Id.*, at \*32.

The Commission's ruling in *TrAILCo* came *after* evidence had been introduced into the record. Here, the proceeding has not yet advanced beyond the pleadings stage. Given the Commission's determination in *TrAILCo* that the specificity sought by CCGWT would not be required even at the evidentiary stage, the Amended Petition clearly passes muster.

The Amended Petition contains no discussion of the environmental impact of the proposed buildings on the Boot Station site because there is none. Once SPLP has presented evidence in support of its requested exemption, the burden is on the CCGWT to provide evidence to rebut the proposition that the exemption should be granted. *Id.*, at \*32.

35. Admitted. Both parcels are zoned Residential (R-3). SPLP's existing property was in its current use (industrial) before zoning was enacted and is therefore a permitted nonconforming use. SPLP denies that it is required to submit to local zoning regulation for public utility facilities. *See Duquesne Light Co., supra.*

36. The Commission's decision in *TrAILCo, supra*, makes clear that a petition under section 619 of the MPC need not contain the specificity sought by CCWGT. Accordingly, SPLP denies the legal conclusions asserted in paragraph 36 of CCWGT's Preliminary Objections.

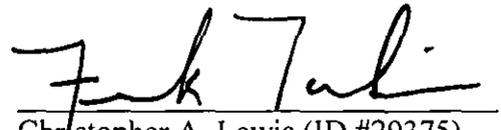
37. In *Pennsylvania American Water Company, Docket No. P-00062226* (Init. Dec. of ALJ Smolen), 2006 Pa. PUC LEXIS 91 (Oct. 25, 2006), finalized by operation of law, 2006 Pa. PUC LEXIS 105 (Nov. 17, 2006), ALJ Smolen considered environmental impact, but only in connection with the record before him as presented in a Joint Settlement Stipulation. ALJ Smolen did not rule that the initial petition seeking relief under Section 619 of the MPC required an evaluation of the environmental impact of the proposal.

38. The Amended Petition alleges that the structures are reasonably necessary for the convenience or welfare of the public, and that the valve control stations ensure that the pipeline facilities operate safely and prevent harm to the public and the environment. *See, e.g., Amended Petition*, ¶¶ 36, 38. Further specificity is not required at this stage of the proceedings. Rather, if CCWGT believe that *environmental harm may arise from the siting of the structures*, they may seek to introduce competent evidence of any alleged harm into the record, and the Commission can then consider this issue in making its findings under section 619.

WHEREFORE, SPLP respectfully requests that the Pennsylvania Public Utility Commission deny the Preliminary Objections of the Concerned Citizens of West Goshen Township.

Dated: June 19, 2014

Respectfully Submitted,  
BLANK ROME LLP



Christopher A. Lewis (ID #29375)  
Michael L. Krancer (ID #39443)  
Frank L. Tamulonis (ID# 208001)  
Melanie S. Carter (ID#312294)  
Blank Rome LLP  
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*Counsel for Sunoco Pipeline L.P.*

