

# MANKO | GOLD | KATCHER | FOX LLP

AN ENVIRONMENTAL AND ENERGY LAW PRACTICE

Diana A. Silva  
484-430-2347  
dsilva@mankogold.com

*Admitted in PA and NJ*

December 11, 2019

via Electronic Filing

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

Re: Meghan Flynn, et al. v. Sunoco Pipeline L.P.,  
Consolidated Docket Nos. C-2018-3006116

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is Sunoco Pipeline L.P.'s Cover letter and Certificate of Service showing service of Sunoco's Response to the Flynn et al. Complainants' Second Interrogatories and Second Document Request.

Very truly yours,



Diana A. Silva  
For MANKO, GOLD, KATCHER & FOX, LLP

DAS/mrb/11842.019

Enclosure

cc: All Counsel and Pro Se Parties on attached Service List

401 CITY AVENUE, SUITE 901  
BALA CYNWYD, PA 19004  
TEL: 484-430-5700  
FAX: 484-430-5711  
WWW.MANKOGOLD.COM

A LIMITED LIABILITY PARTNERSHIP  
FORMED IN PENNSYLVANIA

*Partner responsible:  
John F. Gullace (NJ)  
Brenda H. Gotanda (HI)*



# MANKO | GOLD | KATCHER | FOX LLP

AN ENVIRONMENTAL AND ENERGY LAW PRACTICE

Diana A. Silva  
484-430-2347  
dsilva@mankogold.com

*Admitted in PA and NJ*

December 11, 2019

via Electronic and First-Class Mail

Michael S. Bomstein, Esquire  
Pinnola & Bomstein  
Suite 2126 Land Title Building  
100 South Broad Street  
Philadelphia, PA 19110

Re: Meghan Flynn, et al. v. Sunoco Pipeline L.P.,  
Consolidated Docket Nos. C-2018-3006116

Dear Michael:

Enclosed is Sunoco Pipeline L.P.'s Responses to the Flynn et al. Complainants' Second Interrogatories and Second Document Request.

Very truly yours,



Diana A. Silva  
For MANKO, GOLD, KATCHER & FOX, LLP

DAS/mrb/11842

Enclosure

cc: All Counsel and Pro Se Parties on attached Service List

401 CITY AVENUE, SUITE 901  
BALA CYNWYD, PA 19004  
TEL: 484-430-5700  
FAX: 484-430-5711  
WWW.MANKOGOLD.COM

A LIMITED LIABILITY PARTNERSHIP  
FORMED IN PENNSYLVANIA

*Partner responsible:*  
*John F. Gullace (NJ)*  
*Brenda H. Gotanda (HI)*



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the forgoing document upon the persons listed below in accordance with the requirements of § 1.54 (relating to service by a party).

**VIA ELECTRONIC MAIL**

Michael S. Bomstein, Esquire  
Pinnola & Bomstein  
Suite 2126 Land Title Building  
100 South Broad Street  
Philadelphia, PA 19110  
[mbomstein@gmail.com](mailto:mbomstein@gmail.com)

*Counsel for Flynn et al. Complainants*

Anthony D. Kanagy, Esquire  
Garrett P. Lent, Esquire  
Post & Schell PC  
17 North Second Street, 12<sup>th</sup> Floor  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)

*Counsel for Intervenor  
Range Resources – Appalachia LLC*

Erin McDowell, Esquire  
3000 Town Center Blvd.  
Canonsburg, PA 15317  
[emcdowell@rangeresources.com](mailto:emcdowell@rangeresources.com)

*Counsel for Range Resources Appalachia*

Rich Raiders, Esquire  
Raiders Law  
606 North 5<sup>th</sup> Street  
Reading, PA 19601  
[rich@raiderslaw.com](mailto:rich@raiderslaw.com)

*Counsel for  
Andover Homeowner's Association, Inc.*

Vincent M. Pompo  
Guy A. Donatelli, Esq.  
24 East Market St., Box 565  
West Chester, PA 19382-0565  
[vpompo@lambmcerlane.com](mailto:vpompo@lambmcerlane.com)  
[gdonatelli@lambmcerlane.com](mailto:gdonatelli@lambmcerlane.com)

*Counsel for Intervenors  
West Whiteland Township,  
Downingtown Area School District,  
Rose Tree Media School District*

