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August 13, 2018

Via Electronic Filing

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
P.O. Bo 3265
Harrisburg, PA 17105-3265

*CHERRY HILL, NJ
**HONOLULU, HI
PHILADELPHIA, PA
by appointment only

**Partner responsible – John F. Gullace*
***Partner responsible – Brenda H. Gotanda*

Re: *Andover Homeowner's Association, Inc. v. Sunoco Pipeline L.P.*,
Complaint Docket No. C-2018-3003605

Pennsylvania State Senator Andrew E. Dinniman v. Sunoco Pipeline L.P.,
Docket No. C-2018-3001451 and P-2018-3001453

**SUNOCO PIPELINE L.P.'S ANSWER OPPOSING MOTION FOR
CONSOLIDATION FILED BY COMPLAINANT ANDOVER
HOMEOWNERS' ASSOCIATION, INC.**

Dear Ms. Chiavetta:

Enclosed for filing is Sunoco Pipeline L.P.'s Answer opposing the Motion for Consolidation filed by Complainant Andover Homeowners' Association, Inc. in the above-referenced matters. Copies have been served in accordance with the attached Certificate of Service.

If you have any questions regarding this filing, please contact the undersigned.

Respectfully submitted,



Diana A. Silva
For MANKO, GOLD, KATCHER & FOX, LLP

DAS/bad/11842-019
Enclosure

Rosemary Chiavetta, Esquire
August 13, 2018
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANDOVER HOMEOWNERS’ ASSOCIATION, INC.	:	
	:	
	:	
Complainant,	:	Docket No. C-2018-3003605
	:	
v.	:	
	:	
SUNOCO PIPELINE L.P.,	:	
	:	
Respondent.	:	

PENNSYLVANIA STATE SENATOR ANDREW E. DINNIMAN,	:	
	:	
	:	
Petitioner,	:	Docket Nos. P-2018-3001453 C-2018-3001451
	:	
v.	:	
	:	
SUNOCO PIPELINE L.P.,	:	
	:	
Respondent.	:	

**RESPONDENT SUNOCO PIPELINE L.P.’S ANSWER OPPOSING
ANDOVER HOMEOWNERS’ ASSOCIATION, INC.’S MOTION TO CONSOLIDATE**

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Attorneys for Respondent Sunoco Pipeline L.P.

Dated: August 13, 2018

Respondent, Sunoco Pipeline L.P. (“SPLP”), by undersigned counsel, respectfully submits this Answer opposing the Motion for Consolidation filed by Complainant Andover Homeowners’ Association, Inc. (“Andover”) under 52 Pa. Code § 5.81, which seeks to consolidate Andover’s Complaint with the complaint pending at Docket No. C-2018-3001451 filed by State Senator Andrew Dinniman (the “Dinniman Complaint”). Andover’s Motion should be denied because the two cases do not involve common questions of law or fact. Rather, each matter relates to independent and distinct concerns in two geographically-discrete locations. Andover’s Complaint also addresses an additional pipeline and seeks additional relief that is distinct from the relief sought by Senator Dinniman, further demonstrating that consolidating the two cases would be inefficient, improperly expand the scope of and thus delay the Dinniman Complaint, and that consolidation would be prejudicial to SPLP.

I. Legal Argument.

A. Consolidation is only appropriate when two matters address common questions of law or fact, consolidation does not expand the scope of a case, and where consolidation is not prejudicial.

Commission Rule 5.81 allows for one or more proceedings to be consolidated if they share sufficient common questions of law or fact and where a joint proceeding would avoid unnecessary costs or delay¹:

¹ As the Commission explained in *PUC v. Dauphin Consol. Water Supply Co.*, Dkt. No. R-00932604, 1993 WL 597782 (Order entered July 9, 1993), there are three types of consolidation, as described by the Pennsylvania Supreme Court in *Azinger v. Pa. R. Co.*, 262 Pa. 242 (Pa. 1918):

First, where all except one of several actions are stayed until one is tried, in which case the judgment in the one is conclusive as to the others; second, where several actions are combined into one and lose their separate identity and become a single action in which a single judgment is rendered; and, third, where several actions are ordered to be tried together but each retains its separate character and requires the entry of a separate judgment.

