

**DEP Permit # E15-862**  
**DEP Permit HDD Reference # PA-CH-0100.0000-RD**  
**DEP HDD # S3-0290**  
**Township – Upper Uwchlan**  
**County – Chester**  
**HDD Site Name – Little Conestoga Road Crossing**

**1<sup>st</sup> Public Comment Period**

Commentator ID #	Name and Address	Affiliation
1	Carrie Gross	
2	Robin Spurlino 109 Kaiser Dr Downingtown, PA 19335	
3	Gregory LaRosa	
4	Lisa Longo	
5	John McDevitt	
6	Donald Robinson 12 Wyndham Lane Chester Springs, PA 19425	
7	MaryAnne Troy 1002 Birchwood Lane Glen Mills, PA 19342	
8	Russell Zerbo 1330 S Melville St Philadelphia, PA 19143	
9	Bonnie Eisenfeld 2031 Locust St, Apt 402 Philadelphia, PA 19103	
10	Sara Hale 724 Fern St. Yeadon, PA 19050	
11	Margaret Goodman 51 Broomall Lane Glen Mills, PA 19342	
12	Marie Snavely 445 S Cedar St Lititz, PA 17543	
13	Barbara McNutt 28 Ambling Ln Levittown, PA 19055	

14	Lisa Gares 10 Crow Creek Lane Wayne, PA 19087	
15	Albert Coffman 116 N Ridge Rd Perkasie, PA 18944	
16	William Montgomery 124 Lindley Ln Pottstown, PA 19465	
17	Meta Neilson 77 Middle Rd Apt 263 Bryn Mawr, PA 19010	
18	Dale Harris 79 Ardmore Avenue Lansdowne, PA 19050	
19	Olivia Catarinella 833 Derby Dr West Chester, PA 19380	
20	Jessica Krow 3118 W Penn St Philadelphia, PA 19129	
21	Priscilla Mattison 1052 Broadmoor Rd Bryn Mawr, PA 19010	
22	Marilyn Maurer 538 Ballytore Rd Wynnewood, PA 19096	
23	Roseann Martorana 212 Glenside Rd Downingtown, PA 19335	
24	Morgan Greenly 106 Taylors Way Honey Brook, PA 19344	
25	Margaret Hudgings 409 W. Union Street West Chester, PA 19382	
26	Betsy Amber 11 Buttonwood Dr Exton, PA 19341	
27	Walter Pankoe 160 Middle Rd Apt L2 Dublin, PA 18917	

28	Sidne Baglini 203 Channing Avenue Malvern, PA 19355	
29	Peter Patton 703 Grove Place Havertown, PA 19083	
30	Wesley Merkle 3458 Midvale Ave Philadelphia, PA 19129	
31	Linda Taylor 3118 Victoria Court Bensalem, PA 19020	
32	Ellen Sinclair 217 Lochwood Lane West Chester, PA 19380	
33	James Castellan 42 Rabbit Run Rd Rose Valley, PA 19086	
34	B Nigrini 508 Marshall Dr Shillington, PA 19607	
35	Lea Stabinski 130 Mustang Way Eagleville, PA 19403	
36	Fran Demillion 713 Arbor Lane Kennet Square, PA 19348	
37	Dru Finkbeiner 222 Woodward Rd Media, PA 19063	
38	Catherine Faulkner 217 Roxborough Avenue Philadelphia, PA 19128	
39	Anne Kirby 5429 Pinehurst Dr Wilmington, DE 19808	
40	Suzanne de Seife 222 Ridgewood Rd. Media, PA 19063	
41	Pooja Bhandari 3458 Midvale Ave Philadelphia, PA 19129	

42	Jason Volpe 826 N Capitol St Philadelphia, PA 19130	
43	Ann Kuter 562 Taylor Ave Warrington, PA 18976	
44	Stephen Duskin 160 Shelmire Road Downingtown, PA 19335	
45	Deborah McIlvaine 3906 Vaux Street Philadelphia, PA 19129	
46	Agnes Albany 5018 N Convent Lane Philadelphia, PA 19114	
47	Sally Thompson 517 Brook La Warminster, PA 18974	
48	Allan Freedman 7821 Park Ave Elkins Park, PA 19027	
49	Lynda Ferguson Bishop Hollow Road Newtown Square, PA 19073	
50	Anne Jackson PO Box 516 Morgantown, PA 19543	
51	Brian Resh 1153 Marticville Rd Pequea, PA 17565	
52	Michelle Alvare 134 Hastings Avenue Havertown, PA 19083	
53	Ina Asher 301 North Latches Lane Merion Station, PA 19066	
54	Brenda Hartman 1138 Douglass St Reading, PA 19604	
55	John Bush 301 Gilmer Rd Coatesville, PA 19320	
56	Marion Yaglinski 1248 Hunt Club Lane Media, PA 19063	

