

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: Sunoco Pipeline L.P. a/k/a/ :
Energy Transfer Partners : Docket No. P-2018-3000281
 :
Petition of the Bureau of Investigation and :
Enforcement of the Pennsylvania Public :
Utility Commission for the Issuance of an :
Ex Parte Emergency Order :

EMERGENCY PETITION TO INTERVENE OF ANDOVER HOMEOWNERS' ASSOCIATION, INC.

Pursuant to 52 Pa. Code § 5.71 *et. seq.*, Andover Homeowners' Association, Inc.

("Association") hereby petitions to intervene in the above-captioned proceeding. In support thereof, the Association submits as follows:

1. The name and contact information for the petitioner is as follows:

Andover Homeowners' Association, Inc.
9 Fallbrook Lane
Glen Mills, PA 19342

2. The Association's attorney in this manner, and all documents should be served upon:

Rich Raiders, Esq.
Lengert & Raiders LLC
210 West Penn Avenue
PO Box 223
Robesonia, PA 19551
484-638-6538
rraiders@lengertraiders.com

3. On March 7, 2018, the Public Utility Commission's Bureau of Investigation and Enforcement ("BIE") filed a petition ("Petition") with the Public Utility Commission ("Commission" or "PUC") for an *ex parte* emergency order under 52 Pa. Code 3.2 to require Sunoco Pipeline L.P. a/k/a Energy Transfer Partners ("Sunoco") to suspend operations on its Mariner East 1 ("ME1") pipeline.

4. BIE alleged that three sinkholes emerged within proximity of ME1, an 8" diameter 1930s-era hazardous liquids pipeline converted to transport highly volatile natural gas liquids ("NGL") this decade.
5. BIE further alleged that these sinkholes emerged coincident with Sunoco's construction of the Mariner East 2 ("ME2") and Mariner East 2X ("ME2X") pipelines, two new pipelines mostly routed adjacent and parallel to the ME1 high consequence area ("HCA") rights of way throughout southeast Pennsylvania.
6. The Association understands that Sunoco had knowledge of at least one such sinkhole in 2017, without reporting such events to the PUC or the Pipeline and Hazardous Materials Safety Administration ("PHMSA").
7. Sunoco had, prior to March 3, 2018, filled at least two sinkholes with concrete without notifying the PUC or PHMSA.
8. On March 3, 2018, PUC had become aware of the sinkhole issue, including a recently developed third sinkhole in the vicinity of the first two sinkholes.
9. On information and belief, these sinkholes were proximately caused by Sunoco's ME2 and ME2X construction practices, including horizontal directional drilling ("HDD") through the highly variable and substantially fractured geology of southeast Pennsylvania.
10. This HDD activity and the resulting sinkholes caused portions of ME1 to become exposed.

Emergency Ex-Parte Order

11. On or about March 7, 2018, the Commission granted the Emergency Order requested by BIE and suspended ME1 service until further Commission Order.
12. Sunoco was required to inspect ME1 one mile before and after the area where sinkholes were observed while ME1 operations remain suspended.
13. Sunoco was also required to conduct geophysical testing and analyses restricted to the “area described in the BIE petition.”
14. The Commission ratified the Order at its March 15, 2018 Public Meeting.
15. Section 1505 of the Public Utility Code requires any operator holding a Certificate of Public Convenience (“CPC”) to furnish “adequate, efficient, safe and reasonable service and facilities” for the transportation of commodities as regulated by the Commission. 66 Pa. C.S. § 1505
16. Section 1505 of the Public Utility Code also requires operators to “make all such repairs, changes, alterations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for accommodation, convenience or safety of its patrons, employees, and the public.” *Id.*
17. The Commission may Order all required modifications to protect the “safety, accommodation, and convenience of the public.” 66 Pa. C.S. § 1505(a).
18. The Commission has the authority to enforce PHMSA’s safety standards at 49 CFR §§ 190, 191 and 195. 52 Pa. Code § 59.33(b).

The Association's Interest in this Proceeding

19. Intervenor may petition to participate to represent “an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bounded by the action of the Commission in the proceeding.” 52 Pa. Code. 5.72(a)(2).
20. The Association seeks to intervene in this proceeding, and any subsequent hearing and conferences related to the testing and analysis of ME1, proposals and implementation of corrective actions, and any request for reinstatement of highly volatile NGL transportation services using ME1.
21. The Association, a Pennsylvania nonprofit corporation, owns a parcel of land in Thornbury Township, Delaware County (the Andover “Open Space”), which the Association administers and maintains for the use and enjoyment of its Members, the owners of the 39 private residences within the Andover subdivision.
22. The Andover Open Space is subject to a right of way containing approximately 2,000 feet of ME1.
23. Association Members own parcels and homes upon said parcels, adjacent to or in the immediate vicinity of ME1. The closest residences are less than one hundred (100) feet from the ME1.
24. Association property also contains an ME1 valve site, believed to be the second valve site downstream of the segment that is subject to the instant *ex parte* Order.

25. Sunoco has proposed horizontal directional drilling (“HDD”) for construction of ME2 and ME2X on and near Association property, also being near the property of Association Members.
26. The Association’s parcel is believed to exhibit fractured geology, in some respects believed to be similar to the fractured geology found in the West Whiteland Township area where sinkholes emerged.
27. The Association believes that Sunoco conducted no geophysical testing in the vicinity of Association property where Sunoco proposes to conduct HDD activities to construct ME2 and ME2X.
28. As such, the Association, concerned about protecting its own property, adjacent and nearby property owned by its Members, and the physical safety of these same Members, is directly affected by the Order.
29. The Association, Association Members, and owners of adjacent and nearby properties outside of Andover but within Thornbury Township, are also directly affected by this Order.
30. The Order requires Sunoco to suspend operations of the highly volatile NGL transportation service and inspect a certain pipeline segment upstream of Association property.
31. On information and belief, ME1 traverses a number of highly fractured and weathered geological formations in Delaware and Chester Counties.
32. On information and belief, the Association has become aware of a large number of “frac-outs” or “inadvertent returns”, situations where Sunoco loses control of the

drilling fluid used to construct ME2 and ME2X, along or in the vicinity of the ME1 pipeline corridor.

33. On information and belief, such “inadvertent returns” in the vicinity of ME1 could, in theory, impact the integrity of ME1.
34. On information and belief, Sunoco has not conducted any evaluation of “inadvertent returns” and the impact on ME1 operations.
35. On information and belief, Sunoco has not conducted substantial geophysical analyses of any of the ME1 corridor near Association property where it intends to conduct HDD or has conducted HDD activities.
36. Despite the known issues with sinkholes in southeast Pennsylvania, the Order does not require Sunoco to conduct a holistic evaluation of ME1 safety, especially related to ME2 and ME2X construction, near the area of ME1 valve sites.
37. Despite the known issues with sinkholes in southeast Pennsylvania, the Order does not require Sunoco to conduct a holistic evaluation of ME1 safety, especially related to ME2 and ME2X construction, near the area of other proposed or completed ME2 or ME2X HDD construction areas.
38. Based on Sunoco’s failure to report the formation of sinkholes in West Whiteland Township for several months, the Association and its members have no assurance that Sunoco will report integrity threats to ME1 in Thornbury Township.

Public Safety Concerns

39. The Association and its Members are deeply concerned that the instant sinkhole issue identified by BIE and now subject to the Commission's Order is not the only potential integrity and safety risk concerning this ME1 pipeline.
40. To the Association's knowledge, Sunoco has not responded to Thornbury Township's expressions of concern about Sunoco's pipeline operations. *See, Exhibits "A" and "B".*
41. Between 2006 and 2018, Sunoco reported to PHMSA that it experienced three hundred (300) PHMSA-reportable leaks to the federal government. *See, Exhibit "C".*
42. Many of these leaks occurred in Pennsylvania, and the Association believes that at least three of these leaks occurred on ME1.
43. The Association believes that Sunoco has not demonstrated a competent ability to assess and manage risks to ME1 or other pipeline assets it owns or manages. Specifically, the Association and its Members are concerned about, for example, the 2017 ME1 leak in Morgantown Township, Berks County, and the leaks in Edgmont Township in 1988, 1992 and 2015.
44. Sunoco has provided little public information about the products it transports in the Mariner East pipelines. *See, Exhibits "D" and "E".*
45. On information and belief, Sunoco acknowledges that leaks of natural gas liquids can have serious consequences, which Sunoco is unable to guarantee will not occur on ME1.
46. On information and belief, if ME1 were to suffer an integrity breach that damaged the pipeline, Sunoco would have no choice but to evacuate an entire segment, between valve sites, to manage any such pipeline incident. If Sunoco were unable to accomplish

such evacuation, the Association believes the very large amount of material in a breached segment would volatilize and become released to the atmosphere

47. The Association, as hosts of a ME1 valve site, is very concerned about how Sunoco manages its integrity program and how Sunoco would manage an event along the pipeline right-of-way or within a valve site.
48. The Association understands that Sunoco, as part of its public awareness campaign, distributes certain documents concerning pipeline safety. *See Exhibit "C"*.
49. The Association understands that PHMSA also distributes certain pipeline awareness information. *See Exhibit "D"*.
50. The ME1 reportable leaks known to PHMSA include one pipe failure and two failures of above-ground facilities, such as valve sites.
51. NGLs, if released to the atmosphere, volatilize to a colorless, odorless, heavier than air and extremely flammable gas. *See Exhibit "B"*.
52. Neither the Association nor, on information and belief, its host municipality, Thornbury Township, Delaware County, have been provided adequate sufficient guidance about how to respond if the pipeline has been compromised. *See Exhibits "D" and "E"*, expressing the Thornbury Township's safety concerns about Sunoco's operations within its municipal boundaries.
53. Based on Sunoco's failure to notify the appropriate authorities when the sinkholes began in November 2017, the Association believes that Sunoco's incident management system has failed.

54. Further, if Sunoco's incident management system had properly functioned during this incident, homeowners, some within one hundred (100) feet of ME1, would have not been allowed to remain in their homes for months while Sunoco struggled to manage the sinkholes now the subject of this action.
55. Sunoco did not report any potential ME1 risks caused or potentially caused by the instant sinkholes to the PUC.
56. The Association is concerned that, because Sunoco did not report this substantial risk to the PUC until the PUC was alerted of the issue by third parties, that Sunoco may have not reported other potential or actual ME1 related safety risks to the PUC.
57. Without a comprehensive pipeline safety review, the PUC may or may not have any idea of the scope or magnitude of potential or actual safety risks associated with Sunoco's ongoing operating ME1.
58. Without a comprehensive pipeline safety review, the PUC may or may not have any idea of the scope or magnitude of potential actual and safety risks of Sunoco's construction of ME2 and ME2x upon ME1.
59. The Association is concerned that a similar event, where the pipeline is compromised to an unknown integrity state, could easily occur at other ME1 segments, including the ME1 segment under the Andover Open Space.

Request for Relief

60. The Association requests that the Commission order that Sunoco conduct full line inspections and geophysical testing of all areas proposed for HDD construction activity in Delaware and Chester Counties, or in other locations where the geology along the

pipeline route or nearby construction could potentially impact pipeline integrity, before allowing ME1 operations to resume.

