

Laura Obenski  
14 S Village Avenue  
Exton, PA 19341

Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
P.O. Box 265  
Harrisburg, PA 17105-3265

April 19, 2019

Re: Laura Obenski v. Sunoco Pipeline L.P., #C-2019-3006905  
OBENSKI PREHEARING CONFERENCE MEMORANDUM

Dear Secretary Chiavetta,

Enclosed for electronic filing with the Pennsylvania Public Utility Commission, please find my prehearing conference memorandum.

Regards,

  
Laura Obenski, *pro se*

Attachment

cc: Certificate of Service

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LAURA OBENSKI  
*Complainant*

v.

SUNOCO PIPELINE L.P.  
*Respondent*

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DOCKET #C-2019-3006905

**OBENSKI PREHEARING CONFERENCE MEMORANDUM**

In response to the order of the Honorable Judge Barnes, dated March 20, 2019, I hereby submit this prehearing conference memorandum as follows.

**I. Parties to be Served**

I have no additions related to service of parties.

**II. Statement Regarding Settlement of Case**

I am willing to engage in discussion regarding settlement involving the matters brought forth in this case.

**III. Discovery Schedule**

With respect to the fact that I have motioned to consolidate with the Flynn et al. complaint (C-2018-3006116), I have no proposed changes to their proposed schedule of discovery.

**IV. Other Proposed Changes Regarding Discovery**

I have no proposed changes to the Commission’s regulations regarding discovery.

**V. Site Visit**

To fully understand the impact of the pipeline infrastructure in my neighborhood and upon the public school facilities my children currently attend and will attend in the future, and the subsequent emergency response, notification and evacuation considerations that must be accounted for involving the layout, topography and specific details of my community, I believe a site visit is necessary and beneficial.

**VI. Proposed Schedule**

With respect to the fact that I have motioned to consolidate with the Flynn et al. complaint (C-2018-3006116), I have no proposed changes to their timeline presented.

## **VII. Potential Witnesses**

Potential witnesses to present testimony related to my complaint include, but are not limited to, the following:

Dr. Emilie Lonardi, Superintendent  
Downingtown Area School District  
540 Trestle Place  
Downingtown, PA 19335  
(610) 269-8460  
Topics: School Safety

Bill Turner, Deputy Director, Emergency Management  
Chester County Department of Emergency Services  
601 Westtown Road  
West Chester PA 19382  
(610) 344-5000  
Topics: Emergency Preparedness

I also intend to offer the testimony of other school, township, and County officials who can testify and provide evidence of the degree of difficulty in working with Sunoco regarding issues such as safety, emergency planning, and their ability to appropriately protect the safety and welfare of my family. I reserve the right to call additional witnesses as necessary and agree to notify Judge Barnes and all parties should I determine additional witnesses are necessary.

## **VIII. Issues and Evidence**

### **A. Consolidation of Complaints**

As evidenced by my prior motion to consolidate with the Flynn et al. complaint (C-2018-3006116), I am favorable towards consolidation. Given the presence of other parties intervening on the Flynn et al. complaint that all have similar arguments and will likely be providing testimony relevant to my argument (Downingtown Area School District, County of Chester, Uwchlan Township), I believe consolidation to be reasonable and justifiable. However, I request to maintain full party status in the proceeding and do not forfeit the right to any requested relief or the ability to prosecute my own complaint. I am prepared to participate in communications with the Flynn et al. complainants on the integration of my complaint to the extent our issues overlap.

**B. Public Awareness/Emergency Preparedness**

It is my position that public awareness initiatives undertaken by Sunoco are insufficient and negatively affect the safety and welfare of my family in my home and community.

**C. Mass Warning Systems**

It is my position that a mass warning system/early detection system is required to be in place to assure the safety of my family against the involuntary risk we have been exposed to by pipeline infrastructure in our community. The absence of this system is a detriment to the safety of my family and should be required to be in place, at the expense of the operator, prior to the transportation of product.

**D. Pipeline Integrity Management**

It is my position that the ongoing scrutiny and notices of violation issued against Sunoco on behalf of the Commission and other federal and state agencies raises serious concerns regarding the statewide integrity of the Mariner East pipelines.

**E. Leak Detection Protocols**

It is my position that there are not proper leak detection protocols in place for the Mariner East pipeline project that properly account for the safety and welfare of my family to the extent required by law.


