LAW OFFICES
PINNOLA & BOMSTEIN

MICHAEL S. BOMSTEIN
PETER J. PINNOLA

ELKINS PARK OFFICE
8039 OLD YORK ROAD
ELKINS PARK, PA 19027
(215) 635-3070
FAX (215) 635-3944

100 SOUTH BROAD STREET, SUITE 705
PHILADELPHIA, PA 19110
(215) 592-8383
FAX (215) 574-0699
EMAIL mbomstein@gmail.com

MT. AIRY OFFICE
7727 GERMANTOWN AVENUE, SUITE 100
PHILADELPHIA, PA 19119
(215) 248-5800
REPLY TO: Center City

Jun 30, 2021

Electronic Filing

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

Re: Flynn, et al. v. Sunoco Pipeline L.P.,
Docket Nos. C-2018-3006116, P-2018-3006117
DiBernardino, Docket No. C-2018-3005025 (consolidated)
Britton, Docket No. C-2019-3006898 (consolidated)
Obenski, Docket No. C-2019-3006905 (consolidated)
Andover, Docket No. C-2018-3003605

Flynn Complainants' Reply to Sunoco's Exceptions

Dear Secretary Chiavetta:

Pursuant to Judge Barnes' Order, please be advised that on this date I have served a copy of Flynn Complainants' Reply to Sunoco's Exceptions upon counsel for Sunoco.

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

Very truly yours,

/s/ Michael S. Bomstein
MICHAEL S. BOMSTEIN

cc: Per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Meghan Flynn	:	C-2018-3006116
Rosemary Fuller	:	P-2018-3006117
Michael Walsh	:	
Nancy Harkins	:	
Gerald McMullen	:	
Caroline Hughes	:	
Melissa Haines	:	
Andover Homeowners Association	:	C-2018-3003605
Melissa DiBernardino	:	C-2018-3005025
Rebecca Britton	:	C-2018-3006898
Laura Obenski	:	C-2018-3006905
	:	
v.	:	
	:	
Sunoco Pipeline L.P.	:	

FLYNN COMPLAINANTS' REPLY TO EXCEPTIONS OF SUNOCO PIPELINE, L.P.

Flynn Complainants hereby submit this Reply to Exceptions of Sunoco Pipeline to the April 9, 2021 Initial Decision pursuant to the correspondence of Secretary Rosemary Chiavetta to all parties dated April 23, 2021, and in accordance with 52 Pa. Code §5.535.

/s/ Michael S. Bomstein
Michael S. Bomstein, Esq.
Pinnola & Bomstein
PA ID No. 21328
Email: mbomstein@gmail.com
Suite 705 Land Title Building
100 South Broad Street
Philadelphia, PA 19110
Tel.: (215) 592-8383

Dated: June 30, 2021

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Meghan Flynn	:	C-2018-3006116
Rosemary Fuller	:	P-2018-3006117
Michael Walsh	:	
Nancy Harkins	:	
Gerald McMullen	:	
Caroline Hughes	:	
Melissa Haines	:	
Andover Homeowners Association	:	C-2018-3003605
Melissa DiBernardino	:	C-2018-3005025
Rebecca Britton	:	C-2018-3006898
Laura Obenski	:	C-2018-3006905
	:	
v.	:	
	:	
Sunoco Pipeline L.P.	:	

COMPLAINANTS' REPLY TO SUNOCO'S EXCEPTIONS 1, 2 AND 3

I. Introduction

Sunoco's disinformation campaign began in 2014 when the company changed counsel. In one month, the company's position was that the Mariner East pipeline system was *interstate in* character and not subject to PUC jurisdiction. The next month, the company's position was that the system was *intrastate,* thereby making it subject to PUC jurisdiction and statewide eminent domain takings.

When it has suited Sunoco, the company insisted in filings and in open court that pipeline siting decisions were the sole province of the PUC. When it has not suited Sunoco, the company has argued that the PUC does not have the authority to make pipeline siting decisions.

Sunoco now has filed eight Exceptions to the Initial Decision ("ID"). Below, Flynn Complainants address the first three.

SPLP Exception 1. The ID erred in paragraphs 22-26 of the Order by directing SPLP to conduct a survey of depth of cover and separation distance between other underground pipelines/structures for the ME-1 and the 12-inch pipelines because none of the Complainants or aligned Intervenors raised these issues in their Complaints or sought this relief.

