

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Monroe Energy, LLC,	:	
Lucknow-Highspire Terminals, LLC,	:	C-2025-3053018
Sheetz, Inc. and PBF Holding Company LLC	:	
	:	
v.	:	
	:	
Laurel Pipe Line Company, L.P.	:	

**ORDER ON RESPONDENT’S PRELIMINARY OBJECTIONS**

On January 21, 2025, Monroe Energy, LLC (Monroe), Lucknow Highspire Terminals, LLC (LHT), Sheetz, Inc. (Sheetz), and PBF Holding Company LLC (PBF) (collectively Complainants) filed a Formal Complaint (Complaint) against Laurel Pipe Line Company, L.P. (Laurel or Respondent) before the Pennsylvania Public Utility Commission (Commission) alleging that Laurel is: 1) providing the Complainants with unreasonable service in violation of 66 Pa.C.S. § 1501 and its Commission-approved tariff; and 2) circumventing Commission jurisdiction in violation of 66 Pa.C.S. §§ 1102 and 1302.

As relief, the Complainants request that the Commission find that Laurel's proposed bi-directional service on the 720 pipeline segment violates (i) Laurel’s existing Certificate of Public Convenience (CPC) and 66 Pa.C.S. § 1501, which requires jurisdictional public utilities like Laurel to provide service that is reasonably continuous and without unreasonable interruptions or delay, (ii) 66 Pa.C.S. §§ 1302 and 1303, which require public utilities like Laurel to maintain, file and adhere to tariffs that reflect service offerings and rules associated with service and are modified pursuant to the tariff review process when service is changed; and (iii) Chapter 11 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 101 *et seq.* (the Code) because Laurel must make the appropriate filings with and obtain the approval of this Commission to implement bi-directional transportation on the 720 pipeline segment because such proposal constitutes a partial abandonment of Laurel's existing east-to-west tariffed

intrastate petroleum products transportation service between Sinking Spring and Eldorado, Pennsylvania.

On January 23, 2025, Todd S. Stewart, Esq. filed a Motion for Admission *Pro Hac Vice* of Randall S. Rich, Esq. to appear on behalf of PBF.

On February 11, 2025, Laurel filed an Answer and New Matter to the Complaint as well as Preliminary Objections thereto. In its Preliminary Objections, Laurel seeks to dismiss the Complaint because the Commission lacks jurisdiction to grant the relief requested, and because the Complainants fail to state a claim against Laurel. More specifically, Laurel's Preliminary Objections argue that: 1) the Commission lacks certificate and tariff jurisdiction over the initiation of interstate service that does not involve the abandonment of intrastate service; and 2) the Complaint fails to state a claim against Laurel regarding the bidirectional service extension; 3) Complainants have failed to state a claim that any diminution or alteration of westbound intrastate petroleum products transportation service due to the bidirectional service extension is an abandonment of service under 66 Pa.C.S. § 1102(a)(2); 4) Complainants have failed to state a claim that the bidirectional service extension is inconsistent with Laurel's existing intrastate tariff.

By letter dated February 12, 2025, counsel for Laurel indicated that the Respondent did not object to the Motion for Admission *Pro Hac Vice* of Richard S. Randall, Esq.

On February 12, 2025, Garrent P. Lent Esq. filed a Motion for Admission *Pro Hac Vice* of o Christopher J. Barr, Esq.

On February 21, 2025, Complainants filed their Response to the Preliminary Objections.

On March 3, 2025, Complainants filed their Answer to New Matter.

By Motion Judge Assignment Notice dated March 12, 2025, the matter was assigned to me.

Respondent's Preliminary Objections are now ready for ruling.

### DISCUSSION

Commission regulations permit the filing of preliminary objections. 52 Pa.Code §§ 5.101(a)(1)-(7). Preliminary objection practice before the Commission is similar to Pennsylvania civil practice respecting preliminary objections. *Equitable Small Transportation Intervenors v. Equitable Gas Company*, 1994 Pa. PUC LEXIS 69, Docket No. C-00935435 (July 18, 1994).

Commission regulations provide:

**§ 5.101. Preliminary objections.**

(a) *Grounds.* Preliminary objections are available to parties and may be filed in response to a pleading except motions and prior preliminary objections. Preliminary objections must be accompanied by a notice to plead, must state specifically the legal and factual grounds relied upon and be limited to the following:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

52 Pa.Code § 5.101.

In deciding preliminary objections, the Commission must determine whether, based on well-pleaded factual averments of the Complainant, recovery or relief is possible. *Dep't of Auditor General, et al v. SERS, et al.*, 836 A.2d 1053, 1064 (Pa.Cmwlth. 2003); *P.J.S. v. Pa. State Ethics Comm'n*, 669 A.2d 1105 (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). All of the non-moving party's averments in the complaint must be viewed as true for purposes of deciding the preliminary objections, and only those facts specifically admitted may be considered against the non-moving party. *Ridge v. State Employees' Retirement Bd.*, 690 A.2d 1312 (Pa.Cmwlth. 1997).