57	Peter Patton 703 Grove Place Havertown, PA 19083	
58	Donna Smith 1367 Harrington Road Havertown, PA 19083	
59	Alexis Heilala 346 Farnum Rd Media, PA 19063	
60	Glenn Gawinowicz 806 Hunters Lane Oreland, PA 19075	
61	Angela Morgera 4 Spring Street Media, PA 19063	
62	Steve Sears 8 Saint Dunstans Road Hatboro, PA 19040	
63	Dale Harris 79 Ardmore Avenue Lansdowne, PA 19050	
64	Debbie Dawson 509 Fernwood Ave Folsom, PA 19033	
65	Michael Drake 8339 Thomson Road Elkins Park, PA 19027	
66	Jill Turco 2428 Manton St. Philadelphia, PA 19146	
67	Logan Welde 967 N American Philadelphia, PA 19123	
68	Frank Denbowski 1030 N 6th St Reading, PA 19601	
69	Beverly Foster 364 Conestoga Road Wayne, PA 19087	
70	Mark Levin 3038 Arrowhead Lane Plymouth Meeting, PA 19462	
71	Susan Shaak 3440 Stoner Ave Reading, PA 19606	

72	Grayson Henry 451 Bethlehem Pike Colmar, PA 18915	
73	Linda Granato PO Box 51216 Philadelphia, PA 19115	
74	Kathie E Takush 1026 Franklin St Apt 1206 Reading, PA 19602	
75	Victoria English 617 Radnor Valley Dr. Villanova, PA 19085	
76	Jason Rash 305 Dogwood Lane Wallingford, PA 19086	
77	Janet Vokoun 1010 Laurel Drive West Chester, PA 19380	
78	David Morgan 29 School St Ambler, PA 19002	
79	Donna Cosgrove 2411-C Delancey Place Philadelphia, PA 19103	
80	K Eble 58 Lee Lynn Ln Huntingdon Valley, PA 19006	
81	Barbara Bradshaw 62 Snyder Ln Springfield, PA 19064	
82	Greg Navarr0 266 Lyceum Ave. Philadelphia, PA 19128	
83	Katherine Boas 435 Hilton Dr Lancaster, PA 17603	
84	Vincent Prudente 1826 Fitzwater Street Philadelphia, PA 19146	
85	Sheila Erlbaum 7150 Bryan St. Philadelphia, PA 19119	
86	Erin Gallagher 1787 Jefferson Downs West Chester, PA 19380	

87	Joni Kloss 471 Lang Dr Yardley, PA 19067	
88	Gwenn Meltzer 1847 Constitution Av Woodlyn, PA 19094	
89	Michael Lombardi 19 Morning Glory Lane Levittown, PA 19054	
90	Gina LoBiondo 105 Green Briar Ln Havertown, PA 19083	
91	David Spangenberg 5743 Lower York Road P.O. Box 215 Lahaska, PA 18931	
92	Lora Snyder 14 Gradyville Rd Glen Mills, PA 19342	
93	Faye Donovan 1126 Hares Hill Road Phoenixville, PA 19460	
94	Susan Babbitt 319 South Tenth Street Philadelphia, PA 19107	
95	Joyce Pfeiffer 1011 Howard Rd. Warminster, PA 18974	
96	Linda Blythe 4433 Osage Ave. Philadelphia, PA 19104	
97	Steve Stales 12119 Thornton Rd Philadelphia, PA 19154	
98	J. William Inslee 332 Country Club Rd Coatesville, PA 19320	
99	Ryan Dodson 175 Hess Blvd Lancaster, PA 17601	
100	Greta Aul 917 Columbia Ave Lancaster, PA 17603	