Sunoco correctly notes that the Second Amended Complaint ("the Complaint") did not expressly allege that Sunoco violated 49 CFR 195.210, 248 and 250. Beyond that, however, Sunoco errs in concluding that the ID's relief goes beyond that which is allowed. The Complaint and the subsequent evidence raised issues, to which Sunoco did not object, that laid the groundwork for the ID's relief. A fuller examination of the Complaint, the record, and the law makes this abundantly clear.

(1) <u>The Second Amended Complaint</u>

The Complaint alleges in ¶¶ 4 and 5 that the Commission has jurisdiction over claims that "the service or facilities of a public utility are unreasonable, unsafe, inadequate, insufficient… or otherwise in violation of this part." ¶ 7 invokes 52 Pa. Code § 59.33, which incorporates, *inter alia*, 49 CFR Part 195.

¶ 12 alleges that Complainants believe they are at risk from the Mariner East pipelines' operation. ¶ 13 avers that the lack of a proper pipeline integrity program puts them at risk. ¶¶ 26-30 express concern for leaks from the pipelines.

Count II in ¶ 124 invokes Section 1501 of the Public Utility Code, which provides that "every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities…" Counts II and III of the Complaint in ¶¶ 124 and 138 both also invoke 52 Pa. Code § 59.33(b), which requires public utilities to use reasonable efforts to protect the public from danger and to use reasonable care to reduce hazards posed by reason of their equipment and facilities. Finally, ¶ 143 alleges that Sunoco has failed to use every reasonable effort to protect

the public from danger and take reasonable care to reduce hazards posed by its equipment and facilities.

It cannot reasonably be asserted, therefore, that Complainants in their pleading failed to allege that Sunoco in its operation of the Mariner East pipelines did not use every reasonable effort to protect the public from danger or that Sunoco did not take reasonable care to reduce hazards posed by its equipment and facilities. Further, the Complaint in multiple instances invokes the authority of the Commission under 49 CFR Part 195 and under Sections 1501 and 1505 of the Public Utility Code.

(2) <u>The Facts</u>

In making its argument that Complainants failed to raise issues relative to depth of cover and spacing of pipelines, Sunoco simply chose to ignore the judge's factual findings. The company also ignored the record itself.

Witness Gerald McMullen gave evidence that four separate Sunoco pipelines are within twenty-five feet of his residence. (McMullen 4, N.T. 951). He also identified Ex. McMullen 15, a photograph of two exposed Sunoco pipes. (N.T. 965). He explained what they were and why he was concerned. (N.T. 965 – 967). Sunoco raised no objections to that testimony. Further, when it came time to offer the exhibit into evidence, Sunoco did not object to McMullen 4 (N.T. 976) or McMullen 15. (N.T. 977). In addition, regarding Mariner East 1, McMullen said he believed it was shallow. (N.T. 979).

Bibianna Dussling gave testimony that between the Higgins home and the White home, the distance is only 30 feet. At least three pipelines are found within that space and Sunoco's answers to interrogatories confirm that they are as close as 5.1 feet to the Higgins home and two of them are not even 10 feet apart. (N.T. 1181-1183).

Coupled with the admissions of Sunoco witnesses Gordon and Zurcher, Complainants made out a case that there were pipelines within 50 feet of homes; some of them were exposed; and some were believed to be shallow. It was reasonable, therefore, for the ALJ to conclude that complainants had made out a prima facie case that the depth and separation of existing Mariner East pipelines were questionable and Sunoco failed to give any evidence whatsoever to rebut that evidence.

ALJ Barnes also succinctly summarized evidence of the Lenni Road Aqua incident: "Further, on May 21, 2018, at Lenni Road, an excavator for Aqua water utility using power equipment scraped the coating off a non-operating Mariner East 2 pipeline at approximately 6 feet depth because the excavator had been informed via a PA One Call that the depth of the pipeline was nine feet deep where the excavator planned to dig. (N.T. 1150; Exhibit Dussling-1)."

Sunoco asserts these issues are not part of the case. The evidence provided by Dussling, McMullen, Gordon and Zurcher, admitted without challenge, made these issues part of the case.

(3) Due Process Claims

All of the above-cited evidence was given in the fall of 2019. Sunoco did not put on its own case until the fall of 2020. It chose, however, not to bother to rebut the evidence given by McMullen, Dussling, Gordon, and Zurcher.