A preliminary objection can be granted only if recovery or relief is not possible after all of the Complainant's averments in the complaint are viewed as true for purposes of deciding the preliminary objection, using only those facts specifically admitted.

**PRELIMINARY OBJECTION # 1 – The Commission Lacks Certificate And Tariff Jurisdiction Over An Initiation Of Interstate Service That Does Not Involve The Abandonment of Intrastate Service.**

In its Preliminary Objections, Laurel argues that similar to the initial bidirectional service provided over Line 718 pursuant to the Settlement Agreement<sup>1</sup>, the Bidirectional Service Extension currently proposed by Laurel over Line 720 does not involve or require the abandonment of intrastate petroleum products transportation service subject to the Commission's certificate and/or tariff jurisdiction. Preliminary Objections ¶27. Laurel maintains that the Bidirectional Service Extension does not abandon intrastate service, is consistent with the 2018

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<sup>1</sup> Docket No. C-2018-3003365.

Recommended Decision<sup>2</sup> and the 2018 Final Order<sup>3</sup> and is outside the scope of the Commission's jurisdiction under Section 104 of the Code. 66 Pa.C.S. § 104. According to Laurel, the Bidirectional Service Extension expressly contemplates maintaining existing westbound intrastate service and does not otherwise contemplate alterations or revisions to Laurel's certificate of public convenience or Laurel's current, Commission-approved Tariff – Pa. P.U.C. Nos. 81 and 83. Preliminary Objections ¶¶ 29-30.

The Complainants disagree with Laurel's interpretations of the Commission's prior orders. According to them, the Commission's previous holding does not mean that an alteration of service through less than permanent flow reversal does not constitute abandonment. They explain that their Complaint does not allege that Laurel's proposed bi-directional service is a permanent reversal of east-to-west flow, only that expanding bi-directional service would sufficiently diminish flows to constitute an abandonment or otherwise necessitate Commission approval. Response to Preliminary Objections ¶17.

It is undisputed that the Commission lacks jurisdiction to regulate interstate pipeline service. 66 Pa. C.S. § 104. It is equally undisputed that the Commission retains jurisdiction over intrastate pipeline service and requires a public utility to obtain a certificate of public convenience before abandoning or surrendering any service in whole or in part. 66 Pa. C.S. §1102(a)(2). Similarly, it is within the Commission's jurisdiction to ensure that regulated public utilities offering service in the Commonwealth of Pennsylvania are complying with the terms of their CPCs and Commission-approved tariffs, as well as the provisions of the Commission's statute, regulations and orders.

In view of the above, I find that whether or not Respondent's Bi-Directional Extension interferes with the east-to-west flow to a degree that constitutes abandonment of

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<sup>2</sup> *Application of Laurel Pipe Line Company, L.P.*, Docket Nos. A-2016-2575829 and G-2017-2587567 (Recommended Decision dated March 23, 2018) (2018 Recommended Decision).

<sup>3</sup> *Application of Laurel Pipe Line Company, L.P.*, Docket Nos. A-2016-2575829 and G-2017-2587567 (Opinion and Order entered July 12, 2018) (2018 Final Order).

service, or violates Laurel's current tariff or a Commission statute, regulation or order, represents questions of fact which may not be disposed of through preliminary objections. As explained *supra*, for the purposes of deciding the Preliminary Objection #1, Complainants' averments must be viewed as true, and any doubt must be resolved in favor of the Complainants by refusing to sustain the Preliminary Objection. *Ridge v. State Employees' Retirement Board*, 690 A.2d 1312 (Pa. Cmwlth. 1997) 1997 Pa. Commw. LEXIS 148; *Dept. of Auditor General, et al. v. State Employees' Retirement System, et al.*, 836 A.2d 1053, 1064 (Pa. Cmwlth. 2003) (citing, *Boyd v. Ward*, 802 A.2d 705 (Pa. Cmwlth. 2002)). Consequently, Respondent's Preliminary Objection # 1 is overruled.