101	Susan Corson-Finnerty 1170 Woods Rd Southampton, PA 18966	
102	Phil Tischler 506 Rckraymond Road Downingtown, PA 19335	
103	Janet Parlett 108 Karen Circle Coatesville, PA 19320	
104	Jessica Puk 1520 Salomon Lane Wayne, PA 19087	
105	B Soltis 690 Hopewell Rd Downingtown, PA 19335	
106	Davina Hagan 1422 Orchard Way Bryn Mawr, PA 19010	
107	Laurie Zdrofcoff 2225 N 4th Ave Whitehall, PA 18052	
108	Bill Wegemann 629 N. Speakman Lane West Chester, PA 19380	
109	Steve Rominger 49 Bancroft Mills Rd. Wilmington, DE 19123	
110	Bill Spadel 2850 Willits Rd Philadelphia, PA 19136	
111	Bruce Brown 709 Great Springs Road Bryn Mawr, PA 19010	
112	Suzanne Cornell 709 Arbor Lane Kennett Square, PA 19348	
113	Pat Bush 301 Gilmer Rd. Coatesville, PA 19320	
114	Denise Costello 1325 Wolf Street Philadelphia, PA 19148	
115	Janet Cavallo 1276 Providence Rd Secane, PA 19018	



116	Bernard Greenberg 894 Jefferson Way West Chester, PA 19380	
117	Carol Sandt 382 River Road Pequea, PA 17565	
118	Catherine Smith Smith 904 N Providence Rd Media, PA 19063	
119	Eileen Brzycki 33 Chestnut St. Newtown Square, PA 19073	
120	Henry Frank 2763 Island Ave Philadelphia, PA 19153	
121	Mark Waltzer 1509 Squire Lane Cherry Hill, NJ 08003	
122	John Hoekstra 32 Sheeder Mill Road Spring City, PA 19475	
123	Mike Peale 5 Worth Hill Ln Aston, PA 19014	
124	Mary Ann Leitch 526 Reed St Philadelphia, PA 19147	
125	Justin Tennenbaum 1305 Washington Ln Rydal, PA 19046	
126	Jerry Orr 607 N. Wyomissing Blvd Wyomissing, PA 19610	
127	Sharon Newman 581 S Creek Rd West Chester, PA 19382	
128	Wendy Futrick 4 E Elm Street Shillington, PA 19607	
129	Poune Saberi 1504 Montrose St. Philadelphia, PA 19146	
130	Nathan Van Velson 410 Alden Dr. Lancaster, PA, PA 17601	

131	Denise Bonk 2608 E Venango St Philadelphia, PA 19134	
132	Leslie Gardner 1812 W Seybert St Philadelphia, PA 19121	
133	Stephanie Swann 500 Gordon Ave. Penn Valley, PA 19072	
134	Barbara Cicalese 16 W Montgomery Ave Apt 10 Ardmore, PA 19003	
135	Wilmalyn Puryear 209 Sandee Rd. Timonium, MD 21093	
136	MaryAnne Troy 1002 Birchwood Lane Glen Mills, PA 19342	
137	Cindy M. Dutka 6547 Haverford Ave. APT 4 Philadelphia, PA 19151	
138	Loretta Dunne 118 South 21st Street, Apt. 623 Philadelphia, PA 19103	
139	Bob Steininger 100 Westridge Place South Phoenixville, PA 19460	
140	Arianne Allen 12 Brookside Rd Wallingford, PA 19086	
141	Jack Roberts 307 W Grant St Lancaster, PA 17603	
142	Bruce Moyer 602 Halteman Rd Souderton, PA 18964	
143	Mark Canright 8 Deboer Farm Ln Asbury, NJ 08802	
144	Amy Hansen 8 Deboer Farm Ln Asbury, NJ 08802	
145	Sean Duffin 395 Hilltop Rd Paoli, PA 19301	