Barasch v. Pa. PUC, 521 A.2d 482, 496 (Pa. Cmwlth. Ct. 1987) is cited by Sunoco for the general requirements of due process, but the Commonwealth Court denied the due process claim in that case, writing: "From the time of the original show cause order the potential imposition of a cost-containment plan was manifest to all the litigants. Testimony was adduced

on this subject by virtually all the parties, and an examination of the record demonstrates that more than an adequate opportunity for litigation was provided."

Sunoco cites *Hess v. Pa. PUC*, 107 A.3d 246, 266 (Pa. Cmwlth. Ct. 2014) for general principles but, once again, leaves out the specifics. The Commonwealth Court in *Hess* wrote: "Among the requirements of due process are notice and an opportunity to be heard on the issues, to be apprised of the evidence submitted, to cross-examine witnesses, to inspect documents, and to offer evidence in explanation or rebuttal."

Applying the principles of *Barasch* and *Hess, supra*, extensive evidence was given in fall, 2019 with no objections as to relevance. Sunoco was directed during discovery to supply, and did supply over its objections, information regarding both the depth and spacing of Mariner East pipes. Sunoco had a year to review that evidence and to meet that evidence but elected not to do so. Sunoco had notice and an opportunity to be heard, to cross-examine witnesses, and to present its own.

In *Reynolds v. Thomas Jefferson University Hosp.*, 676 A. 2d 1205, 1209-1210 (Pa. Super. 1996), plaintiff at trial was allowed to introduce evidence that was *at variance* from the pleadings. The Superior Court found that was permissible and went on to rule as follows:

> The modern rules of pleading and practice are relatively liberal.... Consequently, the impact of variance may be diminished by the preference for a liberal if not informal evaluation of pleadings emphasizing the determination of cases based upon their merits rather than based on mere technicalities, which policy, for example, may allow a party to cure a variance by offering, during or after trial, to amend the pleadings to conform to the proof.
>
> General allegations of a pleading, which are not objected to because of their generality, may have the effect of extending the available scope of a party's proof, such that the proof would not constitute a variance, beyond that which the party might have been permitted to give under a more specific statement.

Due process is not implicated under the common circumstances recounted in the *Reynolds, supra*, decision. Notably, Sunoco has not cited to any case or rule that says that the ALJ can't rule on an issue that's been raised, where evidence has been presented. Further, Sunoco does not say what its evidence would be. A party cannot show that it has been harmed by a lack of an opportunity to present evidence if it cannot show that it would have had any evidence to present. Having to disclose information already in the company's possession or that should be in the company's possession is not the kind of injury that is ordinarily the concern of due process cases.

The general allegations in Complainants' Second Amended Complaint, together with extensive evidence given in the fall of 2019, all support the ALJ's decision to evaluate the evidence as to pipe depth and pipe spacing and make a ruling based upon that evidence. The judge, therefore, did not err in ¶¶ 22-26 of the Order and the first Exception must be deemed unfounded.

SPLP Exception 2. The ID erred in holding that Complainants and aligned Intervenors established a prima facie case that SPLP violated 49 C.F.R. §§ 195.210(b) and 195.248

49 C.F.R. § 195.210(b) states that "No pipeline may be located within 50 feet (15 meters) of any private dwelling, or any industrial building or place of public assembly in which persons work, congregate, or assemble, unless it is provided with at least 12 inches (305 millimeters) of cover in addition to that prescribed in § 195.248." Where 12 inches is impracticable, the clearance may be reduced if adequate provisions are made for corrosion control. 49 C.F.R. § 195.250.

§ 195.248(a) provides that, "Unless specifically exempted in this subpart, all pipe must be buried so that it is below the level of cultivation. Except as provided in paragraph (b) of this

section, the pipe must be installed so that the cover between the top of the pipe and the ground level, road bed, river bottom, or underwater natural bottom (as determined by recognized and generally accepted practices), as applicable, complies with the following table…"

Contrary to Sunoco's contention, the words "new construction" appear nowhere in the above two provisions and no basis is offered for the company's claim that these two sections apply only to new construction. Tellingly, the company does not even bother to quote the actual regulations. Moreover, Sunoco ignores other regulatory provisions that explicitly say the opposite of what Sunoco asserts.

§ 195.200 provides that, "This subpart prescribes minimum requirements for constructing new pipeline systems with steel pipe, **and for relocating, replacing, or otherwise changing existing pipeline systems that are constructed with steel pipe.** However, this subpart does not apply to the movement of pipe covered by § 195.424." (Emphasis added).