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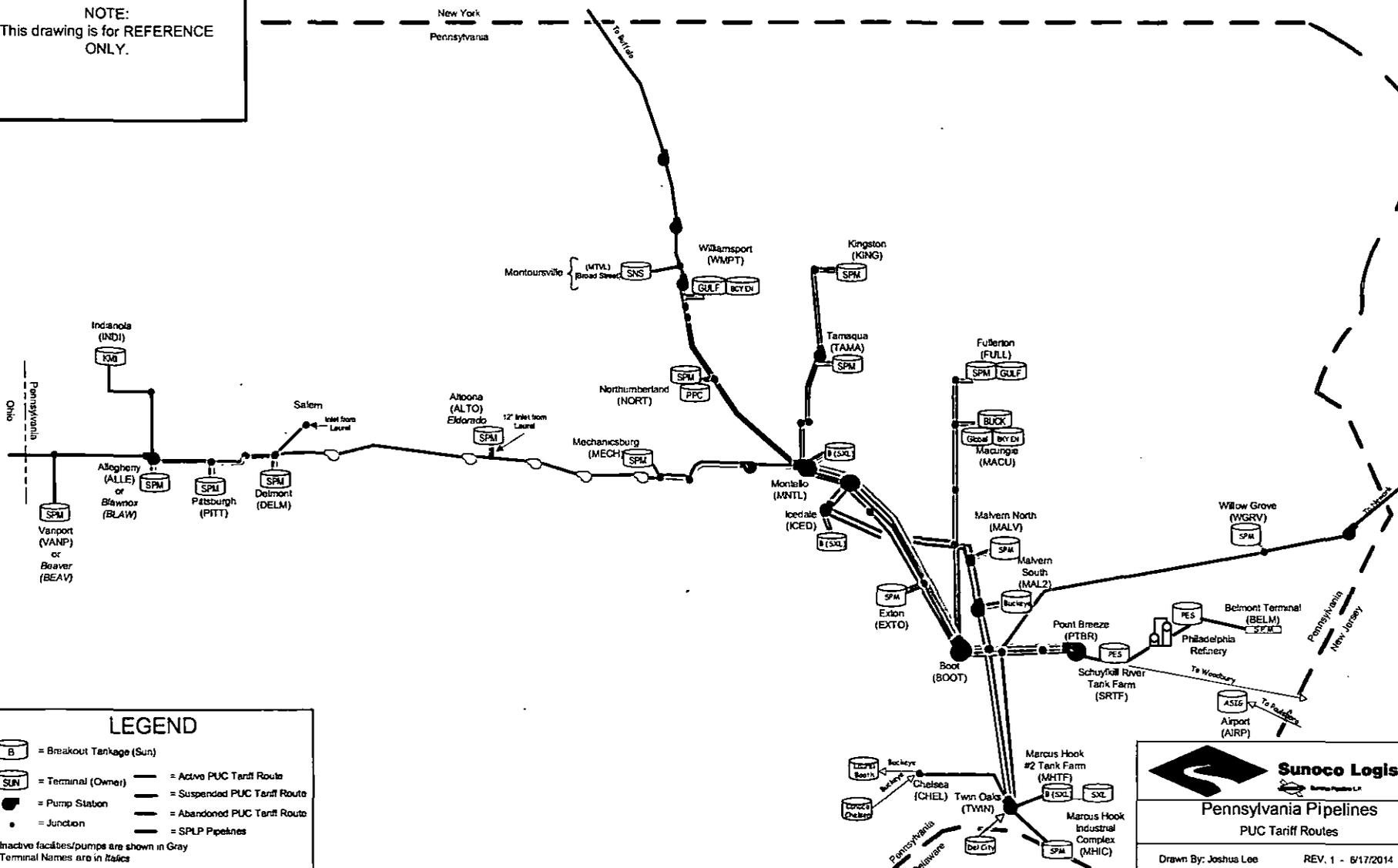
JUN 19 2014

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SECRETARY'S BUREAU

**EXHIBIT "A"**

NOT TO SCALE

NOTE:  
This drawing is for REFERENCE ONLY.



