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July 11, 2017

**VIA ELECTRONIC MAIL AND U.S. MAIL FIRST CLASS**

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

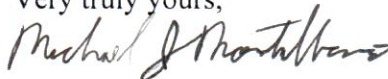
**Re: *West Goshen Township v. Sunoco Pipeline L.P.***  
**Docket No. C-2017-2589346**

Dear Secretary Chiavetta,

Enclosed please find the corrected Affidavit of Matthew Gordon, which is being filed in the above-referenced case. This Affidavit is meant to replace Exhibit A to Sunoco Pipeline L.P.'s Opposition to West Goshen Township's Request for Ex Parte Relief, which was filed on July 10, 2017 under e-Filing Confirmation No. 1684133. Exhibit A contains a typographical error in the date in paragraph 8. The date was intended to refer to the date of the hearing scheduled before Administrative Law Judge Barnes and should have been July 18, 2017 rather than July 18, 2018. The enclosed Affidavit corrects this error.

Thank you for your attention to this matter, and please do not hesitate to contact me with any questions or concerns.

Very truly yours,



Michael J. Montalbano

Enclosures

cc: As per Certificate of Service  
Honorable Elizabeth Barnes (*via email and U.S. Mail First Class*)  
Honorable Charles Rainey (*via email and U.S. Mail First Class*)  
Robert F. Young, Esquire (*via email and U.S. Mail First Class*)

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*Attorneys for Defendant  
Sunoco Pipeline L.P.*

WEST GOSHEN TOWNSHIP AND	:	
CONCERNED CITIZENS OF WEST	:	
GOSHEN TOWNSHIP	:	
	:	
Complainant,	:	Docket NO. C-2017-2589346
	:	
v.	:	
	:	
SUNOCO PIPELINE L.P.,	:	
	:	
Respondent.	:	
	:	

**AFFIDAVIT OF MATTHEW GORDON**

COMMONWEALTH OF PENNSYLVANIA :  
 :  
 : SS.  
COUNTY OF BERKS :

I, Matthew Gordon, being duly sworn according to law, do hereby depose and state the following to be true and correct to the best of my knowledge and/or based upon my information and belief:

1. I am employed by Sunoco Pipeline L.P. ("SPLP") as the Project Director for the Mariner East 2 pipeline project. I am authorized to make this Affidavit on behalf of SPLP.
2. SPLP's project team and engineering group has determined that siting Valve 344 on the SPLP Use Area is not prudent or feasible due to numerous engineering constraints. The


engineering constraints include, among other things: insufficient room to site the equipment needed to install the valve given the demands of the horizontal directional drilling; the need to open-cut Boot Road, which would severely disrupt traffic in West Goshen Township and create noise and inconvenience; and the creation of possible adverse impacts to Route 202 which would be avoided by siting the valve elsewhere.

3. In 2017 SPLP purchased the property that is referred to as the "Janiec 2 Tract" in the Petition of West Goshen Township For An Ex Parte Emergency Order And An Interim Emergency Order. This property is situated at Boot Road and Route 202, on the east side of the highway, across from the property that was the subject of the Settlement Agreement.
4. The Janiec 2 Tract is the site for the pullback area for the horizontal directional drilling ("HDD") that will be used to install the pipe through West Goshen Township. Regardless of where the valve station is located, SPLP will need to engage in the work on the Janiec 2 Tract in order to install the Mariner East 2 pipeline.
5. The Commonwealth Department of Environmental Protection ("DEP") has issued a Chapter 102, Erosion and Sediment Control Permit for the work that will be performed on the Janiec 2 Tract.
6. West Goshen Township issued Earth Disturbance Permit 2017-202-1 for the work that will be performed on the Janiec 2 Tract.
7. SPLP has notified West Goshen Township on several occasions that it needs to site Valve 344 on the Janiec 2 Tract.
8. Work on Valve 344 will not commence until after the HDD is completed; accordingly, the installation of the valve will not occur before July 18, 2017.
9. An order from the Pennsylvania Public Utility Commission directing SPLP to cease work at the Janiec 2 Tract would substantially disrupt and delay the completion of the Mariner East 2 pipeline, causing consequent harm to producers, shippers, and consumers.

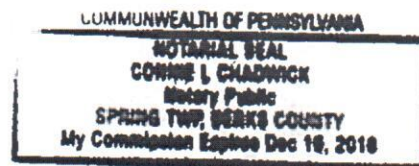
  
MATTHEW GORDON

Sworn to and Subscribed

Before me this 11 day of July, 2017



Notary Public



**CERTIFICATE OF SERVICE**

I, Michael J. Montalbano, certify that on July 11, 2017, I caused a true and correct copy of the Corrected Affidavit of Matthew Gordon to be served upon the party listed below by electronic mail and Federal Express or First Class Mail, in accordance with the requirements of 52 Pa.

Code § 1.54 (relating to service by a party):


Honorable Elizabeth H. Barnes  
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Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17101



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Michael J. Montalbano  
Attorney for Sunoco Pipeline L.P.