Id. at 245. It appears that Andover seeks the second form of consolidation, where both the Andover Complaint and Dinniman Complaint will proceed as a single action in which the Commission will issue a single order governing both actions.

(a) The Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.

52 Pa. Code. § 5.81.

Consolidation is only appropriate when there are sufficient common legal or factual issues between two cases and where an opposing party will not suffer prejudice as a result of the consolidation. *Compare In re Metro. Edison Co. et al.*, Dkt. No. I-00040102, 2004 WL 1877779 (Order entered June 24, 2004) (denying motion to consolidate electric-reliability investigation and reliability-benchmark cases for the same electric utilities, where the scope of the two matters differed and scheduling would be impacted) *with Hartman v. PECO*, Dkt. Nos. C-2015-2471129 and C-2015-2469877, 2015 WL 1780140 (Order entered Apr. 15, 2015) (consolidating payment complaints that were identical other than amount of money owed, because the second complaint “requires no more factual or legal development than the first, consolidation is justified as it furthers judicial efficiency and is not at all prejudicial to the parties.”); *Suggs v. Bell Tele. Co. of Pa.*, Dkt. No. F-00162258, 1993 WL 855845 (Order entered July 15, 1993) (consolidating utility payment complaints for same customer); *Hashi v. PGW*, Dkt. Nos. C-2014-2438411 and C-2014-2445068, 2015 WL 1606135 (Order entered Feb. 26, 2015) (consolidating cases that “involved the same Parties and revolved around identical factual events. . .”); *In re PECO Energy Company and Enron Energy Serv’s Power, Inc.*, Dkt. Nos. R-00973953 and P-00971265, 87 Pa. P.U.C. 718 (Order entered Oct. 9, 1997) (granting motion to consolidate where the same “factual, legal, and policy considerations” were presented in both actions, and where “it would be extraordinarily difficult for this Commission to make an informed decision concerning one petition without contemporaneous consideration of the other.”); *Poole v. Columbia Gas of Pa.*,

Inc., Dkt. No. Z-00109922, 1995 WL 945815 (Order entered June 19, 1995) (affirming consolidation where an additional legal issue in second case was necessarily included in the consideration of a broader legal issues in primary case).

While consolidation under Rule 5.81 is discretionary, consolidation cannot be granted when “consolidation tends to place the objecting party at a disadvantage or give an undue advantage to the adversary.” *Dauphin Consol. Water Supply Co.*, Dkt. No. R-00932604, 1993 WL 597782 (citing *Azinger*, 262 Pa. at 247). Further, where the legal or factual issues presented in each action differ, where the scope of one action would be expanded by consolidation, or where the litigation schedule for one action would be impacted by consolidation with the second action, consolidation is improper. *See e.g., In re Metro. Edison Co. et al.*, 2004 WL 1877779. For example, in *In re Metro. Edison Co. et al.*, the Commission denied a motion to consolidate filed by several electric distribution utilities that sought to consolidate a petition for amendment of benchmarks for electric reliability with a pending case regarding investigation of the same companies’ reliability performance. *Id.* at *1. The investigation matter was pending before an Administrative Law Judge and a litigation schedule was already in place, which would need to be extended to accommodate the consolidation. *Id.* The parties opposing consolidation also argued that while both cases dealt with electric reliability issues, the investigation matter was much narrower in scope than the benchmark matter. *Id.* at *3. The Commission agreed and denied the motion to consolidate, finding that the schedule for the investigation matter “would necessarily be disrupted if consolidation were to be ordered,” and that even though both cases addressed the same electric utilities and both concerned reliability issues, the two matters “are not so intertwined as to warrant consolidation.” *Id.* at *3, 4.

B. The Andover Complaint and Dinniman Complaint relate to two discrete and independent geographic areas, located six miles apart, in two separate counties.

Andover asserts in its Motion that its Complaint and the Dinniman Complaint “concern[] substantially similar subject matter.” Mot. ¶ 3. They do not. Rather, the Andover Complaint and Dinniman Complaint do not share sufficient factual or legal issues that would warrant consolidation. There would be no efficiency gained or costs avoided by consolidating the Andover and Dinniman complaints, which deal with safety concerns related to SPLP’s pipelines in two discrete and independent geographic areas, located six miles apart, in two separate townships, in two separate counties.