§ 195.200 states plainly that this subpart prescribes minimum requirements for "otherwise changing existing pipeline systems that are constructed with steel pipe." Sunoco does not assert that Mariner East 1 and the 12-inch pipeline are not constructed with steel pipe. Sunoco does not assert that the 8-inch and 12-inch lines are existing pipeline systems. Indeed, the very lynchpin of the company's claims in 2014 was that the new construction was an expansion of existing service. The words "otherwise changing" are in distinction to the term "constructing," making it obvious to anyone that the chapter is not merely addressing new construction. Why Sunoco believes that the ALJ would not realize this is simply mystifying.

Sunoco does not even bother to explain or mention its flagrant disregard of § 195.200. This is consistent with Sunoco's historic *modus operandi* of inventing standards that suit its claims and disregarding standards that do not suit its claims. A recent example is found in the

record with the contorted, dishonest, and contradictory testimony of professional witness John Zurcher. As noted in Complainants' proposed Findings of Fact, Mr. Zurcher ignored the plain language of API § 1162 and of § 195.440 in order to justify the patently deficient content of Sunoco's public awareness flyers.[1] Exception No. 2 is just more of the same.

Complainants also note that Sunoco's position throughout this proceeding is that compliance with minimum federal requirements is sufficient to demonstrate safety. While Complainants do not agree, it would seem to follow at the very least that failure to comply with these minimum requirements proves the company's practices regarding spacing and depth of cover are unsafe.

Having evaluated all of the relevant evidence, the ID reached the following conclusions:

> As I find a violation of Part 195.243 more likely than not occurred with the exposed pipeline by Whiteland West Apartments, West Whiteland, Chester County and with other shallow buried ME1 and 12-inch workaround pipeline in Delaware and Chester Counties, there is a violation of 66 Pa. C.S. § 1501. SPLP is not applying its SOP Procedure No. HLI24 (management of depth of cover and evaluation to ME1 and 12-inch) and the operator should be as long as they are transporting HVLs on those two pipelines. The SOP Procedure No. HLI.24 appears to be technically sound and designed for compliance with 49 C.F.R. 195.248 and 195.401; however, there is substantial evidence to support a finding that this SOP is not being applied to the ME1 and the 12-inch pipelines,

---

[1] Zurcher testified that the fact that hazard may result in injury is not anticipated in the regulations. (Zurcher, N.T. 10/14/20 at 4237, ll. 3-25). API RG 1162 states, however, that "[o]perators should provide a very broad overview of potential hazards, their potential consequences..." (N.T. 4240, ll. 4-9). Mr. Zurcher says that if the API standard is over and above what the regulations require, the operator doesn't have to follow that additional direction. (N.T. 4240, ll. 8-10). Thus, Sunoco doesn't have an obligation to notify the affected public of the potential consequences of burns or fatalities. (N.T. 4240, ll. 19-223). He claims the regulations preempt the standards, but he doesn't know where in the regulations it says that. (N.T. 4241, ll. 10-24). Despite his testimony, 49 CFR § 195.3 incorporates API RP 1162 by reference. Moreover, 49 CFR § 195.440(b) provides that, "[t]he operator's program must follow the general program recommendations of API RG 1162." John Zurcher has spent 43 years involved in public awareness (N.T. 4234, ll. 12-13) and he was involved in the original publication of API 1162 (N.T. 4233, ll. 21-22). His testimony, that the fact that hazard may result in injury is not in the regulations; that Sunoco need not notify the affected public of potential consequences of HVL pipeline leaks; and that the regulations preempt the standards is a tapestry of obviously barefaced lies.

> which are currently operating. Accordingly, SPLP will be directed to pay a civil penalty and to conduct a depth of cover and distance between other underground pipelines/structures survey regarding ME1 and the 12-inch workaround pipelines and file a compliance filing certifying whether ME 1 and the 12-inch pipeline are in compliance with Part 195.210, 195.243 and 195.250 within Chester and Delaware Counties. SPLP's Pipe must be buried so that it is below the level of cultivation and so the cover between top of pipe and ground level, roadbed, river bottom or underwater natural bottom complies with the certain minimum requirements. Pipes must be at least 12 inches apart unless SPLP can show it is providing adequate corrosion control in these areas where the pipes are less than 12 inches apart. If SPLP cannot certify compliance, then an explanation should be given offering justification and a corrective action plan to mitigate shallow or exposed pipe and to provide adequate corrosion control for the bureau's approval. As long as the company is timely remediating lack of cover and distance between pipelines, it is allowed to continue to operate the 8-inch and 12-inch pipelines for the transport of HVLs.