61. The Association further requests that Sunoco be prohibited from reinstating ME1 transportation services until the results of said testing and analysis are reviewed and approved by BIE/Pipeline Safety staff, Sunoco takes all necessary corrective actions to the satisfaction of BIE/Pipeline Safety staff, and BIE/Pipeline Safety approves reinstatement of transportation services, subject to Commission review and approval.
62. The Association further requests that Sunoco be prohibited from reinstating ME1 transportation services until the results of a full review of all proposed and actual HDD sites in proximity to ME1 is completed to allow BIE/Pipeline Safety staff to certify that application of the ME2/ME2X construction methods that caused the instant sinkholes do not similarly risk pipeline integrity or impact other portions of Southeast Pennsylvania.
63. The Association's interests, as a land owner hosting a ME1 pipeline easement in an area believed to be geologically similar to West Whiteland Township, are direct, immediate and substantial and are not adequately represented by any other parties that may seek to intervene.
64. Consequently, the Association satisfies the standards for intervention under 52 Pa. Code § 5.72.
65. Emergency relief is permitted where there is (1) a clear right to relief; (2) immediacy; (3) irreparable harm; and (4) relief will not harm the public interest. 52 Pa. Code 3.6, *Glade*

Park East Home Owners Ass'n v. Pa. Pub. Util. Comm'n, 628 A.2d 468 (Pa. Commw. 1993).

66. The Association has a clear right to intervene in this proceeding.
67. The need for intervention is appropriate because Sunoco can apply for reinstatement of highly volatile NGL transportation on ME1 within approximately 10-14 days.
68. The need for intervention is appropriate because Sunoco's lack of reporting the sinkhole problem to PUC could indicate further safety related issues that could arise under the PUC's authority.
69. Further, the March 7, 2018 Order recognizes that the failure to ensure the integrity of ME1 could cause irreparable harm. The Commission concludes that "permitting the continued flow of hazardous liquids through the ME1 pipeline without the proper steps to ensure the integrity of the pipeline could have catastrophic results impacting the public."
70. The Association would be irreparably harmed if Sunoco does not ensure the integrity of the entire ME1 line, and particular areas where HDD construction methods in close proximity to ME1 could compromise ME1 integrity.
71. "Whenever an operator discovers any condition that could adversely affect the safe operation of its pipeline system, it must correct the condition within a reasonable time. However, if the condition is of such a nature that it presents an immediate hazard to persons or property, the operator may not operate the affected part of the system until it has corrected the unsafe condition." 49 CFR 195.401(b).

72. Until BIE/Pipeline Safety conducts a comprehensive evaluation of all geologically sensitive areas where Sunoco has or plans to conduct HDD activities, the Commission is without adequate information to evaluate if ME1 transportation is safe to operate.

73. Participation by the Association will not harm the public interest, but rather, will help “ensure the integrity of the pipeline” and avoid the “catastrophic results impacting the public” that the Commission recognized in the March 7, 2018 Order.

74. Pursuant to 52 Pa. Code 1.54(b)(3), the undersigned counsel consent to the electronic service of all documents at the email address shown above.

WHEREFORE, the Association respectfully requests that the Commission grant this Petition to Intervene, providing the Association with full-party status in this proceeding and any hearings or conferences held, and with the ability to comment; that the Commission deny the reinstatement of ME1 transportation services until Sunoco has conducted the required testing and analysis of the portion of ME1 that traverse Association property and nearby areas as set forth herein, and the results of such testing and analysis, any required corrective action, and reinstatement, have been reviewed and approved by BIE/Pipeline Safety, subject to Commission review and approval; and that the restart of such operations is not approved until the Commission is satisfied the Association has been provided a credible notification system and safety plan for its residents, including specifically the evacuation plan sought by Thornbury Township in its Proclamation of Concern, and that the Commission take such other actions as it finds appropriate to protect public safety under the circumstances.

Respectfully Submitted,

Dated: March 26, 2018


A handwritten signature in black ink, appearing to read "Repe", is positioned above a horizontal line.

Rich Raiders, Esq.
Attorney ID 314857
210 West Penn Avenue
PO Box 223
Robesonia, PA 19551
484-638-6538
rraiders@lengertraiders.com

VERIFICATION

I, Eric Friedman, am the President of the Andover Homeowners' Association, Inc. I hereby state that the facts set forth herein 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 made herein are subject to the penalties of 18 Pa. C.S. Section 4904 concerning unsworn falsifications to authorities.

Dated: March 22, 2018



Eric Friedman

EXHIBIT A
Thornbury Township Letter



THORNBURY TOWNSHIP

W W W . T H O R N B U R Y . O R G

August 29, 2016

BOARD OF
SUPERVISORS:

James H. Raith
James P. Kelly
Sheri L. Perkins

*Public Meeting:
1st Wednesday of each month*

Sunoco Logistics
Sunoco Pipeline L.P.
525 Fritztown Road
Sinking Spring, PA

Re: Mariner East 2 Pipeline Project
Thornbury Township, Delaware County, Pennsylvania

Dear Sir/Madam,

The Board of Supervisors of Thornbury Township requests that Sunoco Logistics address concerns outlined in this correspondence prior to the start of any construction activity associated with the proposed Mariner 2 East pipeline project within our township.

As your due diligence may have revealed, many township residences in the area of the proposed pipeline are served by on-site wells. The township and its residents are concerned that the activity associated with the construction of the project, as well as the on-going operation of the project, may have a negative impact on the natural groundwater systems which provide drinking water to residents. We would like to provide our residents with your written plan and procedures for ensuring the integrity of the existing on-site water systems is maintained.

Our understanding is that proposed construction methods may create voids between the proposed pipeline and surrounding earth and that it is Sunoco's intention to leave those voids open and unfilled, thus creating a potential pathway for groundwater contamination. The township believes it would be appropriate for Sunoco's construction methods to include grouting those voids. Additionally, we request that Sunoco establish a benchmark of the condition and quality of each of the wells within a prescribed radius along the project and monitor those same wells for an acceptable period of time post-construction to ensure no degradation of the groundwater.

In addition, given a recent leak in neighboring Edgmont Township, which involved the transmission of a far less volatile product, Thornbury is requesting that shutoff valves be installed in the pipeline preceding the township boundary where the project enters, as well as at the boundary where the project exits Thornbury Township. This would provide an additional level of safety for both our residential and commercial property owners whose properties would be most immediately and severely impacted by a breach of the pipeline. It would also provide Sunoco with the ability to respond quickly to an emergency, mitigating possible damage.

Finally and perhaps most importantly, our Board of Supervisors has concerns over the safety record of Sunoco as presented by the Pipeline and Hazardous Material Safety Administration. We request a meeting to identify potential threats during construction and operation of the project to ensure that a viable evacuation plan is established in the event of any emergency. We would also like to meet to discuss any other safeguards appropriate to best protect our residents and their property.

If the project moves forward, the township may have additional questions and concerns to be addressed; however given the importance of those stated above we thought it would be best to have these issues addressed first. We look forward to hearing from you regarding the foregoing as soon as possible.

Sincerely,



James H. Raith
Chairman
Board of Supervisors
Thornbury Township



EXHIBIT B
**Thornbury Township Declaration of
Concern**

**THORNBURY TOWNSHIP
DELAWARE COUNTY, PENNSYLVANIA**

PROCLAMATION

A PROCLAMATION of the Board of Supervisors of Thornbury Township, Delaware County, Pennsylvania, expressing great concern to the Governor of the Commonwealth of Pennsylvania and to the Pennsylvania Department of Environmental Protection (PADEP) regarding hazardous liquids transmission pipeline projects that increase the risk of catastrophic accidents and jeopardize the health, safety and welfare of Township residents, especially when such projects provide no corresponding benefit within the Township.

WHEREAS, Sunoco Pipeline L.P. (Sunoco) has announced that it is currently transporting highly volatile liquids under pressure through Thornbury Township, a "high consequence area," using a repurposed transmission pipeline installed in the 1960s with a capacity of 70,000 barrels (2,940,000 gallons) per day (Mariner East 1); and

WHEREAS, an additional proposed Sunoco pipeline known as Mariner East 2 could, if constructed, transport through Thornbury Township an additional 275,000 barrels (11,550,000 gallons) per day of these same materials (with the potential to expand to 450,000 barrels (18,900,000 gallons) per day); and

WHEREAS, the highly volatile liquids, which are being transported through the Township for the first time by Sunoco, are, if released, gaseous, invisible, odorless, toxic, heavier than air and highly flammable; and

WHEREAS, this project has the potential to jeopardize public safety in Thornbury Township by accidental leaks, explosions, or fire; and

WHEREAS, the highly volatile liquids which Sunoco is transporting and proposes to transport through Thornbury Township are overwhelmingly intended for export to overseas markets and customers; and

WHEREAS, the transportation of these highly volatile liquids through Thornbury Township provides no direct benefit to either the municipality or its residents; and

WHEREAS, Sunoco has at least 263 reported hazardous liquid spills since 2006, according to records maintained by the federal Pipeline and Hazardous Materials Safety Administration (PHMSA).

NOW THEREFORE, BE IT PROCLAIMED by the Board of Supervisors of Thornbury Township, Delaware County, that the Township expresses deep concern about the

existing and proposed Sunoco Mariner East transmission pipelines to the Governor of the Commonwealth and the Secretary of the Pennsylvania Department of Environmental Protection. Of particular concern to the Board of Supervisors are:

I

The high level of risk to Township residents which may occur due to the nature of the highly volatile liquids being transported and proposed to be transported through the Township. This risk must be demonstrably mitigated by such measures as the development of an incident response plan which includes (but is not limited to) viable worst-case evacuation routes developed in cooperation with the Township personnel and affected residents; enhanced safety equipment and safety training for first responders; and separation of new pipelines from existing residences by a distance equal to or greater than the Potential Impact Radius (PIR) of those pipelines.

II

The inherent dangers of transporting highly volatile liquids under pressure through Thornbury Township, coupled with the fact that if released, these liquids are gaseous, invisible, odorless, toxic, heavier than air and highly flammable, requires that Sunoco have the ability to immediately stop the release once detected or reported. This risk can be demonstrably mitigated by the installation of shutoff valves both prior to the Township boundary where the transmission pipelines enter, as well as at the boundary where the transmission pipelines exit the Township. To the extent that release detection instruments can be provided to affected residents adjacent to a transmission pipeline, they should be provided and maintained by Sunoco with appropriate training provided to residents and Township personnel. This would afford an additional level of safety and notice for Township residents whose properties would be most immediately and severely impacted by a breach of the pipeline and provide Sunoco with the ability to more quickly respond to an emergency, hopefully avoiding the loss of persons and mitigating damage to property.

III

The Mariner East 2 project may threaten the private water supply of a number of Township residents as the proposed construction method has potential to create voids between the proposed pipeline and surrounding earth and that it is Sunoco's intention to leave these voids ungrouted, creating an unacceptable pathway for groundwater contamination. Proper and reasonable safeguard would be for Sunoco to establish a benchmark of the condition and quality of each of the wells within a prescribed radius along the project and monitor those same wells for an acceptable period of time post-construction to reasonably ensure no degradation of the groundwater.

IV

The Mariner East 2 project construction will disturb and alter essential elements of thoughtfully approved subdivisions. Such disturbance will adversely affect safeguards both within and without those subdivisions which have been carefully implemented in the establishment of those subdivisions. Sunoco must be required to restore such conditions and safeguards to the condition which the same were in immediately prior to the commencement of any construction.

V

To the extent that the Mariner East 2 project is approved by all necessary agencies with jurisdiction thereover, the Commonwealth must insure that such construction includes the simultaneous construction of both the proposed 20" pipeline and contemplated 16" additional pipeline, whether or not the such construction is deemed advisable or advantageous by Sunoco. To do otherwise will cause another significant period of hardship, consternation and anxiety to the residents of Township and surrounding community. This is a circumstance which is both unnecessary and easily avoided.