**PRELIMINARY OBJECTION # 2 - The Complaint Fails To State A Claim Against Laurel Regarding The Bidirectional Service Extension.**

In its Preliminary Objection #2, the Respondent seeks the dismissal of the Complaint for failure to state a claim regarding the extension of bi-directional service, for which the requested relief can be granted. Respondent supports this Preliminary Objection by arguing that Complainants' claims regarding the extension of bidirectional service are not ripe as Laurel does not currently provide bidirectional service in the section between Eldorado and Sinking Spring, PA. Preliminary Objections, ¶¶ 43-46.

According to Laurel, no "act or thing done or omitted to be done" amounting to an alleged violation of the Code has actually occurred. Preliminary Objections, ¶ 47. Consequently, the Respondent argues that "no case or controversy exists at this time" with respect to the provision of bidirectional service on Laurel's pipeline system. *Id.*, citing *Hovis v. National Fuel Gas Distribution Corporation*, (Hovis) Docket No. C-2008-2035033, 2008 Pa. PUC 899, at 6 (Initial Decision dated Nov. 10, 2008), *adopted without modification* Docket No. C-2008-2035033 (Order entered Feb. 23, 2009).

In Laurel's view, the Complaint seeks to prevent alleged harms related to a future event that "it speculates will happen in the future" and, therefore, is not properly before the Commission at this time. Preliminary Objections, ¶ 48, citing *Mid-Atlantic Power Supply Assoc.*

*v. PECO Energy Company, (MAPSA)* Docket Nos. P-00981615, et al., 1999 Pa. PUC Lexis 23 (Recommended Decision dated Jan. 11, 1999), (Opinion and Order entered May 19, 1999) 1999 Pa. PUC LEXIS 30. As for the remedy available to the Complainants, Laurel suggests that they file a formal complaint after Laurel's Bidirectional Service Extension is implemented and an actual factual dispute regarding its impact exists. Preliminary Objections, ¶ 53.

In their Response to Preliminary Objection #2, the Complainants argued that the Amended Complaint does not address a hypothetical situation or require the rendering of an advisory opinion for several reasons. They point to Buckeye's filing of the 2024 Petition for Declaratory Order (PDO) at FERC Docket No. OR25-6-000 as the commencement of its Phase 3 project, and to the actual impacts of Laurel's recent change to the schedule for shippers to reformulate the Reid Vapor Pressure for gasoline shipped on the pipeline several weeks earlier than normal, as caused directly by Buckeye's preparations to expand capacity for west-to-east service. Complainants' Response to Preliminary Objections, ¶¶ 24-26.

A case must be ripe for adjudication before it can be heard. *Woods Schools v. Department of Education*, 100 Pa. Commonwealth Ct. 375, 514 A.2d 686 (1986); *Sgarlat v. Board of Adjustment of Kingston Borough*, 407 Pa. 324, 180 A.2d 769 (1962). There must be actual, palpable injury before a case will be ripe for adjudication. *Concerned Taxpayers v. Commonwealth of Pennsylvania*, 33 Pa. Commonwealth Ct. 518, 382 A.2d 490 (1978). Hence, hypothetical or abstract questions are precluded. *Raezer v. Raezer*, 428 Pa. 163, 236 A.2d 513 (1968); *Silver v. Zoning Board of Adjustment*, 381 Pa. 41, 112 A.2d 84 (1955). This requirement applies with equal force to formal proceedings before administrative agencies. *Process Gas Consumers Group v. Pa. P.U.C.*, 84 Pa. Commonwealth Ct. 76, 480 A.2d 1273 (1984).

The doctrine of ripeness ensures a court or administrative agency actually has a case or controversy before it for adjudication. The requirement of ripeness assures that a court or administrative agency does not render advisory opinions on merely hypothetical questions. The Commission in *Thomas C. States v. Pennsylvania Electric Company and United Electric Cooperative, Inc., (States)* 1995 Pa. P.U.C. LEXIS 179, 24 (Initial Decision dated Nov. 29, 1995), adopted without modification, 1996 Pa. P.U.C. LEXIS 174 (Order dated Jan. 16, 1996) determined:

The Complainant has just recently completed construction of his new residence. There is no doubt, based upon his testimony and demeanor during the hearings in this case, of his intention to build a garage, as well. The only hypothetical aspect of this case concerns the location of the garage, which the Complainant forthrightly acknowledges will depend upon which utility will provide him with electric service. Therefore, little danger exists of the Commission rendering an advisory opinion on a hypothetical question, which may never come to pass. Certainly, the ripeness doctrine should not be so stringently construed as to require an individual to risk the expense of building a structure upon a given location with the hope that he or she will ultimately prevail in a legal proceeding to obtain electric service of his/her choice to that site. Clearly, the Complainant here pursued the more prudent course of seeking the Commission's decision before erecting his garage. Accordingly, the rationale for application of the doctrine of ripeness does not exist here. Thus, I will address the merits of his claim.

