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August 9, 2017

Administrative Law Judge Eranda Vero
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107

VIA E-MAIL AND
FIRST CLASS MAIL

RE: Application of Laurel Pipe Line Company, L.P. for All Necessary Authority, Approvals, and Certificates of Public Convenience To Change the Direction of Petroleum Products Transportation Service to Delivery Points West of Eldorado, Pennsylvania; Docket No. A-2016-2575829

Affiliated Interest Agreement between Laurel Pipe Line Company, L.P. and Buckeye Pipe Line Company, L.P.; Docket No. G-2017-2587567

Dear Administrative Law Judge Vero:

On behalf of Gulf Operating, LLC ("Gulf") and Sheetz, Inc. ("Sheetz"), this correspondence attaches Objections to the Deposition Notices filed by Laurel Pipe Line Company ("Laurel") on July 27, 2017 ("Notices"). In the Notices, Laurel describes seven separate areas of inquiry that it intends to pursue in the depositions, it also requested that Gulf and Sheetz produce all documents not already produced that are related to the subject matter of the seven areas of inquiry. Laurel also asked for a reduction in the amount of notice that would otherwise be required prior to the taking of a deposition.

On August 7, 2017, Gulf and Sheetz served Objections to the Notices, with a Transmittal Letter filed with the Commission. The Objections were served on all parties including Laurel, but inadvertently not served on Your Honor. Subsequently, Your Honor issued Orders approving the Notices on August 8, 2017.

Notably, Gulf and Sheetz did not object to the taking of the deposition, but objected solely to the scope of subject matter set forth in subparts 5(i), (ii), (v), and (vii) of Laurel's Notices, the 7-day turn-around for documents, and the basis that the Notices did not address documents or areas of inquiry subject to privilege. Accordingly, Gulf and Sheetz have engaged in discussions with Laurel and confirmed depositions for Sheetz on August 22, 2017, with Gulf following on August 23, 2017.

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With regard to the Objections as to production of documents, Gulf and Sheetz understand such objections, under Sections 5.343(d), 5.349(d) and 5.342 of the Commission's Regulations, to be governed by the process applicable to written interrogatories. 52 Pa. Code §§ 5.343(d), 5.349(d) and 5.342.

As to the remainder of the Objections, Gulf and Sheetz aver that consideration of the Objections as to the scope of subject matter identified in subparts 5(i), (ii), (v), and (vii) the Notices would not prejudice the substantive rights of any party pursuant to Section 1.2 of the Commission's Regulations. 52 Pa. Code § 1.2. Moreover, a ruling on the scope of issues may be necessary to ensure consistency with Your Honor's prior Order of May 10, 2017, denying Laurel's Motion to Compel responses to its Set I Interrogatories to Gulf.

Accordingly, Gulf and Sheetz respectfully request that Your Honor consider the Objections as to scope attached hereto as Appendices A and B and issue amended or further Orders on the Notices as may be appropriate following consideration of the attached Objections.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By



Adeolu A. Bakare

Counsel to Gulf Operating, LLC
and Sheetz, Inc.

c: Rosemary Chiavetta, Secretary (via Electronic Filing – Letter and Certificate of Service only)
Certificate of Service

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Docket No. A-2016-2575829 and G-2017-2587567

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Dated this 9th day of August, 2017, in Harrisburg, Pennsylvania.