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July 13, 2017

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JUL 13 2017

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**VIA FEDERAL EXPRESS**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street – Filing Room  
2<sup>nd</sup> Floor North  
Harrisburg, PA 17105

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

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code § 1.36 (c), enclosed please find the original copy of the Affidavit of Matthew Gordon, a scanned copy of which was attached as Exhibit A to Sunoco Pipeline L.P.'s Letter in Opposition of West Goshen Township's request for an *Ex Parte* Order which was electronically filed on July 10, 2017. A corrected version was filed on July 11, 2017, and is enclosed herein.

If you have any questions on this matter, please call me at 215-569-5725.

Sincerely,



FRANK L. TAMULONIS

Enclosures

cc: Christopher A. Lewis, Esq. (*via email*) (w/out encl.)

**BLANK ROME LLP**

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*Attorneys for Defendant  
Sunoco Pipeline L.P.*

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

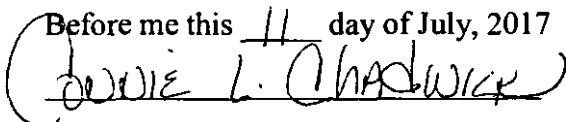
engineering constraints include, among other things: insufficient room to site the equipment needed to install the valve given the demands of the horizontal directional drilling; the need to open-cut Boot Road, which would severely disrupt traffic in West Goshen Township and create noise and inconvenience;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

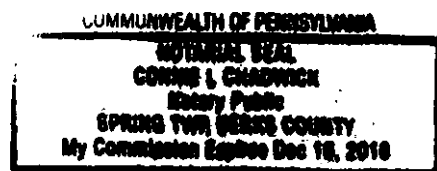
  
MATTHEW GORDON

Sworn to and Subscribed

Before me this 11 day of July, 2017



Notary Public



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PHILADELPHIA, PA 19103  
UNITED STATES US

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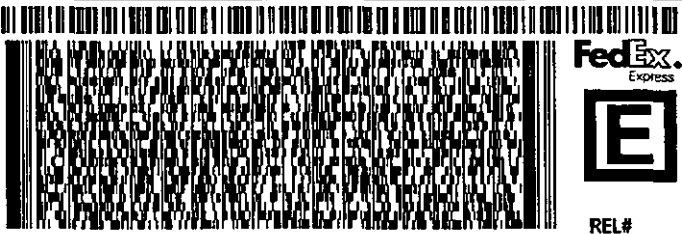
BILL SENDER

TO **ROSEMARY CHIAVETTA**  
**PENNSYLVANIA PUBLIC UTILITY COMM**  
**COMMONWEALTH KEYSTONE BUILDING**  
**400 NORTH STREET, 2ND FLOOR**  
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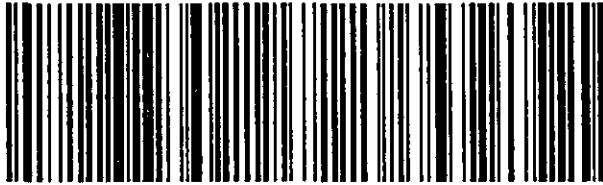
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