On its face, the Dinniman Complaint deals exclusively with the operation of SPLP’s existing Mariner East 1 pipeline (“ME1”) and the construction and eventual operation of the Mariner East 2 and Mariner East 2x pipelines (collectively “ME2”) in the limited geographic area of *West Whiteland Township, Chester County*. See Dinniman Am. Compl. ¶¶ 14-23 (describing geology of West Whiteland Township); ¶¶ 24-57 (describing ME1 and ME2 and alleged issues in West Whiteland Township). Senator Dinniman only seeks relief in West Whiteland Township. See *id.* at 13, 15, 17, 18. Both Administrative Law Judge (“ALJ”) Barnes and the Commission have recognized that the scope of Senator Dinniman’s complaint is limited to West Whiteland Township, as reflected in: (1) the May 21, 2018 Interim Emergency Order and Certification of Material Question²; (2) the Commission’s June 15, 2018 Opinion and Order

² See e.g., Interim Emergency Order (May 21, 2018) at 1-2 (describing Senator Dinniman’s Petition for Emergency Order related to ME1 and ME2 in West Whiteland Township; *id.* ¶ 7 (“That Sunoco Pipeline L.P. is enjoined from beginning and shall cease and desist all current operation, construction, including drilling activities on the Mariner East 1, 2 and Mariner East 2X pipeline in *West Whiteland Township*, Pennsylvania until the entry of a final Commission Order ending the formal amended complaint proceeding at Docket No. C-2018-3001451.”) (emphasis added); *id.* ¶ 17 (“That Sunoco Pipeline LP shall conduct geophysical and geotechnical studies regarding Mariner 2 and 2x in *West Whiteland Township* and shall submit the results to the Commission and parties in this case within thirty (30) days of the date of entry of this Order.”) (emphasis added); *id.* ¶ 19 (“Prior to any construction, open cut

affirming in part, and reversing in part the May 21, 2018 Interim Emergency Order³; and, (3) the August 2, 2018 Joint Motion of Commissioners Kennard and Coleman approving SPLP's compliance filings in response to the Commission's June 15, 2018 Opinion and Order.⁴ As the Commission described, Senator Dinniman's action is limited to West Whiteland Township: "the allegations of the Complaint and request for emergency relief assert that the operation of ME1, and construction of ME2 and ME2X create a dangerous condition which would adversely impact the *geographic area of West Whiteland Township*." Opinion and Order (June 15, 2018) at 22 (emphasis added).

In contrast, Andover's Complaint seeks to address alleged safety concerns related to the operation of ME1, ME2, and an existing 12-inch pipeline known as the "Point Breeze to Montello" line (the "12-inch pipeline") in a geographic area that is limited to Andover's residential development located in *Edgmont Township, Delaware County*. See Andover Compl.

or drilling activity in *West Whiteland Township*, Sunoco Pipeline, L.P. is directed to notify the Commission's Bureau of Investigation and Enforcement and accommodate staff presence during construction.") (emphasis added).

³ See e.g., Opinion and Order (June 15, 2018) at 2 (stating that material question is whether the evidentiary record supports interim emergency relief including construction of ME2 in *West Whiteland Township*); *id.* at 22 ("the allegations of the Complaint and request for emergency relief assert that the operation of ME1, and construction of ME2 and ME2X create a dangerous condition which would adversely impact the *geographic area of West Whiteland Township*." (emphasis added)); *id.* at 42 ("While there is insufficient evidence to support a finding that ME1 is being operated unsafely in *West Whiteland Township*, we do find that there is sufficient evidence to support a finding that the construction on ME2 and ME2X should remain halted until Sunoco meets the requirements that will be imposed by this Opinion and Order."); *id.* at 48 and ¶ 6 (describing information SPLP required to submit to seek resumption of construction of ME2 in *West Whiteland Township*); *id.* ¶ 7 (requiring SPLP to file verification or affidavit that PADEP issued appropriate permissions for continued construction of ME2 in *West Whiteland Township*).