146	Park Furlong 133 E Bristol Road Feasterville-Treose, PA 19053	
147	Mimi Burstein 27 East Central Paoli, PA 19301	
148	Theodore Burger 3370 Woodbridge Cir. Bethlehem, PA 18017	
149	Robert Rossachacj 110 E. Knowles Ave. Glenolden, PA 19036	
150	Andrea Saunders Bethlehem, PA 18015	
151	Juliet Englander 211 Delancey St Philadelphia, PA 19106	
152	Laura Fake 443 W High St Womelsdorf, PA 19567	
153	Ogden Mitchell 4815 Locust St Philadelphia, PA 19139	
154	Suzanne E. Webster Roberson 108 Webster Avenue Downingtown, PA 19335	
155	Chris O. 823 Dover Rd Wynnewood, PA 19096	
156	Eden Kahle 3014 Poplar St Philadelphia, PA 19130	
157	Gary Lewis 111 Hidden Hollow Ct. Phoenixville, PA 19460	
158	Felicity Jeans 1601 Pughtown Road Kimberton, PA 19442	
159	Robert Lambert 113 W. Allens Ln. Philadelphia, PA 19119	
160	Bill Roseberry 823 Cathill Road, P.O. Box 496 Sellersville, PA 18960	

161	Michael Cloud 208 Cinnaminson Avenue Palmyra, NJ 08065	
162	Marielle Lerner 328 Dawson St. Philadelphia, PA 19128	
163	Jennifer Holmes 438 S 44th St Philadelphia, PA 19104	
164	Donald Charles 1868 Bertram Road Huntingdon Valley, PA 19006	
165	Michele Schwartz 229 Overlook Rd Morgantown, PA 19543	
166	Lorraine Heagy 6 Sussex Place Lititz, PA 17543	
167	Larry Gaugler 3793 Chestnut St Emmaus, PA 18049	
168	Aida Berzins 26 S. Pennock Ave Upper Darby, PA 19082	
169	Jennifer Clark 704 Pine Ridge Rd Media, PA 19063	
170	Harry Heatherby 170 Deacon Dr Norristown, PA 19403	
171	Kelly Riley 1343 Needham Cir PA, PA 19440	
172	Stephen Kolter 640 Nutt Rd. B204 Phoenixville, PA 19460	
173	Stacey Butterfield 2625 Poplar St Philadelphia, PA 19130	
174	Audrey Marsh Media, PA 19063	
175	Gail Clifford 224 Trenton Rd. Fairless Hills, PA 19030	

176	Lauren Foley 1151 Sterigere St Norristown, PA 19401	
177	William Fraser 2517 E Boston St Philadelphia, PA 19103	
178	Carol McGrath 2525 Cherry Ct Narvon, PA 17555	
179	Thom Fistner 620 S. Bergen St Bethlehem, PA 18015	
180	Joseph Bridy 709 Morris St Philadelphia, PA 19148	
181	Josh Maxwell	Mayor of Downingtown
182	Bob Redfern Media, PA	
183	Carol (Knotts) 6 Graystone Dr. Chadds Ford, PA 19317	
184	Jerry McMullen 200 Hillside Drive Exton, PA 19341	
185	Peter Licon One Alpha Dr Elizabethtown, PA 17022	
186	Douglas M. Spencer, M.D. 141 Kendal Road Kennett Square, PA 19348	
187	Rebecca Britton 211 Andover Dr Exton PA 19341	
188	Alison Moulden Uwchlan, Downingtown PA	
189	Andrea Cauble Exton, PA	
190	Brenda Grove West Chester, PA	
191	Ellen Schadl Chester County	
192	Hope Springs Farm	
193	Lisa Mazzaresse	

194	Ellen Gerhart 15357 Trough Creek Valley Pike Huntingdon, PA 16652	
195	Robin Bunt	
196	Beata Star	
197	Karen Steele	
198	Gina Henderson Rogers	
199	Jeannette McCreary	
200	Adam Kapp	
201	James Wisdom 1531 Dowlin Forge Rd Downingtown, PA 19335	
202	Paula Heeb	
203	Fran Sieber 46 May Apple Drive Downingtown, PA 19335	
204	Rhyan Grech 4609 Springfield Ave. Philadelphia, PA 19143	
205	M Doherty 855 N Park Rd Wyomissing, PA 19610	
206	Carla Puppin 1010 Carpenter St Philadelphia, PA 19147	
207	Marguerite Brooke Beazley Exton, PA	
208	Janine Galen Downingtown PA	
209	Bob and Marylou Starner 450 Park Rd Downingtown, PA 19335	
210	Wayne Helms	
211	Robin Helms	
212	Robert John McMonagle Wallingford, PA	
213	Kimberly Swing	
214	Croitiene ganMoryn 6211 SE 24 <sup>th</sup> Ave Ocala, FL 34480	
215	Catherine Roundy 1355 Wisteria Dr Malvern, PA	