VI

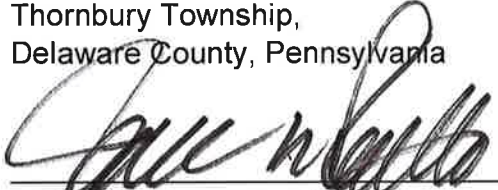
Essential to the powers of the Township, are the police powers granted by the Second Class Township Code and the power to regulate the uses and development of land by the Pennsylvania Municipalities Planning Code. Exemptions given to public utilities under each of these enabling bodies of law severely weaken the Township's ability to exercise its police powers and its ability to fully protect the health, safety and welfare of its residents and are contrary to the Commonwealth's ongoing obligation under Article 1, Section 27 of the Constitution of the Commonwealth, which provides:

"The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people."


The consequences of such exemptions squarely favor commerce over community safety and are contrary to the preservation of the public trust created by the Commonwealth Constitution. Legislation is needed to more fully empower the Township to exercise control over public utility facilities at the local level, which in turn supports the Commonwealth's responsibility toward the citizens of the Commonwealth.

PROCLAIMED by the Board of Supervisors of Thornbury Township, Delaware County, Pennsylvania, at the regular meeting of said Board held this 21st day of September, 2016.

BOARD OF SUPERVISORS
Thornbury Township,
Delaware County, Pennsylvania


James H. Raith, Chairman


J.P. Kelly, Vice Chairman


Sheri L. Perkins, Supervisor

Attest:


Geoffrey Carbutt, Secretary

(TOWNSHIP SEAL)



EXHIBIT C
Sunoco Release Record

Operator Information

Incident and Mileage Data

SUNOCO PIPELINE L.P.

(Operator ID:18718 - CURRENTLY ACTIVE OPID)

[Main Operator Report Page](#) - [Incidents and Mileage](#) - [Federal Inspection and Enforcement Data](#) - [More Pipeline Operators](#)

The reports below provide mileage data based on this operator's latest submissions to PHMSA, as well as their incident data since 2006.

The data sources for the mileages in this report are the Annual Report for Gas Distribution, Gas Transmission and Hazardous Liquid ⁽¹⁾ mileages. All mileages are for in-service pipelines and reflect data submitted to PHMSA by this operator.

The data sources for the incidents in this report are the PHMSA Flagged Incident Files⁽²⁾. Where appropriate, the table columns can be sorted by clicking the corresponding column header.

Pipeline Mileage Overview												
Incidents												
Mileage by Commodity												
Mileage by State												
All Pipeline Systems												
Hazardous Liquid Systems												
Gas Transmission Systems												
Detail												
Serious Incidents are denoted in red .												
SUNOCO PIPELINE L.P. All Incidents⁽²⁾: 2006-2018												
Date	System	City	State	County	Cause	Sub Cause	Fatalities	Injuries	Property Damage ^(A)	Gross Barrels Spilled (Haz Liq) ^(B)	Net Barrels Lost (Haz Liq) ^{(B)(C)}	Value of Product Lost ^(D)
01/15/18	HL	SINKING SPRING	PA	BERKS	NATURAL FORCE DAMAGE	TEMPERATURE	0	0	\$2,350	2	0	\$250
12/27/17	HL	WILLARD	OH	HURON	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$3,185	0	0	\$35
12/01/17	HL	ST. CLAIR	MI	ST. CLAIR	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$45,877	1	0	\$27
11/13/17	HL	CUSHING	OK	PAYNE	MATERIAL/WELD/EQUIP FAILURE	THREADED CONNECTION/COUPLING FAILURE	0	0	\$10,799	15	0	\$799
10/24/17	HL	LONGVIEW	TX	GREGG	CORROSION	INTERNAL	0	0	\$91,120	20	0	\$1,120
09/22/17	HL	HEARNE	TX	ROBERTSON	INCORRECT OPERATION	OVERFILL/OVERFLOW OF TANK/VESSEL/SUMP	0	0	\$512	0	0	\$12
09/14/17	HL	ANDREWS	TX	ANDREWS	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$545	1	0	\$45
08/08/17	HL	BROWNWOOD	TX	BROWN COUNTY	CORROSION	EXTERNAL	0	0	\$31,023	0	0	\$23
07/31/17	HL	POLLAK	TX	ANGELINA	OTHER OUTSIDE FORCE DAMAGE	VEHICLE NOT ENGAGED IN EXCAVATION	0	0	\$74,766	600	100	\$4,766
05/16/17	HL	BARNSDALL	OK	OSAGE	EXCAVATION DAMAGE	THIRD PARTY EXCAVATION DAMAGE	0	0	\$430,000	110	5	\$5,000
04/01/17	HL	MORGANTOWN	PA	BERKS	CORROSION	EXTERNAL	0	0	\$338,166	20	20	\$205
03/27/17	HL	ROSEDALE	OK	MCCLAIN	EXCAVATION DAMAGE	THIRD PARTY EXCAVATION DAMAGE	0	0	\$73,657	37	5	\$221
02/01/17	HL	CORSICANA	TX	NAVARRO	CORROSION	EXTERNAL	0	0	\$45,151	3	3	\$151
01/26/17	HL	LIBERTY	TX	LIBERTY	CORROSION	INTERNAL	0	0	\$10,025	0	0	\$25
01/13/17	HL	ASTON	PA	DELAWARE	MATERIAL/WELD/EQUIP FAILURE	THREADED CONNECTION/COUPLING FAILURE	0	0	\$39,846	16	0	\$1,546
01/10/17	HL	SHARON HILL	PA	DELAWARE	CORROSION	INTERNAL	0	0	\$23,875	1	0	\$0
12/20/16	HL	YALE	OK	CREEK	MATERIAL/WELD/EQUIP FAILURE	MANUFACTURING-RELATED	0	0	\$18,750	75	0	\$3,750
12/19/16	HL	YALE	OK	CREEK	MATERIAL/WELD/EQUIP FAILURE	MANUFACTURING-RELATED	0	0	\$15,243	5	0	\$243
12/06/16	HL	STOWELL	TX	CHAMBERS	INCORRECT OPERATION	PIPELINE/EQUIPMENT OVERPRESSURED	0	0	\$212	0	0	\$12
10/29/16	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$2,017	0	0	\$17
10/21/16	HL	GAMBLE TOWNSHIP	PA	LYCOMING	OTHER OUTSIDE FORCE DAMAGE	OTHER OUTSIDE FORCE DAMAGE	0	0	\$2,562,426	1,238	1,238	\$85,722
09/22/16	HL	GOODRICH	TX	POLK	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$19,000	0	0	\$0
09/07/16	HL	SOUR LAKE	TX	HARDIN	INCORRECT OPERATION	INCORRECT VALVE POSITION	0	0	\$5,260	3	0	\$60
08/29/16	HL	SWEETWATER	TX	NOLAN	CORROSION	EXTERNAL	0	0	\$4,017,900	8,600	6,600	\$354,900
08/16/16	HL	ALLEGHENY TOWNSHIP	PA	BLAIR	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$14,450	5	5	\$150
08/05/16	HL	CORSICANA	TX	NAVARRO	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$1,114	0	0	\$14
07/26/16	HL	TULSA	OK	TULSA	ALL OTHER CAUSES	UNKNOWN	0	0	\$0	0	0	\$0
07/25/16	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$773,395	50	10	\$395
07/20/16	HL	NEW LONDON	TX	RUSK	CORROSION	EXTERNAL	0	0	\$11,024	0	0	\$24
07/05/16	HL	NOME	TX	JEFFERSON	MATERIAL/WELD/EQUIP FAILURE	THREADED CONNECTION/COUPLING FAILURE	0	0	\$1,030	0	0	\$30
06/13/16	HL	WINNIE	TX	CHAMBERS	CORROSION	INTERNAL	0	0	\$30,500	0	0	\$0
06/06/16	HL	CORSICANA	TX	NAVARRO	CORROSION	EXTERNAL	0	0	\$49,546	1	1	\$46
05/27/16	HL	ASTON	PA	DELAWARE	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$7,743	9	9	\$123
03/03/16	HL	CENTER	TX	SHELBY	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$7,230	0	0	\$30
02/14/16	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$47,020	195	20	\$520
02/11/16	HL	CHILDRESS	TX	CHILDRESS	CORROSION	EXTERNAL	0	0	\$368,240	20	15	\$341
02/03/16	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$42,451	4	3	\$101
01/20/16	HL	WESTVILLE	NJ	GLOUCESTER	NATURAL FORCE DAMAGE	TEMPERATURE	0	0	\$13,616	1	0	\$116
11/18/15	HL	ALVORD	TX	WISE	CORROSION	INTERNAL	0	0	\$44,884	2	1	\$84
11/18/15	HL	RANGER	TX	EASTLAND	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$12,075	2	2	\$75
11/11/15	HL	TYE	TX	TAYLOR	MATERIAL/WELD/EQUIP FAILURE	OTHER EQUIPMENT FAILURE	0	0	\$6,200	30	5	\$200