(Interim Decision at 97-98).

Sunoco notably fails to articulate any standard by which to determine whether or not an exception such as Exception 2 should be granted. Judge Barnes' analysis, however, is thorough, detailed and based upon the record. Her conclusion that Complainants made out a *prima facie* case is reasonable. Accordingly, Sunoco's exception should be denied.

SPLP Exception 3. The ID erred in holding that Complainants and aligned Intervenors established a *prima facie* case that SPLP violated 49 C.F.R. § 195.250.

Pursuing its now-familiar Procrustean practice of cutting out the parts of regulations it does not like, Sunoco parses the ID's spacing analysis to its liking by ignoring the words "where 12 inches (305 millimeters) of clearance is impracticable."

§ 195.250 provides as follows:

> **§ 195.250 Clearance between pipe and underground structures.**
> Any pipe installed underground must have at least 12 inches (305 millimeters) of clearance between the outside of the pipe and the extremity of any other underground structure, except that for drainage tile the minimum clearance may

> be less than 12 inches (305 millimeters) but not less than 2 inches (51 millimeters). However, where 12 inches (305 millimeters) of clearance is impracticable, the clearance may be reduced if adequate provisions are made for corrosion control.

Clearly, clearance between a pipe and an underground structure has to be at least 12 inches. If the public utility wishes to be relieved of that burden, it has the burden of showing such clearance is impracticable. In that case the company must also demonstrate adequate provision is made for corrosion control. Thus, in order to avoid meeting this minimum requirement the utility must show BOTH that clearance is impracticable AND that adequate corrosion control has been provided.

Latching onto a few arithmetic errors, Sunoco more or less asserts that there is no evidence in the case of inadequate spacing. This is simply incorrect.

First, Complainants furnished evidence that some of the new Mariner East lines consist of two pipelines encased within a larger pipe. The two pipes are admittedly less than 12 inches apart.

While Dr. Ariaratnam testified that this is a safe engineering practice, that explanation really was beside the point. § 195.250 does not contain an exception for Dr Ariaratnam's view of safe practice. With two such pipes less than 12 inches apart, the burden shifted to Sunoco to demonstrate that widening the spacing was impracticable. Sunoco did not even bother to try.

Further, it has been Sunoco's contention throughout this proceeding (as noted already above) that the metric by which "safety" is measured is compliance with federal regulations. The company's position with respect to two pipes contained within a larger pipe, however, is that spacing of less than 12 inches is safe even if it may not comport with § 195.250.

In short, the bundling of two new Mariner East pipes less than 12 inches apart is obviously not safe and Sunoco's failure to justify it on grounds of impracticability supports an ID finding that the spacing of Mariner East pipelines violates federal regulations.

In addition to the above, key Sunoco witness Matthew Gordon has testified on multiple occasions that safe practice requires spacing pipes at least 10 feet apart; that is ten times the federal requirement contained in § 195.250. This was observed by the ALJ in the ID where she writes: "Mr. Gordon testified in the *Dinniman* proceeding that the standard practice of a buffer of 10 feet between ME1, ME2 and ME2X of 10-20 feet was observed in his opinion **"it's safe at 10 feet."** *Dinniman v. SPLP;* N.T. 434-435." (ID at 97)(Emphasis added).

"Safe at 10 feet" obviously suggests that less than 10 feet is not safe. Once again, Sunoco assesses safety by its own engineering standards, not by federal regulations.

For the reasons set forth above, the ID did not error in finding Sunoco in violation of § 195.250.

Respectfully submitted,

/s/ Michael S. Bomstein
Michael S. Bomstein, Esq.
Pinnola & Bomstein
PA ID No. 21328
Email: mbomstein@gmail.com
Suite 705 Land Title Building
100 South Broad Street
Philadelphia, PA 19110
Tel.: (215) 592-8383

Dated: June 30, 2021

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Meghan Flynn	:	C-2018-3006116
Rosemary Fuller	:	P-2018-3006117
Michael Walsh	:	
Nancy Harkins	:	
Gerald McMullen	:	
Caroline Hughes	:	
Melissa Haines	:	
Andover Homeowners Association	:	C-2018-3003605
Melissa DiBernardino	:	C-2018-3005025
Rebecca Britton	:	C-2018-3006898
Laura Obenski	:	C-2018-3006905
	:	
v.	:	
	:	
Sunoco Pipeline L.P.	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the within Reply to Sunoco's Exceptions upon the persons listed below as per the requirements of § 1.54 (relating to service by a party).