216	Chris Knight 731 Jacques Circle Chester Springs, PA 19425	
217	Stephanie C. Mitman Chester County	
218	Adrienne Drexel	
219	Beth Hollywood Chester County	
220	Lorinda McHugh	
221	Donna Sue Taylor	
222	Leslie Celia Chester County	
223	Sharon Yates 61 Kirby St Valley Township, PA	
224	Sally Campitelli Glen Mills, PA 19342	
225	Douglas H. McCord 365 Devon Drive Exton, PA 19341	
226	John Collier 174 Milbury Road Coatesville, PA 19320	
227	Larisa LaBuda	
228	Julie Droluk 2177 Beaver Hill rd. Chester Springs, PA 19425	
229	Jeff VanKirk Downingtown, PA	
230	Stephen Kolter	
231	Ann Buki 56 Kimberwyck Lane Exton, PA 19341	
232	Bridgett Taylor	
233	Patrick Blank Chester County	
234	E. Jennings Chester County, PA	
235	Arthur Steinberger 147 Palsgrove Way Chester Springs, PA 19425	
236	Eileen Wolkomir	
237	Lee Wisdom	

238	Jessica Becker Dowlin Forge Rd. Downingtown	
239	Janet Marchetti Uwchland Township	
240	Sara Shute Little Conestoga Road Glenmoore, PA	
241	Shelly Klenk	
242	Janice Mancuso	
243	Susan W. Hubickey West Chester, PA	
244	Sheryl McClelland 1191 N. Manor Road Honey Brook, PA 19344	
245	Rochelle Rabin 99 Old Forge Crossing Devon, PA 19333	
246	Valerie Gilbert	
247	Melissa DiBernardino	
248	Melissa Marshall, Esq. P.O. Box 408 1414-B Indian Creek Valley Road Melcroft, PA 15462	Mountain Watershed Association
249	Aaron J. Stemplewicz, Esq. 925 Canal Street 7 <sup>th</sup> Floor, Suite 3701 Bristol, PA 19007	Delaware Riverkeeper Network
250	Joseph Otis Minott, Esq. 135 South 19 <sup>th</sup> Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
251	Alexander G. Bomstein, Esq. 135 South 19 <sup>th</sup> Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
252	Kathryn L. Urbanowicz, Esq. 135 South 19 <sup>th</sup> Street, Suite 300 Philadelphia, PA 19103	Clean Air Council

**1. Comment**

Please do not approve new permits for the crossing of Little Conestoga in Upper Uwchlan Township.

This site in question is located within the headwater drainage of Marsh Creek, Marsh Creek Lake and the East Branch of the Brandywine Creek.



This drilling mud with bentonite clay is harmful to our streams, aquatic plants and fish, and our drinking water. This is a risk to our wetlands and our aquifers. There is no guarantee that this drilling will not impact private well water.

Also, on page 4 this has been incorrectly identified area as being in Uwchlan Township, so I ask that you consider the re-eval request invalid since this information is inaccurate. (1)

**2. Comment**

The installation of pipelines in my community has caused major disruption to the health of the environment and continues to disrupt the aquifer that is used by residents.

As a citizen of Upper Uwchlan Township I ask that you deny the PADEP Section 105 Permit No. E-15-862, PA-CH-0100.0000.RD (SPLP HDD#S3-0290).

The process used to approve is unfair. The company is pressuring the residents and harm is being done to the environment that cannot be corrected. (2)

**3. Comment**

As a concerned resident of Upper Uwchlan Township, I request that any new permits be denied for the Mariner pipeline. This pipeline is creating havoc on what was once a pristine Pennsylvania land. No amount of money that this pipeline is throwing off is worth harming the emergency reservoir that is Marsh Creek Lake. (3)

**4. Comment**

I am writing to you as an elected official in Chester County, as a taxpayer and not representing the board but only myself. It is my understanding there will be a re-evaluation with the Pennsylvania Department of Environmental Protection of the drilling for Mariner East 2 20" pipeline in Upper Uwchlan Township. I would like to be sure the fact that there were two inadvertent returns or "IRs" during the installation of the 16" 2X pipeline in 2017 are taken into account. As I understand it an IR is lost drilling mud that comes up through the ground returning to the surface. This drilling mud with bentonite clay is harmful to our streams, aquatic plants and fish, and our drinking water.