Date	System	City	State	County	Cause	Sub Cause	Fatalities	Injuries	Property Damage (A)	Gross Barrels Spilled (Haz Lig) (B)	Net Barrels Lost (Haz Lig) (B)(C)	Value of Product Lost (D)
10/28/15	HL	NOME	TX	JEFFERSON	CORROSION	INTERNAL	0	0	\$274,836	5	3	\$128
10/27/15	HL	NOME	TX	JEFFERSON	CORROSION	INTERNAL	0	0	\$3,000	0	0	\$0
10/15/15	HL	GOODRICH	TX	POLK	CORROSION	INTERNAL	0	0	\$123,584	10	10	\$428
10/13/15	HL	HONEYBROOK	PA	CHESTER	INCORRECT OPERATION	INCORRECT VALVE POSITION	0	0	\$47,892	215	0	\$4,892
10/13/15	HL	DIBOLL	TX	ANGELINA	EXCAVATION DAMAGE	OPERATOR/CONTRACTOR EXCAVATION DAMAGE	0	0	\$5,026	0	0	\$26
09/22/15	HL	RANGER	TX	EASTLAND	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$3,585	2	2	\$85
09/03/15	HL	BEAUMONT	TX	JEFFERSON	OTHER OUTSIDE FORCE DAMAGE	VEHICLE NOT ENGAGED IN EXCAVATION	0	0	\$150,001	0	0	\$1
09/01/15	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$5,045	1	1	\$45
08/21/15	HL	NOME	TX	JEFFERSON	CORROSION	INTERNAL	0	0	\$22,000	1	0	\$0
07/26/15	HL	BEAUMONT	TX	JEFFERSON	MATERIAL/WELD/EQUIP FAILURE	THREADED CONNECTION/COUPLING FAILURE	0	0	\$5,000	1	0	\$0
07/16/15	HL	MAYSVILLE	OK	GARVIN	INCORRECT OPERATION	OVERFILL/OVERFLOW OF TANK/VESSEL/SUMP	0	0	\$2,800	1	0	\$50
07/09/15	HL	CORSICANA	TX	NAVARRO	CORROSION	EXTERNAL	0	0	\$41,676	4	4	\$225
06/23/15	HL	CORSICANA	TX	NAVARRO	INCORRECT OPERATION	OTHER INCORRECT OPERATION	0	0	\$33,022	0	0	\$22
06/14/15	HL	OREGON	OH	LUCAS	MATERIAL/WELD/EQUIP FAILURE	DEFECTIVE OR LOOSE TUBING/FITTING	0	0	\$2,540	0	0	\$20
05/31/15	HL	DIBOLL	TX	ANGELINA	CORROSION	INTERNAL	0	0	\$127,056	60	10	\$568
05/28/15	HL	CORSICANA	TX	NAVARRO	INCORRECT OPERATION	INCORRECT VALVE POSITION	0	0	\$30,163	20	3	\$163
05/12/15	HL	WORTHAM	TX	FREESTON	NATURAL FORCE DAMAGE	LIGHTNING	0	0	\$19,000	0	0	\$0
05/11/15	HL	CORSICANA	TX	NAVARRO	NATURAL FORCE DAMAGE	HEAVY RAINS/FLOODS	0	0	\$2,212,822	650	20	\$1,110
05/08/15	HL	DAYTON	TX	LIBERTY	CORROSION	EXTERNAL	0	0	\$524,139	3	3	\$315
04/20/15	HL	SINKING SPRINGS	PA	BERKS	INCORRECT OPERATION	OTHER INCORRECT OPERATION	0	0	\$530	0	0	\$30
04/10/15	HL	GLEN MILLS	PA	DELAWARE	CORROSION	EXTERNAL	0	0	\$491,574	0	0	\$24
03/26/15	HL	ASTON	PA	DELAWARE	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$3,530	0	0	\$30
03/26/15	HL	WHEELER	TX	WHEELER	MATERIAL/WELD/EQUIP FAILURE	OTHER EQUIPMENT FAILURE	0	0	\$2,550	0	0	\$5
03/22/15	HL	CUSHING	OK	PAYNE	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$4,000	8	0	\$0
03/02/15	HL	SHARON HILL	PA	DELAWARE	NATURAL FORCE DAMAGE	TEMPERATURE	0	0	\$41,100	297	0	\$0
03/01/15	HL	ASTON	PA	DELAWARE	MATERIAL/WELD/EQUIP FAILURE	THREADED CONNECTION/COUPLING FAILURE	0	0	\$3,515	0	0	\$15
01/14/15	HL	BEAUMONT	TX	JEFFERSON	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$670,000	30	30	\$1,431
11/19/14	HL	WHITE OAK	TX	GREGG	INCORRECT OPERATION	INCORRECT INSTALLATION	0	0	\$49,508	1	0	\$50
11/04/14	HL	HENDERSON	TX	RUSK	INCORRECT OPERATION	INCORRECT VALVE POSITION	0	0	\$500	4	0	\$0
11/01/14	HL	KINGFISHER	OK	KINGFISHER	MATERIAL/WELD/EQUIP FAILURE	MANUFACTURING-RELATED	0	0	\$424,000	15	0	\$1,000
10/18/14	HL	SOUR LAKE	TX	HARDIN	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$6,538	15	3	\$238
10/09/14	HL	ALEX	OK	GRADY	CORROSION	INTERNAL	0	0	\$8,082	1	1	\$82
09/25/14	HL	OREGON	OH	LUCAS	INCORRECT OPERATION	OTHER INCORRECT OPERATION	0	0	\$5,200	1	1	\$100
08/19/14	HL	NEDERLAND	TX	JEFFERSON	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$671	0	0	\$71
05/20/14	HL	EVANT	TX	CORYELL	CORROSION	INTERNAL	0	0	\$47,198	2	2	\$198
04/24/14	HL	BEGGS	OK	OKMULGEE	CORROSION	INTERNAL	0	0	\$30,296	3	0	\$296
04/02/14	HL	ZEPHYR	TX	BROWN	MATERIAL/WELD/EQUIP FAILURE	OTHER EQUIPMENT FAILURE	0	0	\$7,288	3	3	\$288
03/28/14	HL	ALEX	OK	GRADY	INCORRECT OPERATION	INCORRECT INSTALLATION	0	0	\$1,493	4	0	\$393
03/27/14	HL	CORSICANA	TX	NAVARRO	MATERIAL/WELD/EQUIP FAILURE	DEFECTIVE OR LOOSE TUBING/FITTING	0	0	\$2,000	1	0	\$0
03/14/14	HL	CORSICANA	TX	NAVARRO	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$2,950	0	0	\$50
03/02/14	HL	CORSICANA	TX	NAVARRO	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$3,460	3	0	\$60
02/24/14	HL	LONGVIEW	TX	GREGG	CORROSION	INTERNAL	0	0	\$206,471	20	10	\$1,489
02/21/14	HL	LONGVIEW	TX	GREGG	CORROSION	INTERNAL	0	0	\$41,885	15	5	\$494
02/18/14	HL	WHITE OAK	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	FAILURE OF EQUIPMENT BODY	0	0	\$7,000	0	0	\$0
01/22/14	HL	GARY	TX	PANOLA	CORROSION	EXTERNAL	0	0	\$378,368	400	133	\$14,356
01/13/14	HL	LONGVIEW	TX	GREGG	CORROSION	INTERNAL	0	0	\$47,741	15	5	\$441
12/28/13	HL	EDMOND	OK	OKLAHOMA	CORROSION	INTERNAL	0	0	\$336,047	138	97	\$9,312
12/28/13	HL	EDMOND	OK	OKLAHOMA	CORROSION	INTERNAL	0	0	\$39,928	47	33	\$3,193
12/27/13	HL	STOWELL	TX	CHAMBERS	MATERIAL/WELD/EQUIP FAILURE	THREADED CONNECTION/COUPLING FAILURE	0	0	\$478	0	0	\$0
12/20/13	HL	COAL TOWNSHIP	PA	NORTHUMBERLAND	CORROSION	EXTERNAL	0	0	\$1,069,253	0	0	\$8
12/05/13	HL	CUSHING	OK	PAYNE	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$9,530	7	0	\$0
11/30/13	HL	STOWELL	TX	CHAMBERS	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$1,418	0	0	\$21
11/14/13	HL	EDMOND	OK	OKLAHOMA	CORROSION	INTERNAL	0	0	\$19,632	7	7	\$632
11/13/13	HL	DIBOLL	TX	ANGELINA	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$3,450	1	1	\$100
10/05/13	HL	TYLER	TX	SMITH	CORROSION	EXTERNAL	0	0	\$266,257	30	10	\$1,003
09/24/13	HL	TEMPLE	TX	BELL	INCORRECT OPERATION	OTHER INCORRECT OPERATION	0	0	\$45,834	5	5	\$498
09/04/13	HL	ALEX	OK	GRADY	CORROSION	INTERNAL	0	0	\$200	1	0	\$100
08/19/13	HL	ASTON	PA	DELEWARE COUNTY	CORROSION	EXTERNAL	0	0	\$4,620	0	0	\$120
08/09/13	HL	LIBERTY	TX	LIBERTY	CORROSION	INTERNAL	0	0	\$6,553	0	0	\$53
07/11/13	HL	OREGON	OH	LUCAS	MATERIAL/WELD/EQUIP FAILURE	CONSTRUCTION, INSTALLATION OR FABRICATION-RELATED	0	0	\$55,540	0	0	\$0
06/25/13	HL	RINGGOLD	TX	MONTAQUE	MATERIAL/WELD/EQUIP FAILURE	DEFECTIVE OR LOOSE TUBING/FITTING	0	0	\$199,740	150	60	\$5,505
05/20/13	HL	UPPER CHICHESTER	PA	DELAWARE	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$45,672	5	0	\$672
05/14/13	HL	KELLER	TX	TARRANT	CORROSION	INTERNAL	0	0	\$13,521	2	0	\$46
05/07/13	HL	SPRING TOWNSHIP	PA	BERKS	CORROSION	EXTERNAL	0	0	\$7,661	0	0	\$0
04/23/13	HL	CORSICANA	TX	NAVARRO	INCORRECT OPERATION	OTHER INCORRECT OPERATION	0	0	\$24,015	4	4	\$343
04/03/13	HL	CORSICANA	TX	NAVARRO	MATERIAL/WELD/EQUIP FAILURE	THREADED CONNECTION/COUPLING FAILURE	0	0	\$2,617	1	0	\$67
03/20/13	HL	CORSICANA	TX	NAVARRO	MATERIAL/WELD/EQUIP FAILURE	THREADED CONNECTION/COUPLING FAILURE	0	0	\$133,107	300	140	\$12,530
03/11/13	HL	MIDLOTHIAN	TX	ELLIS	CORROSION	EXTERNAL	0	0	\$216,515	50	38	\$3,363
03/11/13	HL	DEVERS	TX	LIBERTY	MATERIAL/WELD/EQUIP FAILURE	OTHER EQUIPMENT FAILURE	0	0	\$29,459	37	17	\$1,549
02/28/13	HL	CIMMARON	OK	LOGAN	CORROSION	INTERNAL	0	0	\$214,538	75	0	\$0
02/23/13	HL	CHESTER	TX	TYLER	CORROSION	INTERNAL	0	0	\$3,634,605	550	50	\$4,488
02/14/13	HL	SOUR LAKE	TX	HARDIN	INCORRECT OPERATION	PIPELINE/EQUIPMENT OVERPRESSURED	0	0	\$38,197	0	0	\$30
02/09/13	HL	BRECKENRIDGE	TX	STEPHENS	CORROSION	INTERNAL	0	0	\$117,898	15	13	\$1,199
02/08/13	HL	CHESTER	TX	TYLER	CORROSION	INTERNAL	0	0	\$270,046	7	0	\$46