**F. Location of Pipelines Close to Dwellings and Public Gathering Places**

It is my position that the location of pipelines close to dwellings and public gathering places, such as public parks and schools, are an unmitigated and involuntary risk on my family and pose concerns that are unreasonable and unsafe.

**G. Valve Spacing- Status of Construction of Valves**

It is my position that the valve locations in my community present unique safety hazards to the health and safety of my children that cannot be fully mitigated and assessed due to negligence on behalf of Sunoco to properly communicate with those in charge of emergency preparedness and planning in my community. With that in mind, I find the valve placement to be inappropriate.

Respectfully submitted,

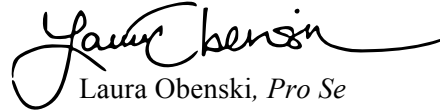
  
Laura Obenski, *pro se*

Dated: April 19, 2019

## CERTIFICATE OF SERVICE

I hereby certify that on this day, April 19, 2019, I have served a true copy via electronic mail of the forgoing document upon the parties, listed below, in accordance with the requirements of 52 PA Code § 1.54 (relating to service by a party).

Thomas J. Sniscak, Esq.  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
Kevin J. McKeon, Esq.  
[kjmckeon@hmslegal.com](mailto:kjmckeon@hmslegal.com)  
Whitney E. Snyder, Esq.  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)

  
Laura Obenski, *Pro Se*

Robert D. Fox, Esq.  
[rfox@mankogold.com](mailto:rfox@mankogold.com)  
Neil S. Witkes, Esq.  
[nwitkes@mankogold.com](mailto:nwitkes@mankogold.com)  
Diana A. Silva, Esq.  
[dsilva@mankogold.com](mailto:dsilva@mankogold.com)

David J. Brooman  
[dbrooman@highswartz.com](mailto:dbrooman@highswartz.com)  
Richard Sokorai  
[rsokorai@highswartz.com](mailto:rsokorai@highswartz.com)  
Mark R. Fischer  
[mfischer@highswartz.com](mailto:mfischer@highswartz.com)

Michael S. Bomstein, Esq.  
[mbomstein@gmail.com](mailto:mbomstein@gmail.com)

Thomas Casey  
[tcaseylegal@gmail.com](mailto:tcaseylegal@gmail.com)

Anthony D. Kanagy, Esquire  
Garrett P. Lent, Esquire  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)

Josh Maxwell  
[jmaxwell@downingtown.org](mailto:jmaxwell@downingtown.org)

Rich Raiders, Esq.  
[rich@raiderslaw.com](mailto:rich@raiderslaw.com)

Stephanie M. Wimer  
[stwimer@pa.gov](mailto:stwimer@pa.gov)

Vince M. Pompo, Esq.  
[vpompo@lambmcerlane.com](mailto:vpompo@lambmcerlane.com)  
Guy. A. Donatelli, Esq.  
[Gdonatelli@lambmcerlane.com](mailto:Gdonatelli@lambmcerlane.com)  
Alex J. Baumler, Esq.  
[abaumler@lambmcerlane.com](mailto:abaumler@lambmcerlane.com)

Michael Maddren, Esq.  
[maddrenM@co.delaware.pa.us](mailto:maddrenM@co.delaware.pa.us)  
Patricia Sons Biswanger, Esq.  
[patbiswanger@gmail.com](mailto:patbiswanger@gmail.com)

Margaret A. Morris, Esq.  
[mmorris@regerlaw.com](mailto:mmorris@regerlaw.com)

James C. Dalton, Esq.  
[jdalton@utbf.com](mailto:jdalton@utbf.com)

Leah Rotenberg, Esq.  
[rotenberg@mcr-attorneys.com](mailto:rotenberg@mcr-attorneys.com)

Melissa DiBernardino  
[lissdibernardino@gmail.com](mailto:lissdibernardino@gmail.com)

Mark L. Freed  
[mlf@curtinheefner.com](mailto:mlf@curtinheefner.com)

Virginia Marcille-Kerslake  
[vkerslake@gmail.com](mailto:vkerslake@gmail.com)

James R. Flandreau  
[jflandreau@pfbllaw.com](mailto:jflandreau@pfbllaw.com)

James J. Byrne, Esq.  
[jjbyrne@mbmlawoffice.com](mailto:jjbyrne@mbmlawoffice.com)  
Kelly S. Sullivan, Esq.  
[ksullivan@mbmlawoffice.com](mailto:ksullivan@mbmlawoffice.com)