This site in question is located within the headwater drainage of Marsh Creek, Marsh Creek Lake and the East Branch of the Brandywine Creek.

I am asking that based on this danger DEP deny any new permits. It is clear that based on the risk to our wetlands and our aquifers no new permits should be approved. There is no guarantee that this drilling will not impact private well water. Please feel free to contact me. If permits are going to be considered I request public hearings be held. (4)

**5. Comment**

As a resident and a concerned citizen in Chester County, PA, I am urging you to please do not approve of the new permits for the drilling of the Mariner East 2 pipelines in Upper Uwchlan Township. This site in question is located within the headwater drainage of Marsh Creek, Marsh Creek Lake and the East Branch of the Brandywine Creek.

The combination of drilling mud and bentonite, along with the potential for inadvertent returns (IRs) poses enormous risks to local streams, wetlands, and aquifers, aquatic life, and our drinking water supply. In addition, there is no guarantee that this drilling will not impact private well water.

Based on these threats to the environment and the surrounding community, I am requesting and urging that the DEP deny any new permits for the construction of Mariner East 2 in this area.

Thank you, and please take my concerns into considering when making this critical decision. (5)

**6. Comment**

I am writing to express my grave concerns about potential negative impacts that could occur from Sunoco/ Energy Transfer Partners' plan for horizontal directional drilling (HDD) under Marsh Creek, Marsh Creek Lake, and East Branch Brandywine Creek. Sunoco/Energy Transfer Partners has a long history of frac-outs and spills into waterways of the Commonwealth over the past 28 months. Marsh Creek State Park is a popular recreation area and a well-known destination for swimming, boating, fishing, and enjoyment of the nature. An inadvertent return into Marsh Creek State Park's waterways would compromise their biological, chemical, and physical properties, putting Marsh Creek State Park at risk of contamination and permanent harm. Before making any decisions, I urge DEP to 1) require Sunoco to submit data to justify that deeper drilling could be performed safely and 2) require Sunoco to fully analyze the alternative route it referenced in its reevaluation to assess whether pipeline construction could be done with less impacts to sensitive resources. Thank you for your consideration. (6-180, 185, 204-206)

**7. Comment**

I am writing to urge the Department of Environmental Protection (DEP) to advise Sunoco to consider alternatives to the planned HDD for Mariner East 2 between Little Conestoga Road and a point southeast of Highview Road in Upper Uwchlan Township, Chester County. The planned HDD work will lead to serious environmental concerns such as "inadvertent returns" near the Marsh Creek Lake that will bring upon negative effects to the local water supply. As mayor of a community that relies on water from this area for its citizens and a board member of the Downingtown Municipal Water Authority, I believe it is in the best interest of our residents for DEP to require Sunoco to seek a less potentially harmful location.

My hope is that DEP takes the validated concerns of the residents of Chester County seriously and acts swiftly to protect our residents, our environment, and our natural resources. (181)

**8. Comment**

Please protect the area of Marsh Creek. This is an area needs to be protected from the dangers of the ETP project that could endanger the lake and water supplies.

Has the evacuation or emergency plan been properly assessed and reviewed? Are residents safe or being put into harms way? Please as the authority agency please review and see if this truly is the best and safest option for the residents of PA.

Please review the entire plan and make sure what is best for the people of PA is done not just the easiest and quickest way for ETP/Sunoco.

There have been enough frack outs from this project and we cannot allow yet another area to be destroyed by this project.

We need companies working with our land and homes to be completely transparent and select the best option for the residents not their bottom line. These companies should work side by side in working with authorities for emergency plans and protection of the environment.

A What we have seen so far is haphazard mistakes and poor planning with not and adequate emergency plan available to date. No longer can the agencies built to protect constitutes, residents and the land of PA stand by and allow this destruction and potentially dangerous project take place any more. Please stand up for me and my family along with all the families along these pipeline project. This is not progress for anyone just money for ETP/ Sunoco.

Change cannot happen until we have leaders who truly care and believe in their residents. Change is possible and can start with you.