See attached service list.

/s/ Michael S. Bomstein
Michael S. Bomstein

Dated: June 30, 2021

SERVICE LIST

THomas J. Sniscak, Esquire
Kevin J. McKeon, Esquire
Whitney E. Snyder, Esquire
Hawke, McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
kjmckeon@hmslegal.com
wesnyder@hmslegal.com
Attorneys for Respondent SPLP

Michael P. Pierce, Esquire
Pierce & Hughes
17 Veterans Square
Media, PA 19063
mppierce@pierceandhughes.com
Attorney for Edgmont Twp

James C. Dalton, Esquire
Unruh, Turner, Burke & Frees
P.O. Box 515
West Chester, PA 19381-0516
jdalton@utbf.com
Attorney for West Chester Area

Joseph Otis Minott, Esquire
Alexander G. Bomstein, Esquire
Ernest Logan Welde, Esquire
Kathryn Urbanowicz, Esquire
Clean Air Council
135 South 19th St, Suite 300
Philadelphia, PA 19103
Joe_Minott@cleanair.org
abomstein@cleanair.org
lwelde@cleanair.org
kurbanowicz@cleanair.org

Robert Fox, Esquire
Neil Witkes, Esquire
Diana A. Silva, Esquire
Manko, Gold, Katcher & Fox
401 City Avenue, Suite 901
Bala Cynwyd, PA 19004
rfox@mankogold.com
nwitkes@mankogold.com
dsilva@mankogold.com
Attorneys for Respondent SPLP

Rich Raiders, Esquire
Raiders Law
321 East Main Street
Annville, PA 17003
rich@raiderslaw.com
Attorney for Andover Homeowners

James J. Byrne, Esquire
McNichol, Byrne & Matlawski
1223 North Providence Road
Media, PA 19063
jjbyrne@mbmlawoffice.com
Attorney for Thornbury Twp

Erin McDowell, Esquire
3000 Town Center Blvd
Canonsburg, PA 15317
emcdowell@rangeresources.com
Attorney for Range Resources

Guy Donatelli, Esquire
Vincent M. Pompo, Esquire
Lamb McErlane PC
24 East Market Street
West Chester, PA 19382-0565
gdonatelli@lambmcerlane.com
vpompo@lambmcerlane.com
abaumler@lambmcerlane.com
Attorneys for West Whiteland, Downingtown SD, Rose Tree Media Sch Dist, Sen Killion

Anthony D. Kanagy, Esquire
Garrett P. Lent, Esquire
Post & Schell PC
17 North Second St 12th Floor
Harrisburg, PA 17101-1601 a
akanagy@postschell.com
glent@postschell.com
Attorney for Range Resources

James R. Flandreau, Esquire
Paul, Flandreau & Berger, LLP
320 West Front Street
Media, PA 19063
jflandreau@pfblaw.com
Attorney for Middletown SD

Leah Rotenberg, Esquire
Mays Connrad & Rotenberg
1235 Penn Avenue, Suite 202
Wyomissing, PA 19610
rotenberg@mcr-attorneys.com
Attorney for Twin Valley SD

Mark L. Freed, Esquire
Joanna A. Waldron, Esquire
Curtin & Heefner, LLP
2005 S Easton Road, Ste 100
Doylestown, PA 18901
mlf@curtinheefner.com
jaw@curtinheefner.com
Attorney for Uwchlan Twp

PRO SE INTERVENORS:
Thomas Casey, Esquire
1113 Windsor Drive
West Chester, PA 19380
tcaseylegal@gmail.com

Melissa DiBernardino
1602 Old Orchard Lane
West Chester, PA 19380
lissdibernardino@gmail.com

Virginia Marcielle-Kerslake
103 Shoen Road
Exton, PA 19341
vkerslake@gmail.com

Laura Obenski
14 South Village Avenue
Exton, PA 19341
ljobenski@gmail.com

Josh Maxwell
4 West Lancaster Avenue
Downingtown, PA 19335
jmaxwell@downingtown.org

Rebecca Britton
211 Andover Drive
Canonsburg, PA 15317
rbrittonlegal@gmail.com