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REPLY TO:
Center City

August 23, 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' *Amended* 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' AMENDED 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; the 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. Tom McDonald
646 Thorncroft Dr.
West Chester, PA 19380

The witness's mother has been a resident at Wellington for over ten years, the last two of which have been in the assisted living facility. 37 of the assisted living's 64 residents live on second floor. Most use a wheelchair or walker to ambulate. The skilled nursing section of Wellington's patient's are even more limited. In an

evacuation, the limited number of elevators would be an impediment. In the case of a leak the facility's topography (being downhill) would be a serious problem.

Respectfully submitted,



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Attorney for Complainants

Dated: August 23, 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


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