

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Sunoco Pipeline L. P. for a	:	
Finding That the Situation of Structures to	:	Docket Nos. P-2014-2411941,
Shelter Pump Stations and Valve Control	:	2411942, 2411943, 2411944,
Stations is Reasonably Necessary for the	:	2411945, 2411946, 2411948,
Convenience and Welfare of the Public	:	2411950, 2411951, 2411952,
		2411953, 2411954, 2411956,
		2411957, 2411958, 2411960,
		2411961, 2411963, 2411964,
		2411965, 2411966, 2411967,
		2411968, 2411971, 2411972,
		2411974, 2411975, 2411976,
		2411977, 2411979, 2411980.

Petition to Intervene

Pipeline Safety Coalition (PSC), a Pennsylvania non profit entity, hereby Petitions to Intervene in response to Sunoco Pipeline L. P.’s (“Sunoco”) Petition for a “Finding That the Situation of Structures to Shelter Pump Stations and Valve Control Stations is Reasonably Necessary for the Convenience and Welfare of the Public” (“Petition”). PSC requests that the Pennsylvania Public Utilities Commission (“Commission”) grant Intervenor status pursuant to 52 Pa. Code §§5.71-75 in proceedings of the Commission concerning Sunoco’s Petitions. PSC provides the following in support of its Petition to Intervene:

1. The name and address for Petitioner:

Pipeline Safety Coalition, Executive Director, Lynda Farrell

331 Norwood Road, Downingtown, PA 19335

2. Sunoco is engaged in developing a pipeline project called Mariner East (“Project”), which involves a combination of the construction of new pipeline facilities and the use of existing pipeline facilities that will transport ethane and propane. The origination point of the Mariner East will be in Houston, Pennsylvania and the delivery point will be located in Claymont, Delaware, within the Marcus Hook Refinery Complex. The purpose of the Project is to increase transportation infrastructure for the movement of Marcellus Shale resources.
3. The project is anticipated to have an initial capacity to transport approximately 72,250 barrels per day of natural gas liquids and can be “scaled to support higher volumes as needed.”¹ Sunoco has failed to describe in its submissions the ceiling capacity of its system.
4. Sunoco's Project requires the construction of 17 valve stations in 15 different municipalities and the construction of 18 pumping stations in 18 different municipalities. The overall project appears to involve 36 Pennsylvania counties. The Petition for each of the municipalities requests an exemption from section 619 of the Pennsylvania Municipalities Planning Code (53 P.S. § 10619).
5. Intervention in Commission proceedings is permitted where a person or entity has an interest in the matter “which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action

¹ See <http://www.sunocologistics.com/Customers/Business-Lines/Natural-Gas-Liquids-NGLs/NGL-Projects/208/>.

or proceeding,” or “another interest of such nature that participation of the petitioner may be in the public interest.” 52 Pa. Code § 5.72(a)(2), (3).

7. As a Pennsylvania not for profit that serves the educational needs of the Pennsylvania community at large, PSC is directly affected by this proceeding and respectfully requests the Pennsylvania Public Utility Commission:

- a. Grant this Petition to Intervene and,
- b. Make any other such orders as are just and appropriate.

Dated: April 21, 2014

Respectfully Submitted by:



Lynda Farrell, Executive Director, Pipeline Safety Coalition

VERIFICATION

I, Lynda Farrell, Executive Director, Pipeline Safety Coalition, hereby state that the facts above set forth in the Petition to Intervene are true and correct (or are true and correct to the best of my knowledge, information, and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. 4904 (relating to unsworn falsification to authorities).

Dated: April 21, 2014

Lynda Farrell, Executive Director, Pipeline Safety Coalition