Leah Rotenberg, Esquire  
Mays, Connard & Rotenberg LLP  
1235 Penn Avenue, Suite 202  
Wyomissing, PA 19610  
[rotenberg@mcr-attorneys.com](mailto:rotenberg@mcr-attorneys.com)

*Counsel for Intervenor  
Twin Valley School District*

Margaret A. Morris, Esquire  
Reger Rizzo & Darnall LLP  
Cira Centre, 13<sup>th</sup> Floor  
2929 Arch Street  
Philadelphia, PA 19104  
[mmorris@regerlaw.com](mailto:mmorris@regerlaw.com)

*Counsel for Intervenors  
East Goshen Township and County of Chester*

Mark L. Freed  
Joanna Waldron  
Curtin & Heefner LP  
2005 S. Easton Road, Suite 100  
Doylestown, PA 18901  
[mlf@curtinheefner.com](mailto:mlf@curtinheefner.com)  
[jaw@curtinheefner.com](mailto:jaw@curtinheefner.com)

*Counsel for Intervenor  
Uwchlan Township*

Josh Maxwell  
Mayor of Downingtown  
4 W. Lancaster Avenue  
Downingtown, PA 19335  
[jmaxwell@downingtwn.org](mailto:jmaxwell@downingtwn.org)

*Pro se Intervenor*

James C. Dalton, Esquire  
Unruh Turner Burke & Frees  
P.O. Box 515  
West Chester, PA 19381-0515  
[jdalton@utbf.com](mailto:jdalton@utbf.com)

*Counsel for West Chester Area School District,  
Chester County, Pennsylvania*

Virginia Marcille-Kerslake  
103 Shoen Road  
Exton, PA 19341  
[vkerslake@gmail.com](mailto:vkerslake@gmail.com)

*Pro Se Intervenor*

James R. Flandreau  
Paul, Flandreau & Berger, LLP  
320 W. Front Street  
Media, PA 19063  
[jflandreau@pfblaw.com](mailto:jflandreau@pfblaw.com)

*Counsel for Intervenor  
Middletown Township*

Thomas Casey  
1113 Windsor Dr.  
West Chester, PA 19380  
[Tcaseylegal@gmail.com](mailto:Tcaseylegal@gmail.com)

*Pro se Intervenor*

Patricia Sons Biswanger, Esquire  
217 North Monroe Street  
Media, PA 19063  
[patbiswanger@gmail.com](mailto:patbiswanger@gmail.com)

*Counsel for County of Delaware*

Melissa DiBernardino  
1602 Old Orchard Lane  
West Chester, PA 19380  
[lissdibernardino@gmail.com](mailto:lissdibernardino@gmail.com)

*Pro se Complainant*

Joseph Otis Minott, Esquire  
Alexander G. Bomstein, Esquire  
Ernest Logan Welde, Esquire  
Kathryn L. Urbanowicz, Esquire  
Clean Air Council  
135 South 19th Street, Suite 300  
Philadelphia, PA 19103  
[Joe\\_minott@cleanair.org](mailto:Joe_minott@cleanair.org)  
[abomstein@cleanair.org](mailto:abomstein@cleanair.org)  
[lwelde@cleanair.org](mailto:lwelde@cleanair.org)  
[kurbanowicz@cleanair.org](mailto:kurbanowicz@cleanair.org)

James J. Byrne, Esquire  
Kelly S. Sullivan, Esquire  
McNichol, Byrne & Matlawski, P.C.  
1223 N. Providence Road  
Media, PA 19063  
[jjbyrne@mbmlawoffice.com](mailto:jjbyrne@mbmlawoffice.com)  
[ksullivan@mbmlawoffice.com](mailto:ksullivan@mbmlawoffice.com)

*Counsel for Thornbury Township, Delaware  
County*

Michael P. Pierce, Esquire  
Pierce & Hughes, P.C.  
17 Veterans Square  
P.O. Box 604  
Media, PA 19063  
[Mppierce@pierceandhughes.com](mailto:Mppierce@pierceandhughes.com)

*Counsel for Edgmont Township*

Rebecca Britton  
211 Andover Drive  
Exton, PA 19341  
[rbrittonlegal@gmail.com](mailto:rbrittonlegal@gmail.com)

*Pro se Complainant*

Laura Obenski  
14 South Village Avenue  
Exton PA 19341  
[ljobenski@gmail.com](mailto:ljobenski@gmail.com)

*Pro se Complainant*

  
\_\_\_\_\_  
Diana A. Silva, Esquire

Dated: December 11, 2019