Date	System	City	State	County	Cause	Sub Cause	Fatalities	Injuries	Property Damage (A)	Gross Barrels Spilled (Haz Lig) (B)	Net Barrels Lost (Haz Lig) (B)(C)	Value of Product Lost (D)
02/07/13	HL	CHESTER	TX	TYLER	CORROSION	INTERNAL	0	0	\$37,089	3	2	\$185
02/06/13	HL	RANGER	TX	STEPHENS	CORROSION	INTERNAL	0	0	\$163,973	25	25	\$2,325
02/05/13	HL	BEAUMONT	TX	JEFFERSON	MATERIAL/WELD/EQUIP FAILURE	THREADED CONNECTION/COUPLING FAILURE	0	0	\$585	0	0	\$45
02/03/13	HL	BRECKENRIDGE	TX	STEPHENS	CORROSION	INTERNAL	0	0	\$115,462	25	25	\$2,356
01/24/13	HL	RANGER	TX	STEPHENS	CORROSION	INTERNAL	0	0	\$734,668	350	230	\$21,275
01/07/13	HL	COLMESNEIL	TX	TYLER	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$45,029	10	10	\$897
01/04/13	HL	SINKING SPRING	PA	BERKS	MATERIAL/WELD/EQUIP FAILURE	MANUFACTURING-RELATED	0	0	\$225,400	12	0	\$1,400
01/02/13	HL	PADACUH	TX	COTTLE	CORROSION	EXTERNAL	0	0	\$37,308	2	2	\$179
12/21/12	HL	WAYNE	MI	WAYNE	INCORRECT OPERATION	OTHER INCORRECT OPERATION	0	0	\$1,216,083	3	0	\$300
12/19/12	HL	RINGGOLD	TX	MONTAGUE	CORROSION	INTERNAL	0	0	\$2,880	1	0	\$80
12/16/12	HL	ASTON	PA	DELEWARE	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$11,000	3	0	\$0
11/12/12	HL	SARATOGA	TX	HARDIN	CORROSION	INTERNAL	0	0	\$12,041	0	0	\$41
10/01/12	HL	WARREN	TX	TYLER	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$7,024	0	0	\$24
09/26/12	HL	WORTHAM	TX	ROBERTSON	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$24,598	13	3	\$276
08/19/12	HL	SHARON HILL	PA	DELAWARE	CORROSION	INTERNAL	0	0	\$46,000	4	0	\$0
08/15/12	HL	SOUR LAKE	TX	HARDIN	CORROSION	EXTERNAL	0	0	\$12,453	3	3	\$300
08/03/12	HL	SOUR LAKE	TX	HARDIN	CORROSION	INTERNAL	0	0	\$5,040	0	0	\$40
07/12/12	HL	KURTEN	TX	BRAZOS	CORROSION	EXTERNAL	0	0	\$18,000	0	0	\$0
07/07/12	HL	KURTEN	TX	BRAZOS	CORROSION	EXTERNAL	0	0	\$18,162	2	2	\$162
07/06/12	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$1,137	0	0	\$12
06/20/12	HL	LONGVIEW	TX	GREGG	CORROSION	INTERNAL	0	0	\$2,909	0	0	\$9
05/18/12	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$10,454	10	2	\$176
05/14/12	HL	BIG SPRING	TX	HOWARD	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$4,020	0	0	\$20
05/10/12	HL	CHILDRESS	TX	CHILDRESS	CORROSION	EXTERNAL	0	0	\$259,533	20	20	\$1,870
04/08/12	HL	SOUR LAKE	TX	HARDIN	INCORRECT OPERATION	OVERFILL/OVERFLOW OF TANK/VESSEL/SUMP	0	0	\$25,060	5	5	\$500
04/02/12	HL	HEARNE	TX	ROBERTSON	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$1,800	4	0	\$0
03/06/12	HL	STOWELL	TX	CHAMBERS	CORROSION	INTERNAL	0	0	\$18,160	0	0	\$50
03/02/12	HL	HULL	TX	LIBERTY	CORROSION	INTERNAL	0	0	\$15,012	0	0	\$12
02/27/12	HL	MAYSVILLE	OK	GARVIN	CORROSION	INTERNAL	0	0	\$4,253	2	0	\$53
02/09/12	HL	WHITE OAK	TX	GREGG	INCORRECT OPERATION	INCORRECT INSTALLATION	0	0	\$2,034	0	0	\$34
01/12/12	HL	WELLINGTON	OH	LORRAIN	EXCAVATION DAMAGE	PREVIOUS DAMAGE DUE TO EXCAVATION	0	0	\$17,904,594	1,950	1,221	\$3,289
01/11/12	HL	HULL	TX	LIBERTY	CORROSION	INTERNAL	0	0	\$23,129	2	2	\$292
01/06/12	HL	ROBERT LEE	TX	COKE	CORROSION	INTERNAL	0	0	\$89,622	117	117	\$11,466
12/29/11	HL	HAWLEY	TX	JONES	MATERIAL/WELD/EQUIP FAILURE	OTHER EQUIPMENT FAILURE	0	0	\$3,612	2	2	\$192
12/20/11	HL	SARATOGA	TX	HARDIN	INCORRECT OPERATION	OVERFILL/OVERFLOW OF TANK/VESSEL/SUMP	0	0	\$5,434	2	2	\$242
12/11/11	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$7,696	0	0	\$96
12/01/11	HL	RULE	TX	HASKELL	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$4,185	0	0	\$35
11/02/11	HL	BIG SPRING	TX	HOWARD	MATERIAL/WELD/EQUIP FAILURE	DEFECTIVE OR LOOSE TUBING/FITTING	0	0	\$45	0	0	\$45
10/13/11	HL	TEMPLE	TX	BELL	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$10	0	0	\$10
10/04/11	HL	TULSA	OK	TULSA	CORROSION	INTERNAL	0	0	\$12,257	25	0	\$0
10/04/11	HL	SOUR LAKE	TX	HARDIN	CORROSION	INTERNAL	0	0	\$3,308	0	0	\$36
09/26/11	HL	ASTON	PA	PA	OTHER OUTSIDE FORCE DAMAGE	OTHER OUTSIDE FORCE DAMAGE	0	0	\$365,591	78	0	\$0
08/31/11	HL	PRICE	TX	RUSK	CORROSION	INTERNAL	0	0	\$10,904	2	2	\$171
08/29/11	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$27,598	4	3	\$251
07/22/11	HL	DIBOLL	TX	ANGELINA	INCORRECT OPERATION	PIPELINE/EQUIPMENT OVERPRESSURED	0	0	\$3,575	1	1	\$144
04/27/11	HL	RINGGOLD	TX	MONTAGUE	CORROSION	INTERNAL	0	0	\$49,832	8	2	\$219
04/19/11	HL	LONGVIEW	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$1,414	1	1	\$105
02/14/11	HL	WYNNEWOOD	OK	MURRAY	CORROSION	INTERNAL	0	0	\$67,021	78	58	\$4,713
02/13/11	HL	DIBOLL	TX	ANGELINA	INCORRECT OPERATION	OVERFILL/OVERFLOW OF TANK/VESSEL/SUMP	0	0	\$5,769	4	1	\$83
02/12/11	HL	WHITE OAK	TX	GREGG	CORROSION	EXTERNAL	0	0	\$126,058	40	16	\$1,312
02/10/11	HL	LONGVIEW	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$18,428	0	0	\$42
02/08/11	HL	SHARON HILL	PA	DELAWARE	CORROSION	INTERNAL	0	0	\$257,250	38	0	\$0
01/19/11	HL	MAYSVILLE	OK	GARVIN	CORROSION	INTERNAL	0	0	\$816,730	1,250	1,035	\$90,304
01/03/11	HL	PAMPA	TX	GRAY	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$2,555	0	0	\$44
12/04/10	HL	LIVINGSTON	TX	POLK	CORROSION	INTERNAL	0	0	\$155,340	75	45	\$3,825
11/20/10	HL	NEW WAVERLY	TX	WALKER	MATERIAL/WELD/EQUIP FAILURE	CONSTRUCTION, INSTALLATION OR FABRICATION-RELATED	0	0	\$438,060	100	100	\$8,500
11/15/10	HL	DIBOLL	TX	ANGELINA	INCORRECT OPERATION	OVERFILL/OVERFLOW OF TANK/VESSEL/SUMP	0	0	\$19,434	15	5	\$405
11/12/10	HL	ENID	OK	GARFIELD	INCORRECT OPERATION	INCORRECT VALVE POSITION	0	0	\$7,368	0	0	\$40
10/06/10	HL	ST. CLAIR	MI	ST. CLAIR	CORROSION	EXTERNAL	0	0	\$75,000	1	0	\$0
09/30/10	HL	THOMAS	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$3,982	1	1	\$77
09/28/10	HL	BEAUMONT	TX	JEFFERSON	EXCAVATION DAMAGE	OPERATOR/CONTRACTOR EXCAVATION DAMAGE	0	0	\$1,020	0	0	\$20
09/27/10	HL	BEAUMONT	TX	JEFFERSON	INCORRECT OPERATION	INCORRECT VALVE POSITION	0	0	\$8,913	1	0	\$0
09/24/10	HL	BRECKENRIDGE	TX	STEPHENS	INCORRECT OPERATION	OVERFILL/OVERFLOW OF TANK/VESSEL/SUMP	0	0	\$237	2	1	\$37
09/16/10	HL	ANSON	TX	JONES	MATERIAL/WELD/EQUIP FAILURE	CONSTRUCTION, INSTALLATION OR FABRICATION-RELATED	0	0	\$18,865	0	0	\$35
08/22/10	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$398,039	100	98	\$6,860
07/31/10	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$19,227	3	2	\$227
07/11/10	HL	THOMAS	TX	GREGG	CORROSION	EXTERNAL	0	0	\$43,361	6	6	\$414
07/04/10	HL	DRUMRIGHT	OK	CREEK	CORROSION	INTERNAL	0	0	\$29,411	1	0	\$69
06/16/10	HL	COLMESNEIL	TX	TYLER	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$5,011	0	0	\$11
06/10/10	HL	DOUGLAS	TX	NACOGDOCHES	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$2,536	0	0	\$36
06/09/10	HL	HOUSTON	TX	HARRIS	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$16,534	3	3	\$0
05/27/10	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$9,499	0	0	\$30
05/19/10	HL	LONGVIEW	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$6,868	1	1	\$67
04/10/10	HL	CASHION	OK	LOGAN COUNTY	MATERIAL/WELD/EQUIP FAILURE	CONSTRUCTION, INSTALLATION OR FABRICATION-RELATED	0	0	\$167,904	0	0	\$2