As explained *supra*, for the purposes of deciding Preliminary Objection # 2, the Complainants' averments regarding the proposed extension of bi-directional service must be viewed as true, and any doubt must be resolved in favor of the Complainants by refusing to sustain the Preliminary Objection. After carefully reviewing the parties' allegations, I find that, by allowing the Complaint to proceed to evidentiary hearings, the Commission will not be rendering "an advisory opinion on a hypothetical question, which may never come to pass." Consequently, Laurel's Preliminary Objection # 2 is overruled.

**PRELIMINARY OBJECTION # 3 - Complainants Have Failed To State A Claim That Any Diminution Or Alteration Of Westbound Intrastate Petroleum Products Transportation Service Due To The Bidirectional Service Extension Is An Abandonment Of Service Under 66 Pa.C.S. § 1102(a)(2)**

In its Preliminary Objection, Laurel argues that the Complaint only advances conclusory allegations that an unspecified partial abandonment will occur because the

Bidirectional Service Extension will result in an unspecified and unquantified reduction of westbound capacity on the Laurel pipeline system. Preliminary Objections ¶ 60.

Laurel points out that the Complaint does not allege that the Bidirectional Service Extension will result in Laurel permanently ceasing to provide intrastate transportation of petroleum products from any existing origin point or to any existing delivery point. *Id.*, at ¶¶ 61-62. It further point out that the Complaint does not allege that the Bidirectional Service Extension will result in a specific, quantified reduction of westbound capacity on Laurel's pipeline system, or in Laurel's relinquishment of any of its rights under its certificate of public convenience. *Id.*, at ¶¶ 63-64. According to Laurel, the Complainants' averments stand for the proposition that any change or diminution of westbound, intrastate petroleum products transportation at all results in a partial abandonment of service requiring a certificate of public convenience. Laurel objects to such a proposition arguing that,

If a "diminution" of service is an abandonment of service, then any time a natural gas or water utility reduced the pressure of its system, an abandonment of service would occur. Similarly, if a "diminution" of service is an abandonment of service, any time a natural gas utility implemented more stringent gas quality specifications (and thereby diminished what gas could be injected onto its system), this change in quality specifications would be an abandonment of service.

*Id.*, at ¶ 68.

In their Response, Complainants explain that the Complaint does not allege that any diminution of service constitutes an abandonment, but rather that the proposal to extend bi-directional service to Sinking Spring presents sufficient operational challenges to constitute an abandonment of service. Response to Preliminary Objections ¶ 30. They further argue that Commission precedent supports dismissal of Laurel's Preliminary Objection # 3 in favor of developing a record on whether the proposed extension of bi-directional service is an abandonment of service or a justified exercise of managerial discretion that does not rise to the level of abandonment of service. *Id.*, at ¶ 29, citing *Harris v. Nat'l. Transit Co.*, 1976 Pa. PUC LEXIS 50, at \*4-5 (Order Entered Aug. 27, 1976) (*Harris*).

Viewing as true the Complainants' averments regarding the expansion of bi-directional service eastward on the Laurel Pipeline and resolving any doubts in favor of the Complainants, I do not find that Complainants have failed to state a claim against Laurel that the diminution or alteration of westbound intrastate service due to the Bidirectional Service Extension constitutes an abandonment of service. Consequently, Laurel's Preliminary Objection # 3 is overruled.

**PRELIMINARY OBJECTION # 4 - Complainants Have Failed To State A Claim That The Bidirectional Service Extension Is Inconsistent With Laurel's Existing Intrastate Tariff**

In its Preliminary Objection #4, Laurel seeks to dismiss Count No. 1 of the Complaint. Count No. 1 of the Complaint asserts, *inter alia*, that the Bidirectional Service Extension is inconsistent with and requires a modification of Laurel's existing intrastate tariff, Laurel Pipe Line Company, L.P. – Tariff Pa. P.U.C. No. 81 (effective January 1, 2012) and Laurel Pipe Line Company, L.P. – Tariff Pa. P.U.C. No. 83 (effective July 1, 2024), pursuant to Sections 1302 and 1303 of the Code. Preliminary Objections, ¶ 71. Laurel argues that Complainants have failed to state a legally sufficient claim that Laurel's Bidirectional Service Extension is inconsistent with its existing tariff. Preliminary Objections, ¶ 73.