**Sunoco Logistics**  

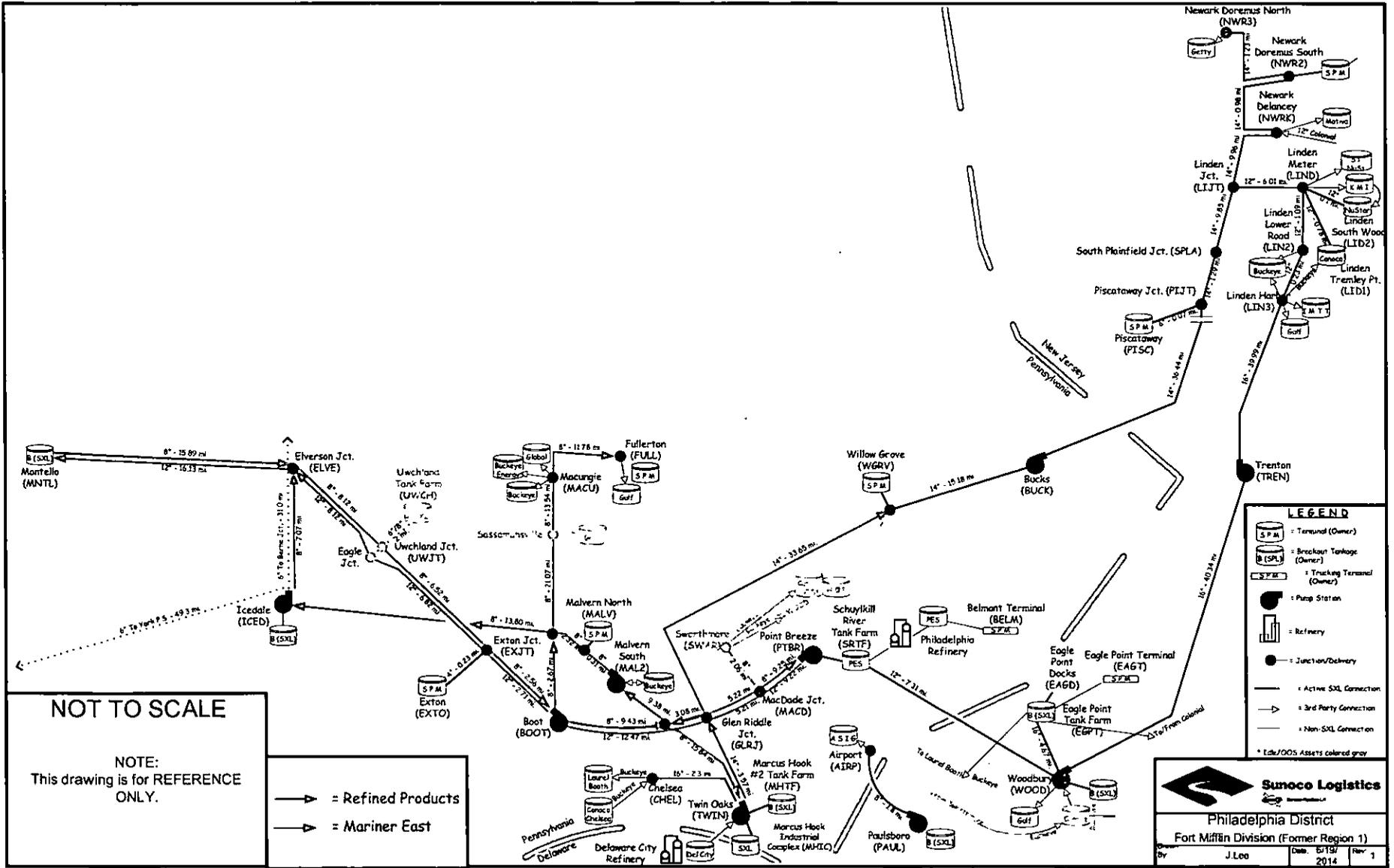
  
**Pennsylvania Pipelines**  
 PUC Tariff Routes  
 Drawn By: Joshua Lee REV. 1 - 6/17/2014

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**EXHIBIT "B"**



NOT TO SCALE

NOTE:  
This drawing is for REFERENCE ONLY.

- ➔ = Refined Products
- ➔ = Mariner East

**LEGEND**

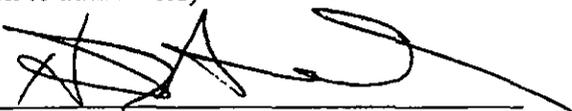
- : Terminal (Owner)
- : Bracket Tankage (Owner)
- : Trucking Terminal (Owner)
- : Pump Station
- : Refinery
- : Junction/Delivery
- : Active SXL Connection
- : 3rd Party Connection
- : Non-SXL Connection
- : Ede/IOGS Assets colored gray

**Sunoco Logistics**  
 Philadelphia District  
 Fort Mifflin Division (Former Region 1)

By: J. Leo      Date: 6/19/14      Rev: 1

## VERIFICATION

Harry J. Alexander deposes and says he is Vice President, Business Development of Sunoco Pipeline L.P. that he is duly authorized to and does make this Verification on behalf of SPLP; that the facts set forth in the foregoing Answer to the Further Preliminary Objections of the Concerned Citizens of West Goshen Township are true and correct to the best of his knowledge information and belief; and that this verification is made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



---

HARRY J. ALEXANDER

DATED: June 19, 2014

## CERTIFICATE OF SERVICE

I hereby certify that on this 19<sup>th</sup> day of June, 2014, I caused a true copy of the foregoing document to be served upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### Via First Class Mail

Honorable Elizabeth H. Barnes  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
*Also via email*

Honorable David A. Salapa  
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Reger Rizzo & Darnall  
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**Representing East & West Goshen  
Township**

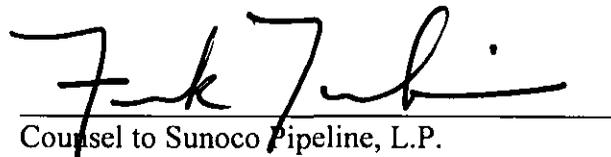
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**Representing Clean Air Council**

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Melcroft, PA 15462  
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Association**

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