Date	System	City	State	County	Cause	Sub Cause	Fatalities	Injuries	Property Damage (A)	Gross Barrels Spilled (Haz Lig) (B)	Net Barrels Lost (Haz Lig) (B)(C)	Value of Product Lost (D)
04/05/10	HL	PHAROAH	OK	OKFUSKEE	MATERIAL/WELD/EQUIP FAILURE	PUMP OR PUMP-RELATED EQUIPMENT	0	0	\$7,815	3	0	\$249
03/15/10	HL	WHITE OAK	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	MALFUNCTION OF CONTROL/RELIEF EQUIPMENT	0	0	\$11,497	0	0	\$46
03/15/10	HL	COMYN	TX	COMANCHE	MATERIAL/WELD/EQUIP FAILURE	NON-THREADED CONNECTION FAILURE	0	0	\$765	0	0	\$10
03/09/10	HL	LONGVIEW	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	THREADED CONNECTION/COUPLING FAILURE	0	0	\$5,039	1	0	\$39
03/09/10	HL	CORSICANA	TX	NAVARRO	MATERIAL/WELD/EQUIP FAILURE	CONSTRUCTION, INSTALLATION OR FABRICATION-RELATED	0	0	\$26,064	1	0	\$78
02/20/10	HL	LONGVIEW	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	OTHER EQUIPMENT FAILURE	0	0	\$93,513	8	2	\$152
12/31/09	HL	LONGVIEW	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$500	1	0	\$0
12/18/09	HL	CORSICANA	TX	NAVARRO	INCORRECT OPERATION	INCORRECT OPERATION	0	0	\$16,299	103	14	\$994
12/17/09	HL	PORT ARTHUR	TX	JEFFERSON	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$2,533	0	0	\$33
11/24/09	HL	CORSICANA	TX	NAVARRO	INCORRECT OPERATION	INCORRECT OPERATION	0	0	\$18,378	8	6	\$444
11/19/09	HL	CORSICANA	TX	NAVARRO	CORROSION	UNSPECIFIED CORROSION	0	0	\$28,553	0	0	\$35
11/05/09	HL	KILGORE	TX	GREGG	INCORRECT OPERATION	UNSPECIFIED INCORRECT OPERATION	0	0	\$1,000	2	0	\$0
10/09/09	HL	LONGVIEW	TX	GREGG	NATURAL FORCE DAMAGE	HEAVY RAINS/FLOODS	0	0	\$31,500	2	1	\$65
09/16/09	HL	TIFFIN	OH	SENECA	EXCAVATION DAMAGE	THIRD PARTY EXCAVATION DAMAGE	0	0	\$505,799	671	163	\$52,100
09/02/09	HL	LONGVIEW	TX	GREGG	CORROSION	UNSPECIFIED CORROSION	0	0	\$15,000	4	0	\$0
08/24/09	HL	MONT BELVIEU	TX	CHAMBERS	CORROSION	INTERNAL	0	0	\$529,003	2,500	1,613	\$96,780
08/17/09	HL	ENID	OK	GARFIELD	CORROSION	UNSPECIFIED CORROSION	0	0	\$5,067	1	1	\$67
08/03/09	HL	BEAUMONT	TX	JEFFERSON	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$1,500	1	0	\$0
07/05/09	HL	CORSICANA	TX	NAVARRO	CORROSION	UNSPECIFIED CORROSION	0	0	\$17,560	2	2	\$120
05/31/09	HL	LONGVIEW	TX	GREGG	CORROSION	UNSPECIFIED CORROSION	0	0	\$13,158	3	3	\$165
05/29/09	HL	LONGVIEW	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$5,116	1	1	\$55
05/08/09	HL	ASTON	PA	DELAWARE	MATERIAL/WELD/EQUIP FAILURE	RUPTURED OR LEAKING SEAL/PUMP PACKING	0	0	\$337,398	59	0	\$5,575
05/04/09	HL	LONGVIEW	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	RUPTURED OR LEAKING SEAL/PUMP PACKING	0	0	\$44,966	248	2	\$110
05/01/09	HL	COMYN	TX	COMANCHE	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$7,555	4	1	\$55
04/30/09	HL	VALLEY MILLS	TX	BOSQUE	CORROSION	EXTERNAL	0	0	\$28,190	20	15	\$690
04/24/09	HL	ASTON	PA	DELAWARE	INCORRECT OPERATION	UNSPECIFIED INCORRECT OPERATION	0	0	\$5,125	0	0	\$25
03/16/09	HL	LORENA	TX	MCLENNAN	CORROSION	INTERNAL	0	0	\$653,593	1,400	730	\$38,000
02/09/09	HL	LONGVIEW	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$1,250	0	0	\$0
01/17/09	HL	CUSHING	OK	PAYNE	CORROSION	INTERNAL	0	0	\$13,794	10	5	\$190
12/30/08	HL	COLUMBUS	MI	ST. CLAIR	MATERIAL/WELD/EQUIP FAILURE	BUTT WELD	0	0	\$198,979	30	9	\$2,000
12/17/08	HL	LINDEN	NJ	UNION	CORROSION	EXTERNAL	0	0	\$71,550	0	0	\$50
12/05/08	HL	MARYSVILLE	MI	ST. CLAIR	CORROSION	INTERNAL	0	0	\$84,420	10	3	\$420
11/25/08	HL	MURRYSVILLE	PA	WESTMORELAND	INCORRECT OPERATION	INCORRECT OPERATION	0	0	\$1,124,000	280	160	\$14,000
11/17/08	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$20,300	15	5	\$300
09/23/08	HL	KILGORE	TX	GREGG	CORROSION	UNSPECIFIED CORROSION	0	0	\$27,451	1	1	\$100
08/04/08	HL	LONGVIEW	TX	GREGG	CORROSION	INTERNAL	0	0	\$9,392	6	1	\$113
07/17/08	HL	ENID	OK	GARFIELD	MATERIAL/WELD/EQUIP FAILURE	THREADS STRIPPED, BROKEN PIPE COUPLING	0	0	\$32,145	5	5	\$600
06/26/08	HL	CLEVELAND	TX	SAN JACINTO	MATERIAL/WELD/EQUIP FAILURE	FILLET WELD	0	0	\$197,601	15	2	\$262
06/11/08	HL	CORSICANA	TX	NAVARRO	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$4,524	4	4	\$524
05/28/08	HL	MCGREGOR	TX	MCLENNAN	INCORRECT OPERATION	UNSPECIFIED INCORRECT OPERATION	0	0	\$500	0	0	\$0
05/07/08	HL	DAISETTA	TX	HARDIN	NATURAL FORCE DAMAGE	EARTH MOVEMENT	0	0	\$100,069	10	10	\$1,120
05/03/08	HL	ENID	OK	GARFIELD	INCORRECT OPERATION	UNSPECIFIED INCORRECT OPERATION	0	0	\$30,036	4	1	\$122
04/25/08	HL	ASTON	PA	DELAWARE	INCORRECT OPERATION	INCORRECT OPERATION	0	0	\$14,500	10	1	\$0
04/22/08	HL	SOUR LAKE	TX	HARDIN	CORROSION	INTERNAL	0	0	\$24,050	20	2	\$250
04/09/08	HL	LONGVIEW	TX	GREGG	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$850	2	1	\$50
03/31/08	HL	CORSICANA	TX	NAVARRO	CORROSION	INTERNAL	0	0	\$30,000	100	50	\$5,000
03/16/08	HL	PHILADELPHIA	PA	PHILADELPHIA	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$18,000	0	0	\$100
03/13/08	HL	DIBOLL	TX	ANGELINA	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED MATERIAL/WELD FAILURE	0	0	\$9,567	0	0	\$50
03/04/08	HL	DRUMRIGHT	OK	CREEK	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$525	0	0	\$25
02/07/08	HL	PAULSBORO	NJ	GLOUCESTER	INCORRECT OPERATION	INCORRECT OPERATION	0	0	\$12,550	12	0	\$1,250
01/22/08	HL	MCGREGOR	TX	MCLENNAN	INCORRECT OPERATION	UNSPECIFIED INCORRECT OPERATION	0	0	\$589	1	1	\$89
01/05/08	HL	DIBOLL	TX	ANGELINA	MATERIAL/WELD/EQUIP FAILURE	JOINT/FITTING/COMPONENT	0	0	\$263,186	50	1	\$86
12/20/07	HL	FAIRVIEW	TX	WISE	CORROSION	INTERNAL	0	0	\$108,842	2	2	\$176
11/19/07	HL	LONGVIEW	TX	GREGG	CORROSION	INTERNAL	0	0	\$202,168	75	5	\$440
11/10/07	HL	NEDERLAND	TX	JEFFERSON	OTHER OUTSIDE FORCE DAMAGE	INTENTIONAL DAMAGE	0	0	\$62,400	30	30	\$2,400
10/18/07	HL	BEGGS	OK	OKMULGEE	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$620	0	0	\$20
09/26/07	HL	CUSHING	OK	PAYNE	CORROSION	INTERNAL	0	0	\$8,070	20	1	\$70
09/14/07	HL	WELLS	TX	ANGELINA	CORROSION	EXTERNAL	0	0	\$192,470	30	7	\$504
08/27/07	HL	RANGER	TX	EASTLAND	CORROSION	UNSPECIFIED CORROSION	0	0	\$6,150	3	2	\$150
08/05/07	HL	LUINA PIER	MI	MONROE	INCORRECT OPERATION	INCORRECT OPERATION	0	0	\$12,800	5	0	\$500
06/27/07	HL	ELMORE CITY	OK	GARVIN	OTHER OUTSIDE FORCE DAMAGE	INTENTIONAL DAMAGE	0	0	\$48,000	50	15	\$1,000
06/20/07	HL	LIVINGSTON	TX	POLK	EXCAVATION DAMAGE	THIRD PARTY EXCAVATION DAMAGE	0	0	\$121,750	100	10	\$750
06/18/07	HL	CORSICANA	TX	NAVARRO	CORROSION	UNSPECIFIED CORROSION	0	0	\$5,000	4	0	\$0
06/14/07	HL	CUSHING	OK	PAYNE	CORROSION	INTERNAL	0	0	\$107,700	25	15	\$1,700
06/13/07	HL	CORSICANA	TX	NAVARRO	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$1,500	4	0	\$0
05/21/07	HL	ARLINGTON	TX	TARRANT	EXCAVATION DAMAGE	UNSPECIFIED EXCAVATION DAMAGE	0	0	\$42,040	0	0	\$40
05/16/07	HL	SHAMOKIN	PA	NORTHUMBERLAND	EXCAVATION DAMAGE	THIRD PARTY EXCAVATION DAMAGE	0	1	\$2,826,000	1,502	1,287	\$147,000
04/15/07	HL	SINKING SPRING	PA	BERKS	CORROSION	EXTERNAL	0	0	\$20,650	7	0	\$650
04/02/07	HL	HAWLEY	TX	JONES	CORROSION	INTERNAL	0	0	\$31,240	285	20	\$1,240
03/16/07	HL	LONGVIEW	TX	GREGG	CORROSION	UNSPECIFIED CORROSION	0	0	\$35,100	0	0	\$1
02/26/07	HL	TAYLOR	MI	WAYNE	NATURAL FORCE DAMAGE	UNSPECIFIED NATURAL FORCE DAMAGE	0	0	\$2,300	3	1	\$300
02/24/07	HL	TULSA	OK	TULSA	MATERIAL/WELD/EQUIP FAILURE	RUPTURED OR LEAKING SEAL/PUMP PACKING	0	0	\$15,060	12	1	\$60
02/18/07	HL	SHARON HILL	PA	DELAWARE	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$3,060	0	0	\$60
02/10/07	HL	ALVORD	TX	WISE	CORROSION	UNSPECIFIED CORROSION	0	0	\$500	4	0	\$0

Date	System	City	State	County	Cause	Sub Cause	Fatalities	Injuries	Property Damage (A)	Gross Barrels Spilled (Haz Lig) (B)	Net Barrels Lost (Haz Lig) (B)(C)	Value of Product Lost (D)
02/07/07	HL	ROMULUS	MI	WAYNE	NATURAL FORCE DAMAGE	TEMPERATURE	0	0	\$30,000	14	1	\$1,200
02/06/07	HL	ARLINGTON	TX	TARRANT	EXCAVATION DAMAGE	THIRD PARTY EXCAVATION DAMAGE	0	0	\$571,294	518	94	\$5,640
01/29/07	HL	CORSICANA	TX	NAVARRO	CORROSION	UNSPECIFIED CORROSION	0	0	\$8,120	2	0	\$120
12/27/06	HL	SYLVANIA	PA	BRADFORD	MATERIAL/WELD/EQUIP FAILURE	RUPTURED OR LEAKING SEAL/PUMP PACKING	0	0	\$6,000	0	0	\$0
12/15/06	HL	BRONTE	TX	COKE	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED MATERIAL/WELD FAILURE	0	0	\$6,700	4	4	\$200
12/04/06	HL	CHILTON	TX	FALLS	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$2,100	3	0	\$0
11/14/06	HL	MARYSVILLE	MI	ST. CLAIR	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$6,100	0	0	\$100
11/09/06	HL	KILGORE	TX	GREGG	EXCAVATION DAMAGE	THIRD PARTY EXCAVATION DAMAGE	0	0	\$136,000	350	20	\$18,000
10/05/06	HL	ASTON	PA	DELAWARE	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$10,000	0	0	\$50
09/26/06	HL	TOLEDO	OH	LUCAS	MATERIAL/WELD/EQUIP FAILURE	JOINT/FITTING/COMPONENT	0	0	\$54,020	0	0	\$20
09/06/06	HL	KILGORE	TX	GREGG	CORROSION	UNSPECIFIED CORROSION	0	0	\$415	0	0	\$0
08/29/06	HL	NEWARK	NJ	ESSEX	CORROSION	EXTERNAL	0	0	\$101,725	19	0	\$2,000
08/21/06	HL	HAWLEY	TX	JONES	CORROSION	INTERNAL	0	0	\$49,920	100	65	\$4,420
08/13/06	HL	TULSA	OK	TULSA	ALL OTHER CAUSES	UNKNOWN	0	0	\$2,350	2	1	\$100
07/17/06	HL	CUSHING	OK	PAYNE	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$1,285	0	0	\$35
06/19/06	HL	TYE	TX	TAYLOR	CORROSION	INTERNAL	0	0	\$183,000	500	333	\$30,000
06/15/06	HL	SEMINOLE	OK	SEMINOLE	EXCAVATION DAMAGE	THIRD PARTY EXCAVATION DAMAGE	0	0	\$4,200	200	0	\$0
05/31/06	HL	DUBLIN	TX	ERATH	CORROSION	EXTERNAL	0	0	\$38,725	15	15	\$725
05/31/06	HL	DUBLIN	TX	ERATH	CORROSION	EXTERNAL	0	0	\$23,725	10	10	\$725
05/04/06	HL	CORSICANA	TX	NAVARRO	CORROSION	UNSPECIFIED CORROSION	0	0	\$2,350	3	3	\$150
05/01/06	HL	HAWLEY	TX	JONES	CORROSION	INTERNAL	0	0	\$12,200	15	10	\$500
04/29/06	HL	TULSA	OK	TULSA	CORROSION	INTERNAL	0	0	\$25,698	63	3	\$698
04/25/06	HL	ALANREED	TX	DONLEY	CORROSION	EXTERNAL	0	0	\$18,000	15	5	\$300
04/03/06	HL	CORSICANA	TX	NAVARRO	INCORRECT OPERATION	UNSPECIFIED INCORRECT OPERATION	0	0	\$525	0	0	\$25
03/21/06	HL	KELLER	TX	TARRANT	NATURAL FORCE DAMAGE	UNSPECIFIED NATURAL FORCE DAMAGE	0	0	\$1,006	0	0	\$6
03/20/06	HL	RINGGOLD	TX	MONTAGUE	MATERIAL/WELD/EQUIP FAILURE	UNSPECIFIED EQUIPMENT FAILURE	0	0	\$1,525	0	0	\$25
03/09/06	HL	TAYLOR	MI	WAYNE	NATURAL FORCE DAMAGE	UNSPECIFIED NATURAL FORCE DAMAGE	0	0	\$1,510	0	0	\$10
02/24/06	HL		TX	EASTLAND	CORROSION	INTERNAL	0	0	\$34,100	10	10	\$600
02/24/06	HL		TX	EASTLAND	CORROSION	INTERNAL	0	0	\$44,100	35	35	\$2,100
02/21/06	HL		TX	EASTLAND	CORROSION	INTERNAL	0	0	\$95,000	75	30	\$18,000
01/07/06	HL	TOLEDO	OH	LUCAS	CORROSION	EXTERNAL	0	0	\$94,900	1	0	\$200
Totals							0	1	\$56,652,909	28,497	16,697	\$1,167,240