⁴ See e.g., Joint Motion of Commissioner Norman J. Kennard and Commissioner John F. Coleman, Jr. (Aug. 2, 2018) at 1 (describing SPLP's compliance submissions in response to June 15th Order and its injunction on construction of ME2 in *West Whiteland Township*); *id.* at 2 ¶ 1 (ruling that injunction "is discontinued with respect to the eight locations on ME2 and ME2X pipelines in *West Whiteland Township*, Pennsylvania for which [SPLP] has received permitting authority from the [PADEP] to continue construction activities." (emphasis added)); *id.* ¶ 2 (injunction "remains in effect with respect to the four locations on the ME2 and ME2X pipelines in *West Whiteland Township*, Pennsylvania for which [SPLP] has not received permitting authority from [PADEP] to continue construction activities." (emphasis added)); *id.* ¶ 3 (instructing SPLP to "file supplemental verifications or affidavits that the [PADEP] has issued appropriate permission for continued construction of the ME2 and ME2X in *West Whiteland Township*, Pennsylvania when granted in the four locations awaiting permitting." (emphasis added)).

¶ 23-24, 27-31, 39, 49 (describing location of ME1 and 12-inch pipelines, an existing valve site, the proposed location of ME2 on Andover common property). Measured from the township boundary, West Whiteland Township in Chester County is *six miles* away from the Andover residential development in Edgmont Township, Delaware County. Senator Dinniman does not even represent the Pennsylvania Legislative District where the Andover Development is located – Senator Dinniman represents the 19th Legislative District, which is located exclusively in Chester County, whereas Edgmont Township in Delaware County is located in the 168th Legislative District, which represented by Christopher B. Quin.⁵

Moreover, in its Complaint, Andover asserts standing based only on the existence of ME1 and the 12-inch pipeline on Andover’s common property, including an existing valve site for those pipelines, and the proposed location of ME2 and a new valve site serving ME2 that are also located on Andover’s property. *See id.* ¶¶ 21-40. Andover does not allege any concrete connection to the activities and concerns described in Senator Dinniman’s Complaint. In fact, the only alleged connection to West Whiteland Township is that ME1 runs through both West Whiteland Township and the Andover property, that the ME1 and 12-inch pipeline valve site located on Andover’s property is “one valve site downstream from the valve site servicing the [ME1] segment crossing the Lisa Drive area” in West Whiteland Township, and that the new ME2 valve site is also a valve site downstream from West Whiteland Township. *See id.* ¶¶ 39(c), 39(e), 40. These are not common facts supporting consolidation of the Andover Complaint with the Dinniman Complaint, but rather demonstrate that each complaint deals with individual concerns related to different geographic areas that are separated by a significant distance and that relate to different components of the three different pipelines.

⁵ *See* 19th Legislative District Map, available at: <http://www.senatordinniman.com/19th-district/map> and 168th Legislative District Map, available at: <http://www.repchrisquinn.com/districtoutline.aspx>

Nor do West Whiteland Township and the area of the Andover residential development in Edgmont Township share similar physical characteristics, particularly in terms of geology, which is the substantial focus of Senator Dinniman’s arguments that the operation of ME1 and construction and operation of ME2 in West Whiteland Township is unsafe. As noted above, Senator Dinniman’s Complaint focuses exclusively on alleged safety risks in West Whiteland Township, which Senator Dinniman claims has a unique Karst geology that increases the risks to the public from the operation of ME1 and construction and operation of ME2 in West Whiteland Township. *See e.g.*, Dinniman Am. Compl. ¶ 15-23; *id.* ¶ 19 (“The limestone and dolomite portions of West Whiteland Township are characterized by karst features.”); *id.* ¶ 62 (“The route of ME1, ME2 and ME2X through West Whiteland Township traverses the township and passes through the highly sensitive and potentially unstable geologies of Conestoga Limestone and Ledger Dolomite. The instability of this region is exacerbated by at least four mapped fault lines running along the northern portion of West Whiteland Township, as well as contacts with less soluble lithologies such as the Octoraro Phyllite to the southeast; *id.* ¶ 67 (“The route of ME2 and ME2X through the complex, soluble, fractured and potentially unstable geology of West Whiteland Township . . .”). In contrast, Andover’s Complaint makes no allegations with respect to Karst geology because there is *no Karst geology* where the Andover residential development is located, nor is there any Karst geology in Edgmont Township, nor any Karst geology in the entirety of Delaware County. *See* SPLP Ex. 1, Map of Karst.⁶

While there may be some minimal overlap between the two matters – they both seek to address alleged safety issues related to SPLP’s pipelines – the majority of the factual and legal issues, witnesses, and expert testimony in the Senator Dinniman matter and the Andover matter

