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REPLY TO:  
Center City

August 20, 2019

*Via Electronic Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120


Re: Bureau of Investigation & Enforcements v.. Sunoco Pipeline L.P.,  
Docket No. C-2018-3006116 and P-2018-3006117  
**FLYNN COMPLAINANTS' OCTOBER HEARING**  
**LAY WITNESS LIST**

Dear Secretary Chiavetta:

Attached for electronic filing with the Commission is Flynn Complainants' October Hearing Lay Witness List in the above referenced case.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

  
MICHAEL S. BOMSTEIN, ESQ.

MSB:mik

cc: Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MEGHAN FLYNN	:	
ROSEMARY FULLER	:	
MICHAEL WALSH	:	
NANCY HARKINS	:	
GERALD MCMULLEN	:	DOCKET NOS. C-2018-3006116
CAROLINE HUGHES and	:	P-2-18-3006117
MELISSA HAINES	:	
Complainants	:	
v.	:	
SUNOCO PIPELINE L.P.,	:	
Respondent	:	

**COMPLAINANTS' OCTOBER HEARING WITNESS LIST**

Pursuant to the ALJ's Prehearing Order of August 2, 2019, Complainants hereby identify the following persons as witnesses for the October hearing:

1. Eric Friedman  
2 Fallbrook Lane  
Glen Mills, PA 19342

The witness will testify as to his knowledge of pipeline safety, location and siting of Mariner pipelines, concerns over adequacy of pipeline awareness plan, lack of early warning system, knowledge of adverse pipeline events and concerns over possible adverse pipeline events.

2. Gerald McMullen, Ph.D.  
200 Hillside Drive  
Exton, PA 19341

The witness will testify as to the location and siting of Mariner pipelines, as well as concerns about: NGL pipelines running through his high-consequence township; Sunoco's misrepresentations about Mariner pipelines; fragile nature of the topography in his township; the inadequacy of the pipeline awareness plan; adverse pipeline events; and, possible adverse pipeline events.

3. Caroline Hughes  
1101 Amalfi Drive  
West Chester, PA 19380

The witness will testify as to location and siting of Mariner pipelines, concerns over adequacy of pipeline awareness plan, lack of early warning system, knowledge of adverse pipeline events and concerns over possible adverse pipeline events.

4. Nancy Harkins  
1521 Woodland Road  
West Chester, PA 19382

The witness will testify as to location and siting of Mariner pipelines, concerns over adequacy of pipeline awareness plan, lack of early warning system, knowledge of adverse pipeline events and concerns over possible adverse pipeline events.

5. Michael Walsh  
12 Hadley Lane  
Glen Mills PA 19342

The witness will testify as to location and siting of Mariner pipelines, concerns over adequacy of pipeline awareness plan, lack of early warning system, knowledge of adverse pipeline events and concerns over possible adverse pipeline events.

6. Rosemary Fuller  
226 Valley Road  
Media, PA 19063

The witness will testify as to location and siting of Mariner pipelines, the misrepresentation of facts regarding the pipeline project for the purpose of obtaining permanent easement signatures, concerns over adequacy of pipeline awareness plan, integrity maintenance process, lack of early warning system, lack of a credible emergency plan, failure of Sunoco's leak detection system, knowledge of adverse pipeline events and concerns over possible adverse pipeline events, the inability to get answers to questions from regulatory agencies (DEP, PUC and PHMSA), including those submitted via FOIA and RTK requests and the lack of concern for people's safety.

7. Meghan Flynn  
212 Lungren Road  
Lenni, PA 19052

The witness will testify as to location and siting of Mariner pipelines, concerns over adequacy of pipeline awareness plan, lack of early warning system,

8. Melissa Haines  
176 Ronald Road  
Aston, PA 19014

The witness will testify as to location and siting of Mariner pipelines, concerns over adequacy of pipeline awareness plan, lack of early warning system, impact on Penn Delco School District, and concerns over possible adverse pipeline events.

9. Mrs. Margaret Egan  
Principal of Sts. Peter and Paul School  
1327 Boot Road  
West Chester, PA 19380

The witness will testify as to the nature of the population of the school, the location of Mariner pipelines relative to the school, lack of early warning system, her knowledge of emergency response plans, and problems relative to responding to an HVL emergency.

10. Christi Marshall  
Hershey's Mill Adult Community  
West Chester, PA

As a resident of Hershey's Mill, the witness will testify as to the nature of the population of the community, the limitations of her paralyzed sister and others at Hershey's Mill, the location of Mariner pipelines relative to the community, lack of early warning system, her knowledge of emergency response plans, and problems relative to responding to an HVL emergency.

11. Facility Representative  
Elwyn  
111 Elwyn Road  
Media, PA 19063

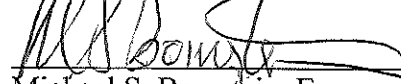
The witness will testify as to the nature of the population of the facility, the location of Mariner pipelines relative to Elwyn, her knowledge of emergency response plans, and problems relative to responding to an HVL emergency.

12. Facility Representative  
Wellington Terrace Nursing Facility  
1361 East Boot Road  
West Chester, PA 19380

The witness will testify as to the nature of the population of the facility, the location of Mariner pipelines relative to the Wellington, her knowledge

of emergency response plans, and problems relative to responding to an HVL emergency.

Respectfully submitted,



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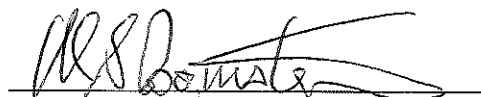
Attorney for Complainants

Dated: August 20, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the persons listed below, in accordance with the requirements of § 1.54 (relating to service by a party). This document has been filed electronically on the Commission's electronic filing system and served on the following via electronic and first-class mail:

**SEE ATTACHED LIST**

  
Michael S. Bomstein

Dated: August 20, 2019

*(PARTIES LIST UPDATED MARCH 28, 2019)*

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