Notes

- A. For years 2002 and later, property damage is estimated as the sum of all public and private costs reported in the 30-day incident report. All costs shown are as reported by the operator at the time of the incident.
- B. Starting Sept 2013, this column displays "volume released unintentionally" for all years after 2009. Before Sept 2013, the column displayed the sum of "volume released unintentionally" and "volume released intentionally" for all years after 2009.
- C. Net Barrels Lost applies only to Liquid incidents and is the difference between Gross Barrels Spilled and Barrels Recovered.
- D. Value of product lost is the estimated value of the released product at the time the report was made.

Sources

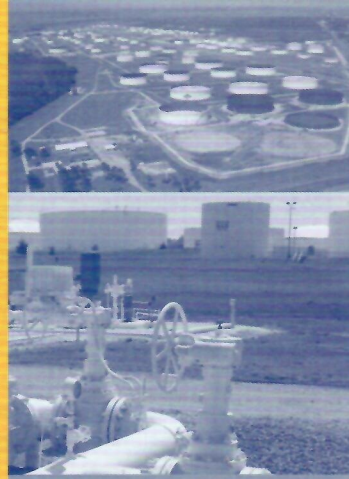
- 1. Operator specifics are obtained from self-reported annual reports since 2006. Unless otherwise noted, the most recently submitted report is used as the basis for the information here. Raw data files are available from the [PHMSA Data and Statistics](#) page. Please note that PHMSA's Office of Pipeline Safety is continually checking the quality and accuracy of these reports, therefore data presented here may change as we receive supplementary information from operators. Ascertainment date: February 1, 2018.
- 2. [PHMSA Flagged Incidents File](#) - February 28, 2018. Note: Incidents occurring up to 30 days prior to the Incident File source date may not appear in these reports due to the 30-day reporting period allowed by PHMSA regulation.

For comments and questions on the information presented on this site, please send us [feedback](#).

EXHIBIT D
Sunoco Brochure

Important Safety Message

for your neighborhood



Sunoco Logistics

Sunoco Pipeline L.P.

Operator of the Inland and Harbor pipeline systems

24-Hour Emergency Number: 800-786-7440

Non-Emergency Number: 877-795-7271

Website: www.sunocologistics.com

You are receiving this brochure because Sunoco Pipeline L.P. operates a pipeline in your community. Our underground pipelines provide a safe and efficient method of transporting a variety of products, including crude oil, gasoline, diesel fuel, kerosene, heating oil, jet fuel, butane, ethane, propane, and natural gas.

Petroleum Pipelines In Your Community

There are almost 200,000 miles of petroleum pipelines in the United States. According to the U.S. Department of Transportation, pipelines are the most reliable and safest way to transport the large volume of natural gas and petroleum used in the United States. Pipelines transport two-thirds of all the crude oil and refined products in the United States. Pipelines are made of steel, covered with a protective coating and buried underground. They are tested and maintained through the use of cleaning devices, diagnostic tools, and cathodic protection. Since Americans consume over 700 million gallons of petroleum products per day, pipelines are an essential component of our nation's infrastructure.

Keeping you safe

Maintaining safe pipeline operations is critical in all areas where we operate. In high population and environmentally sensitive areas known as High Consequence Areas, we perform additional inspections and analyses as part of our Integrity Management Program (IMP). Additional information on our IMP efforts is available on our website: www.sunocologistics.com.



Always call 811 before you dig

One easy phone call to 811 starts the process to have your underground pipelines and utility lines marked. When you call 811 from anywhere in the country, your call will be routed to your state One Call Center, who will contact underground facility owners in the area. So you can dig safely, Sunoco Pipeline personnel will contact you if one of our pipelines are in the area of the planned excavation. More information about 811 is at www.call811.com.

How to know where pipelines are located

Most pipelines are underground, where they are more protected from the elements and minimize interference with surface uses. Even so, pipeline rights-of-way are clearly identified by pipeline markers along pipeline routes that identify the approximate—NOT EXACT—location of the pipeline.

Every pipeline marker contains information identifying the company that operates the pipeline, the product transported, and a phone number that should be called in the event of an emergency.

Markers do not indicate pipeline burial depth, which will vary. Markers are typically seen where a pipeline intersects a street, highway or railway. For any person to willfully deface, damage, remove, or destroy any pipeline marker is a federal crime.



Pipeline Marker — This marker is the most common. It contains Sunoco Pipeline information, type of product, and our emergency contact number. Size, shape and color may vary.

Aerial Marker — These skyward facing markers are used by patrol planes that monitor pipeline routes.

Casing Vent Marker — This marker indicates that a pipeline (protected by a steel outer casing) passes beneath a nearby roadway, rail line or other crossing.

How would you recognize a pipeline leak?

While pipelines are the safest method of transporting the fuel and products we use every day, knowing how to recognize a pipeline leak is important. The following may indicate a pipeline leak:

- **Sight:** Liquid pools, discolored or abnormally dry soil/vegetation, continuous bubbling in wet or flooded areas, an oily sheen on water surfaces, and vaporous fogs or blowing dirt around a pipeline area can all be indicative of a pipeline leak. Dead or discolored plants in an otherwise healthy area of vegetation or frozen ground in warm weather are other possible signs.
- **Sound:** Volume can range from a quiet hissing to a loud roar depending on the size of the leak and pipeline system.
- **Smell:** An unusual smell, petroleum odor, or gaseous odor will sometimes accompany pipeline leaks.

What to do in the event a leak were to occur:

- Public safety and protecting the environment are the top priorities.
- **Turn off** any equipment and eliminate any ignition sources without risking injury.
- **Leave the area** by foot immediately. Try to direct any other bystanders to leave the area. Attempt to stay upwind.
- From a safe location, **call 911** or your local emergency response number and call the 24-hour emergency number for the pipeline operator. Provide your name, phone number, a brief description and location of the incident so a proper response can be initiated.

What not to do in the event a leak were to occur:

- **DO NOT** cause any open flame or other potential source of ignition such as an electrical switch, vehicle ignition, light a match, etc. Do not start motor vehicles or electrical equipment. Do not ring doorbells to notify others of the leak. Knock with your hand to avoid potential sparks from knockers.
- **DO NOT** come into direct contact with any escaping liquids or gas.
- **DO NOT** drive into a leak or vapor cloud while leaving the area.
- **DO NOT** attempt to operate any pipeline valves yourself. You may inadvertently route more product to the leak or cause a secondary incident.
- **DO NOT** attempt to extinguish a petroleum product fire. Wait for local firemen and other professionals trained to deal with such emergencies.

What to do in case of damaging/disturbing a pipeline

If you cause or witness even minor damage to a pipeline or its protective coating, please immediately notify the pipeline company. Even a small disturbance to a pipeline may cause a future leak. A gouge, scrape, dent or crease is cause enough for the company to inspect the damage and make repairs.

All damages to underground gas or hazardous liquid pipeline facilities are required by law to be reported to the operator. Excavators must notify the pipeline company immediately upon damaging a pipeline.

EXHIBIT E

HVL Properties

Product Information Sheets

Product Information sheets contained in this section have been compiled from the 2008 Emergency Response Guidebook and only include the products transported by the operators represented. Information contained in these sheets is believed to be up-to-date and correct at the time of printing. The next available update to the ERG will be in 2012.

Further product-specific information may be found in the US Department of Transportation (DOT) Emergency Response Guidebook for First Responders. The Guidebook is available at <http://hazmat.dot.gov/pubs/erg/guidebook.htm>.

POTENTIAL HAZARDS

FIRE OR EXPLOSION

- **EXTREMELY FLAMMABLE.**
- Will be easily ignited by heat, sparks or flames.
- Will form explosive mixtures with air.
- Vapors from liquefied gas are initially heavier than air and spread along ground.
- **CAUTION: Hydrogen (UN1049), Deuterium (UN1957), Hydrogen, refrigerated liquid (UN1966) and Methane (UN1971) are lighter than air and will rise. Hydrogen and Deuterium fires are difficult to detect since they burn with an invisible flame. Use an alternate method of detection (thermal camera, broom handle, etc.)**
- Vapors may travel to source of ignition and flash back.
- Cylinders exposed to fire may vent and release flammable gas through pressure relief devices.
- Containers may explode when heated.
- Ruptured cylinders may rocket.

HEALTH

- Vapors may cause dizziness or asphyxiation without warning.
- Some may be irritating if inhaled at high concentrations.
- Contact with gas or liquefied gas may cause burns, severe injury and/or frostbite.
- Fire may produce irritating and/or toxic gases.

PUBLIC SAFETY

- **CALL Emergency Response Telephone Number on Shipping Paper first. If Shipping Paper not available or no answer, refer to appropriate telephone number listed on the inside back cover.**
- As an immediate precautionary measure, isolate spill or leak area for at least 100 meters (330 feet) in all directions.
- Keep unauthorized personnel away.
- Stay upwind.
- Many gases are heavier than air and will spread along ground and collect in low

- or confined areas (sewers, basements, tanks).
- Keep out of low areas.

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Structural firefighters' protective clothing will only provide limited protection.
- Always wear thermal protective clothing when handling refrigerated/cryogenic liquids.

EVACUATION

Large Spill

- Consider initial downwind evacuation for at least 800 meters (1/2 mile).

Fire

- If tank, rail car or tank truck is involved in a fire, ISOLATE for 1600 meters (1 mile) in all directions; also, consider initial evacuation for 1600 meters (1 mile) in all directions.