Laurel explains that its Tariff contains the following provision:

Subject to the Rules and Regulations contained herein, Commodities will be accepted for transportation at points of Origin at such times as Commodities of the same quality and specifications are currently being transported or Carrier is scheduling such Commodities for shipment from such Origins in accordance with Carrier's sequence of pumping. Carrier reserves the right to establish and alter pumping sequences and schedules to facilitate the efficient use and operation of its facilities. Carrier may decline to accept certain Commodities with specific product grade specifications based on the operating availability of pipeline facilities or when tankage constraints or other operation conditions do not permit the acceptance of said specific Commodity product grade.

Preliminary Objections, ¶ 74, *citing* Laurel Pipe Line Company, L.P. – Tariff Pa. P.U.C. No. 83 (effective July 1, 2024.), page 4, Item No. 10(B) (emphasis in Preliminary Objections).

According to Laurel, Item No. 10(B) specifically reserves Laurel’s right to alter intrastate pumping sequences and schedules to facilitate the efficient use and operation of Laurel’s facilities. Preliminary Objections, ¶ 75. Laurel avers that it has altered its pumping sequences and schedules without making a tariff filing many times in the past and that its Bidirectional; Service Extension constitutes a modification of pumping sequences and schedules. *Id.*

In addition, Laurel argues that Item No. 90 of Laurel’s Tariff will not be altered and will be maintained pursuant to its terms under the Bidirectional Service Extension. Item No. 90 provides, among other things, that:

Until December 31, 2026, outside of force majeure circumstances that impact Laurel’s ability to provide such capacity, the available, physical capacity of east-to-west transportation on Carrier’s system between Coraopolis and Duncansville, Pennsylvania (this segment also being known as “Line 718” or “L718”) will be no less than 1,200,000 barrels per cycle (which is 120,000 barrels per day times ten days in a cycle), unless that obligation is terminated or modified earlier in accordance with the terms of the Settlement Agreement in PUC Docket No. C-2018-3003365 and FERC Nos. IS19-277-000, IS19-277-001, IS19-278-000 and IS19-278- 001.

Preliminary Objection ¶ 78. This guarantee is left undisturbed by the Bidirectional Service Extension, and Laurel points out that the Complainants have not alleged otherwise. *Id.*, at ¶ 79.

In their Response, the Complainants argue that prior to implementation of any expansion of bi-directional service, Laurel must change its tariff and “[s]uch changes must include the rules, terms, and conditions under which bi-directional service is to be provided in a manner that does not impair service to the point of constituting abandonment.” Response to Preliminary Objections ¶ 33. Accordingly, Complainants claim that Laurel’s expansion of bi-directional service conflicts with the 40,000 to 60,000 bpd of capacity allocated to Buckeye under the Capacity Use Agreement, which is a contract related to rates, raises an inconsistency between the proposed expansion of bi-directional service and Laurel’s tariff. Complainants

further maintain that Buckeye's expansion of interstate west-to-east capacity to 80,000 bpd will impair the 120,000 bpd capacity guarantee set forth both in the Capacity Use Agreement and Rule 90 of Laurel's intrastate tariff thus creating inconsistencies between the proposed bi-directional expansion and Laurel's tariff. *Id.*

Whether the Phase 3 initiation constitutes a permissible change under Laurel's current tariff, and whether the additional service will impact on the volumes that shippers can continue to transport on the Laurel Pipeline are questions of fact which cannot be disposed of through preliminary objections. For the purposes of deciding the Preliminary Objection # 4, the Complainants' averments regarding the expansion of bi-directional service eastward on the Laurel Pipeline must be viewed as true, and any doubt must be resolved in favor of the Complainants by refusing to sustain the Preliminary Objection. Consequently, Laurel's Preliminary Objection # 4 is overruled.

ORDER

THEREFORE,

IT IS ORDERED:

1. That the Preliminary Objections filed on February 11, 2025, by Laurel Pipe Line Company, L.P. are overruled.

2. That the Complaint filed by Monroe Energy, LLC, Lucknow Highspire Terminals, LLC, Sheetz, Inc., and PBF Holding Company LLC against Laurel Pipe Line Company, L.P. will be set for a hearing.

Date: April 21, 2025

\_\_\_\_\_/s/  
Eranda Vero  
Administrative Law Judge

**C-2025-3053018 - MONROE ENERGY LLC; LUCKNOW-HIGHSPIRE TERMINALS LLC; SHEETZ INC; AND PBF HOLDING COMPANY LLC v. LAUREL PIPE LINE COMPANY, L.P.**

*Revised April 21, 2025*

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