⁶ SPLP Exhibit 1 was admitted at the May 2018 hearing on Senator Dinniman’s Petition for Interim Emergency Relief, and is attached hereto for ease of reference.

are significantly different. Consolidation of the two cases would expand Senator Dinniman’s proceeding from a localized evaluation of pipeline safety in particular geology into a general investigation the safety of three separate pipelines, spanning two discrete geographic areas located in two separate townships that are six miles apart, and that are located in two separate counties. Andover’s Motion to Consolidate should therefore, be denied, and the cases should proceed independently, as the cases “are not so intertwined as to warrant consolidation.” *In re Metro. Edison Co. et al.*, 2004 WL 1877779 at *4.

C. The Andover Complaint addresses an additional pipeline that is not at issue in the Dinniman Complaint.

The Andover Complaint addresses a pipeline that is not part of the Senator Dinniman case – SPLP’s existing 12-inch pipeline that is in the process of being repurposed for natural gas liquids service. *See* Andover Compl. ¶¶ 24, 27. There is no allegation in Senator Dinniman’s Complaint related to the 12-inch pipeline, and despite Andover’s assertion that both complaints involve the 12-inch line (*see* Mot. ¶ 4), Senator Dinniman’s Complaint does not address the 12-inch pipeline. Andover attempts to connect its independent concerns with the 12-inch pipeline that is installed along Andover’s common property to the Dinniman Complaint by asserting that both ME1 and the 12-inch line were built in the 1930s. *See* Andover Comp. ¶ 25; Motion ¶¶ 3-4. Andover also asserts that the 12-inch line runs parallel to ME1 and ME2 along its common property, and that if a leak occurs from any of the three pipelines, the members of the Andover residential development will be harmed. Andover Compl. ¶¶ 30-32.

If the mere presence of an existing pipeline installed during a similar time period was sufficient to establish a commonality of facts and legal issues warranting consolidation, then concerns with any pipeline operating in either Delaware or Chester County could be joined with Andover’s action. Andover’s Motion to Consolidate should be therefore be denied, because

allowing the two matters to proceed together would improperly expand the Dinniman matter to address a pipeline that is not involved in the Dinniman Complaint.

D. The Andover Complaint and Dinniman Complaint seek different relief.

Andover's Motion to Consolidate should be denied because Andover and Senator Dinniman seek substantially different relief in their respective complaints, demonstrating that there are significant individual rather than common questions of law and fact in each.

As noted above, Senator Dinniman seeks relief that is exclusive to West Whiteland Township, including:

- Prohibiting the construction and operation of ME2 in West Whiteland Township;
- Prohibiting the operation of ME1 in West Whiteland Township;
- Requiring SPLP to conduct and release a written integrity management program, risk analysis, and other information "to warn and protect the public from danger and reduce the hazards to which the public may be subject by reason of ME1 [and ME2]";
- Prohibiting the construction of ME2 and operation of ME1 in areas of West Whiteland Township containing private dwellings, industrial buildings, and places of public assembly; and
- Finding that SPLP is not a public utility and that ME1 and ME2 are not public utility equipment or facilities.

See Dinniman Am. Compl. at 13, 15, 17, 18, 19.

In contrast, Andover requests broad relief to address general safety concerns related to ME1, ME2, and the 12-inch line, including:

- Requiring SPLP to perform a risk assessment "to determine whether Sunoco is able to operate any or all of the Mariner East system in compliance with the Commission requirements to safely. . . provide transportation services"; and,
- "[R]estricting or enjoining Mariner East operations unless Sunoco provides a comprehensive risk assessment and credible notification and evacuation plan."

Andover Compl. at 23.

The only overlap in the relief requested is that both Senator Dinniman and Andover request the Commission to order SPLP to perform a risk assessment on its pipelines and provide information to the public regarding emergency response procedures. But even this limited overlapping request for relief presents significantly different factual and legal considerations, and would require a localized analysis into two independent geographic areas, in two separate townships, in two separate counties that vary in terms of population, population density, effected land uses, potential hazards, and geology. This is demonstrated again by the allegations in each complaint. Senator Dinniman alleges that SPLP did not provide sufficient information for emergency responders in *Chester County* (Dinniman Am. Compl. ¶ 75), whereas Andover points to the inadequacy of the *Delaware County* alert system as a reason why SPLP's emergency response communications is inadequate (Andover Compl. ¶ 92).