EMERGENCY RESPONSE

FIRE

- **DO NOT EXTINGUISH A LEAKING GAS FIRE UNLESS LEAK CAN BE STOPPED. CAUTION: HYDROGEN (UN1049), DEUTERIUM (UN1957) AND HYDROGEN, REFRIGERATED LIQUID (UN1966) BURN WITH AN INVISIBLE FLAME. HYDROGEN AND METHANE MIXTURE, COMPRESSED (UN2034) MAY BURN WITH AN INVISIBLE FLAME.**

Small Fire

- Dry chemical or CO2.

Large Fire

- Water spray or fog.
- Move containers from fire area if you can do it without risk.

Fire involving Tanks

- Fight fire from maximum distance or use unmanned hose holders or monitor nozzles.
- Cool containers with flooding quantities of water until well after fire is out.
- Do not direct water at source of leak or safety devices; icing may occur.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from tanks engulfed in fire.
- For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible, withdraw from area and let fire burn.

SPILL OR LEAK

- ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area).
- All equipment used when handling the product must be grounded.
- Do not touch or walk through spilled material.
- Stop leak if you can do it without risk.
- If possible, turn leaking containers so that gas escapes rather than liquid.
- Use water spray to reduce vapors or divert vapor cloud drift. Avoid allowing water runoff to contact spilled material.
- Do not direct water at spill or source of leak.

- Prevent spreading of vapors through sewers, ventilation systems and confined areas.
- Isolate area until gas has dispersed. **CAUTION: When in contact with refrigerated/cryogenic liquids, many materials become brittle and are likely to break without warning.**

FIRST AID

- Move victim to fresh air.
- Call 911 or emergency medical service.
- Give artificial respiration if victim is not breathing.
- Administer oxygen if breathing is difficult.
- Remove and isolate contaminated clothing and shoes.
- Clothing frozen to the skin should be thawed before being removed.
- In case of contact with liquefied gas, thaw frosted parts with lukewarm water.
- In case of burns, immediately cool affected skin for as long as possible with cold water. Do not remove clothing if adhering to skin.
- Keep victim warm and quiet.
- Ensure that medical personnel are aware of the material(s) involved and take precautions to protect themselves.

DOT GUIDEBOOK ID #: 1075 **GUIDE #:** 115

CHEMICAL NAMES:

- N-BUTANE:
- "Normal" Butane
 - Butyl Hydride
 - LP Gas
 - LPG
 - Liquefied Butane
- ISO-BUTANE:
- 2-Methylpropane
 - "Iso"

CHEMICAL FAMILY:

Petroleum Hydrocarbon, Aliphatic Hydrocarbon, Alkane, Paraffin

COMPONENTS:

Butane: n-Butane, Iso-Butane, Propane, Butylenes, Pentane and heavier Hydrocarbons
 Iso-Butane: Iso-Butane, n-Butane, Propane, Butylenes

POTENTIAL HAZARDS

FIRE OR EXPLOSION

- **EXTREMELY FLAMMABLE**
 - Will be easily ignited by heat, sparks or flames.
 - Will form explosive mixtures with air.
 - Vapors from liquefied gas are initially heavier than air and spread along ground.
- CAUTION:** Hydrogen (UN1049), Deuterium (UN1957), Hydrogen, refrigerated liquid (UN1966) and Methane (UN1971) are lighter than air and will rise. Hydrogen and Deuterium fires are difficult to detect since they burn with an invisible flame. Use an alternate method of detection (thermal camera, broom handle, etc.)
- Vapors may travel to source of ignition and flash back.
 - Cylinders exposed to fire may vent and release flammable gas through pressure relief devices.
 - Containers may explode when heated.
 - Ruptured cylinders may rocket.

HEALTH

- Vapors may cause dizziness or asphyxiation without warning.
- Some may be irritating if inhaled at high concentrations.
- Contact with gas or liquefied gas may cause burns, severe injury and/or frostbite.
- Fire may produce irritating and/or toxic gases.

PUBLIC SAFETY

- **CALL Emergency Response Telephone Number on Shipping Paper first. If Shipping Paper not available or no answer, refer to appropriate telephone number listed on the inside back cover.**
- As an immediate precautionary measure, isolate spill or leak area for at least 100 meters (330 feet) in all directions.
- Keep unauthorized personnel away.
- Stay upwind.
- Many gases are heavier than air and will spread along ground and collect in low

or confined areas (sewers, basements, tanks).

- Keep out of low areas.

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Structural firefighters' protective clothing will only provide limited protection.
- Always wear thermal protective clothing when handling refrigerated/cryogenic liquids.

EVACUATION

Large Spill

- Consider initial downwind evacuation for at least 800 meters (1/2 mile).

Fire

- If tank, rail car or tank truck is involved in a fire, ISOLATE for 1600 meters (1 mile) in all directions; also, consider initial evacuation for 1600 meters (1 mile) in all directions.

EMERGENCY RESPONSE

FIRE

- **DO NOT EXTINGUISH A LEAKING GAS FIRE UNLESS LEAK CAN BE STOPPED.** **CAUTION:** Hydrogen (UN1049), Deuterium (UN1957) and Hydrogen, refrigerated liquid (UN1966) burn with an invisible flame. Hydrogen and Methane mixture, compressed (UN2034) may burn with an invisible flame.
- Small Fire**
- Dry chemical or CO₂.

Large Fire

- Water spray or fog.
- Move containers from fire area if you can do it without risk.

Fire involving Tanks

- Fight fire from maximum distance or use unmanned hose holders or monitor nozzles.
- Cool containers with flooding quantities of water until well after fire is out.
- Do not direct water at source of leak or safety devices; icing may occur.
- Withdraw immediately in case of rising sound from venting safety devices or discoloration of tank.
- ALWAYS stay away from tanks engulfed in fire.
- For massive fire, use unmanned hose holders or monitor nozzles; if this is impossible, withdraw from area and let fire burn.

SPILL OR LEAK

- ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area).
- All equipment used when handling the product must be grounded.
- Do not touch or walk through spilled material.
- Stop leak if you can do it without risk.
- If possible, turn leaking containers so that gas escapes rather than liquid.
- Use water spray to reduce vapors or divert vapor cloud drift. Avoid allowing water runoff to contact spilled material.
- Do not direct water at spill or source of leak.
- Prevent spreading of vapors through

sewers, ventilation systems and confined areas.

- Isolate area until gas has dispersed. **CAUTION: When in contact with refrigerated/cryogenic liquids, many materials become brittle and are likely to break without warning.**

FIRST AID

- Move victim to fresh air.
- Call 911 or emergency medical service.
- Give artificial respiration if victim is not breathing.
- Administer oxygen if breathing is difficult.
- Remove and isolate contaminated clothing and shoes.
- Clothing frozen to the skin should be thawed before being removed.
- In case of contact with liquefied gas, thaw frosted parts with lukewarm water.
- In case of burns, immediately cool affected skin for as long as possible with cold water. Do not remove clothing if adhering to skin.
- Keep victim warm and quiet.
- Ensure that medical personnel are aware of the material(s) involved and take precautions to protect themselves.

DOT GUIDEBOOK ID #: 1035
GUIDE #: 115

CHEMICAL NAMES:

- Ethane
- Bimethyl
- Dimethyl
- Methyl Methane
- Ethyl Hydride

CHEMICAL FAMILY:

Petroleum Hydrocarbon, Aliphatic Hydrocarbon, Paraffin, Alkane

COMPONENTS:

Ethane, Methane, Carbon Dioxide, Propane, Propylene, Ethylene, Iso-Butane, n-Butane, Higher Hydrocarbons

POTENTIAL HAZARDS

FIRE OR EXPLOSION

- **EXTREMELY FLAMMABLE..**
- Will be easily ignited by heat, sparks or flames.
- Will form explosive mixtures with air.
- Vapors from liquefied gas are initially heavier than air and spread along ground.
- **CAUTION: Hydrogen (UN1049), Deuterium (UN1957), Hydrogen, refrigerated liquid (UN1966) and Methane (UN1971) are lighter than air and will rise. Hydrogen and Deuterium fires are difficult to detect since they burn with an invisible flame. Use an alternate method of detection (thermal camera, broom handle, etc.)**
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- Keep unauthorized personnel away.
- Stay upwind.
- Many gases are heavier than air and will spread along ground and collect in low

- or confined areas (sewers, basements, tanks).
- Keep out of low areas.

PROTECTIVE CLOTHING

- Wear positive pressure self-contained breathing apparatus (SCBA).
- Structural firefighters' protective clothing will only provide limited protection.
- Always wear thermal protective clothing when handling refrigerated/cryogenic liquids.

EVACUATION

Large Spill

- Consider initial downwind evacuation for at least 800 meters (1/2 mile).

Fire

- If tank, rail car or tank truck is involved in a fire, ISOLATE for 1600 meters (1 mile) in all directions; also, consider initial evacuation for 1600 meters (1 mile) in all directions.

EMERGENCY RESPONSE

FIRE

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Small Fire

- Dry chemical or CO₂.

Large Fire

- Water spray or fog.
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Fire involving Tanks

- Fight fire from maximum distance or use unmanned hose holders or monitor nozzles.
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SPILL OR LEAK

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- Clothing frozen to the skin should be thawed before being removed.
- In case of contact with liquefied gas, thaw frosted parts with lukewarm water.
- In case of burns, immediately cool affected skin for as long as possible with cold water. Do not remove clothing if adhering to skin.
- Keep victim warm and quiet.
- Ensure that medical personnel are aware of the material(s) involved and take precautions to protect themselves.

DOT GUIDEBOOK ID #: 1075
GUIDE #: 115

CHEMICAL NAMES:

- Propane
- Propyl Hydride
- Dimethylmethane
- LP Gas
- LPG
- Liquefied Petroleum Gas
- Commercial-Grade Liquefied Propane
- "P-Rich Furnace Feed"

CHEMICAL FAMILY:

Petroleum Hydrocarbon, Aliphatic Hydrocarbon, Paraffin, Alkane

COMPONENTS:

Propane	Propylene
Butane	Iso-Butane
Ethane	Ethyl Mercaptan
Sulfur	

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: Sunoco Pipeline L.P. a/k/a/ :
Energy Transfer Partners : Docket No. P-2018-3000281
:
Petition of the Bureau of Investigation and :
Enforcement of the Pennsylvania Public :
Utility Commission For the Issuance of an :
Ex Parte Emergency Order :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Petition to Intervene upon the parties of record in this proceeding in accordance with the requirements of 52 Pa. Code 1.54 (relating to service by a participant), in the manner listed below upon the persons listed below:

Michael L. Swindler Deputy Chief Prosecutor Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement PO Box 3265 Harrisburg, PA 17105-3265	Curtis N. Stambaugh Assistant General Counsel Sunoco Logistics Partners LP 212 N. Third Street Suite 201 Harrisburg, PA 17101
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Nels J. Taber Senior Litigation Counsel Department of Environmental Protection Office of Chief Counsel 400 Market Street, 9 th Floor Harrisburg, PA 17101	Robert Burroughs PHMSA Eastern Region 280 Bear Tavern Road Suite 103 West Trenton, NJ 08628
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Office of Consumer Advocate 555 Walnut Street 5 th Floor, Forum Place Harrisburg, PA 17101-1923	Office of Small Business Advocate 300 North Second Street Suite 1102 Harrisburg, PA 17101
---	--

Mark Freed Joanna Waldron Curtin & Heefner 1040 Stony Hill Road Suite 150 Yardley, PA 19067	Thomas Snisack Kevin McKeon Whitney Snyder Hawke McKeon & Snisack LLP 100 North 10 th Street Harrisburg, PA 17101
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Respectfully Submitted,



Dated: March 26, 2018

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