Andover's Motion to Consolidate should be denied because the Dinniman Complaint and Andover Complaint seek different relief, which demonstrates that the two matters should proceed independently.

E. Consolidation will impact the timing of the resolution of both the Dinniman Complaint and the Andover Complaint.

Consolidating the Andover and Dinniman Complaints will disrupt the schedule for the Commission's resolution of the Dinniman matter, which the Commission found in *In re Metro Edison Co.* to weigh against consolidation. 2004 WL 1877779 at *3-4. The Dinniman Complaint has been pending since April 2018, and several rulings have already been made in the case by ALJ Barnes and the Commission, and several parties, including Andover, have intervened in that action.

Andover's Complaint was just recently filed on July 25, 2018, and it is yet unknown whether additional parties will be seeking to intervene in the Andover matter. While both cases

have been assigned to ALJ Barnes, consolidation of the two cases will affect the timing for case management deadlines in the Dinniman matter, and will likely require that the deadlines for discovery, filing direct and rebuttal testimony, and the hearing date be extended to accommodate the broader issues that would be presented if both matters were consolidated.

Consolidation is further inappropriate because the Commission recently granted SPLP's Motion for Certification of the Commission's June 15, 2018 Order for interlocutory appeal to the Commonwealth Court on the issue of Senator Dinniman's standing to bring his complaint before the Commission. *See* Opinion and Order (July 25, 2018). In accordance with the Commission's July 25 Order, SPLP is in the process of filing Petition for Permission to Appeal under Appellate Rule 1311(b). Consolidating the Andover Complaint with the Dinniman Complaint now, before the interlocutory appeal to the Commonwealth Court is decided, would impact the schedules for the resolution of both matters. If the Commonwealth Court accepts SPLP's interlocutory appeal, the appeal could result in the Dinniman Complaint being stayed, the Dinniman Complaint could be dismissed in its entirety for lack of standing, or both. If the Andover and Dinniman cases are consolidated and the Dinniman Complaint is stayed during the pendency of the Commonwealth Court appeal, the resolution of Andover's Complaint would necessarily be significantly delayed. Likewise, if the Andover and Dinniman cases are consolidated and Commonwealth Court finds that Senator Dinniman lacks standing to bring his Complaint before the Commission, then the two cases would need to be unconsolidated and the Andover Complaint would proceed on its own. Either outcome demonstrates that consolidation of the Andover and Dinniman complaints would not "avoid unnecessary costs or delay" as required by Commission Rule 5.81. 52 Pa. Code § 5.81.

Consolidation should be denied, because joining the Andover Complaint with the Dinniman Complaint would not avoid delay, but in fact would cause delay in the resolution of both the Dinniman and the Andover cases.

II. Conclusion

Andover's Motion to Consolidate should be denied, because the Andover Complaint and the Dinniman Complaint "are not so intertwined as to warrant consolidation." *In re Metro. Edison Co. et al.*, 2004 WL 1877779 at *4. The two cases do not involve sufficient common issues of fact or law, but rather relate to safety concerns in two geographically-discrete locations that are six miles apart, located in two separate townships, and two separate counties. The Andover Complaint also makes claims about SPLP's 12-inch pipeline, which is not even mentioned in the Dinniman Complaint, and two complaints seek significantly different relief. Further, consolidating the Andover case with the Dinniman case will delay the resolution of the Dinniman matter, which has been pending since April 2018, and also delay resolution of the Andover matter during the interlocutory appeal of Senator Dinniman's standing.

/s/ Robert D. Fox, Esq.

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Sunoco Pipeline L.P.*

Dated: August 13, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the forgoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party). This document has been filed electronically on the Commission’s electronic filing system, and electronically served on the following:

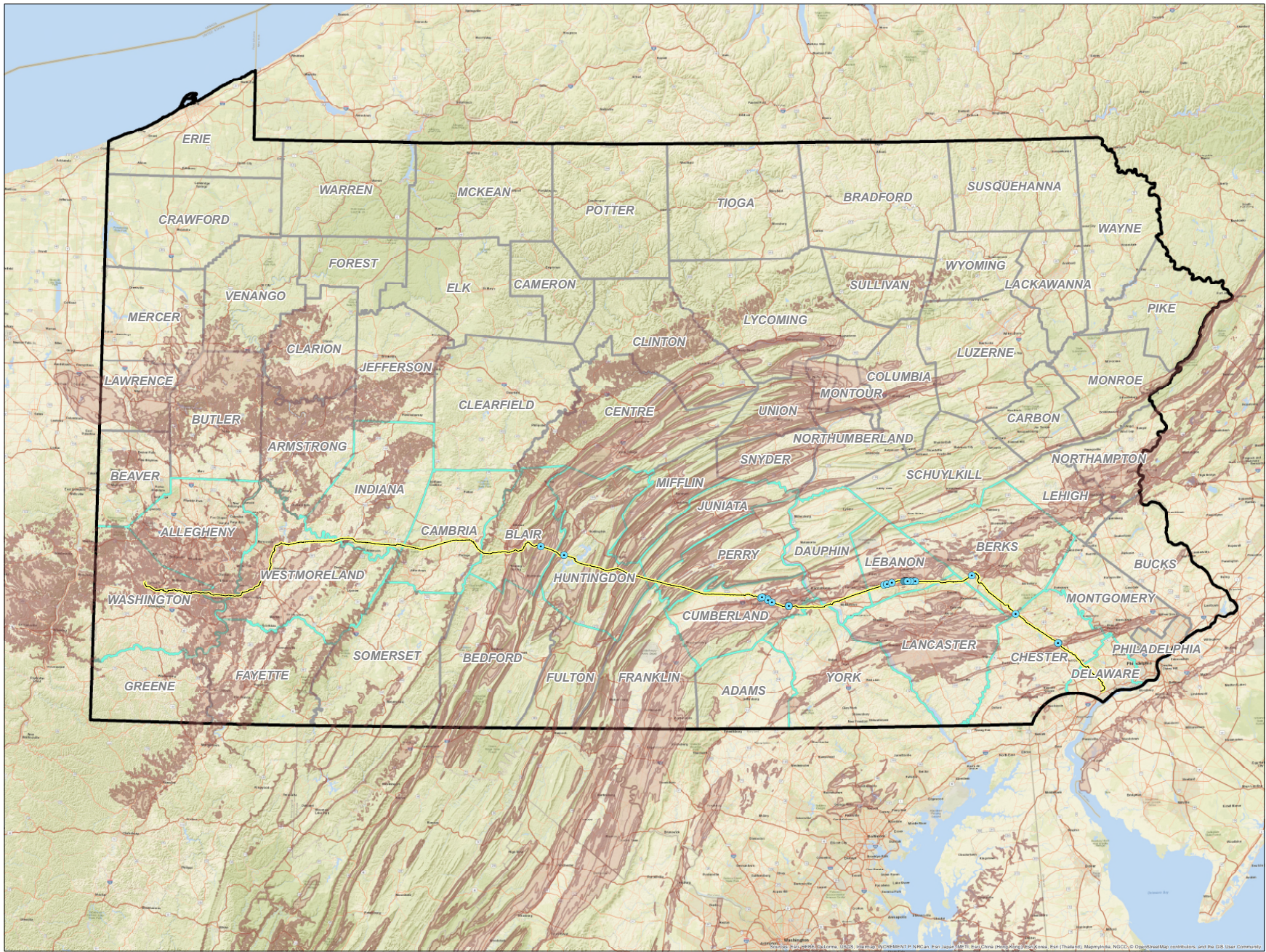
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Dated: August 13, 2018





/s/ Diana A. Silva, Esq.

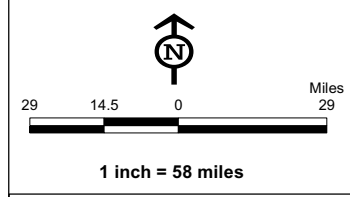
Diana A. Silva, Esq. (PA ID No. 311083)

EXHIBIT 1



Legend

-  PPP Centerline Corridor
-  Karst Surface Depression
-  Carbonate Rock Strata
-  County Boundary



Carbonate Rock Strata and Karst Geologic Hazards Crossed by the Sunoco Pennsylvania Pipeline Project, PA.