Thank you for your time with respect to this serious matter. (86)

**9. Comment**

Sunoco's history of drilling and the issues resulting from frac-outs, contaminated water, lack of in-depth planning, and their pattern of taking shortcuts can only lead anyone following their request to perform HDD in this section to the conclusion that it is in their own short sighted best interests to perform HDD in this pipeline section. Marsh Creek, nearby wetlands, and the communities interests and concerns are not to be considered. They have done this repeatedly. This section needs to be relocated to north of the PA turnpike. (182)

## **10. Comment**

Sunoco is proposing to use horizontal directional drilling (HDD) to install its 20-inch Dragonpipe (Mariner East 2) pipeline between Little Conestoga Road and a point southeast of Highview Road in Upper Uwchlan Township, Chester County.

This cannot go forward. the dangers to drinking water, Marsh Creek Lake, wetlands & streams due to the fracking proposed and the eventual permanent damage to the environment are urgent considerations. An alternative plan further from this area (north side of the PA turnpike) is acknowledged as a 'safer' drilling area. But it is not being considered.

Sunoco's drilling mud (which includes a variety of materials in addition to clay) will migrate toward the lake from the points at which the bore crosses through ground water. That will happen at several points along the route. In fact, Sunoco "lost" 1,500 gallons of drilling mud at one point during the 2017 drilling. It probably went into the groundwater. Since groundwater can migrate very slowly, it may take months or years to know whether the lake water has been contaminated. This is another reason that Sunoco should have considered alternatives.

Please stop this from going forward as proposed by those who are in a hurry to run this dangerous pipeline through our wetlands and residential areas without any forward-looking concern for its impact.

Thank you for listening. (183)

## **11. Comment**

I am writing to oppose Sunoco/ETP's plan to use horizontal directional drilling (HDD) to install the Mariner East 2 pipeline through Upper Uwchlan Township in the vicinity of Marsh Creek Lake. The geophysical structure of this area has many fractures that lend themselves to inadvertent returns in the drilling process - as proven during the installation of ME2X. HDD would endanger the area's wetlands as well the drinking water of residents in this area. Sunoco consistently avoids serious consideration of alternative routes for their convenience, threatening the health, safety, and welfare of those in the path of the Mariner East Project. HDD through this sensitive area should be prohibited. (184)

## **12. Comment**

I live in Chester County. I see the plans to do horizontal drilling to install another large diameter pipe in the Marsh Creek area. "Mariner 2 East." Please, please do not permit any more pipelines in Pennsylvania at all. The chances for "frac-outs" in which drilling mud seeps to the surface, is high in the proposed area. Also once the pipeline is working, although the chance of a major leak may be small, the consequences of the leaked gas igniting with a huge explosion would be catastrophic.

The entire Mariner 2 East is a windfall for Sunoco, but a potential disaster for the population in the area. And all for what purpose? Sending liquified gasses to Europe for companies there to make more plastics.

Thank you for reading this, and I hope you will follow your consciences and not the profit-making wishes of the oil companies. (186)

### **13. Comment**

The evaluation plan for SPLP pipeline segment S3-0290 is not adequate. In addition to the analysis done showing inadequate information, the analysis itself is not adequate.

Horizontal Directional Drilling (HDD) is the method of installation being used to install Mariner 2 and 2X. This is non-standard, or, other than recognized industry practice on pipeline installation. Based on information and belief, Sunoco Pipeline LP, has not demonstrated how they will clean up a spill of NGL's at low depth from surface in this case up to 200 feet below surface. When used in more urban or populated areas in the past, HDD has been frequently used for small diameter steel utility lines and PVC piping. While there are standard practice guidelines, there are no regulations in place for HDD in Pennsylvania DEP to address. The permits that the Department of Environmental Protection (DEP) put in place are for responses to inadvertent returns, NOT mitigation, prevention, or clean up; of release of NGL's and their unique characteristics.

Proper assessment, mitigation, and preparedness plans for this natural resource should be put in place as defined by Title 25 §105.17 and the provisions thereof; including, but limited to, the Clean Streams Act. Taking into consideration the HDD experimental nature of the project including depth, topography of land formations, geological formations and the unique characteristics of HVL's. This should include full study of ALL Chester County Areas that could have an affect on my public drinking water supply.

As a parent concerned with safety of my families drinking supply, a consumer of the public water, and as a homeowner concerned with preserving the value of my home and the economic vitality of the region; the lack of regulations, lack of study of subsurface release at low depths, and lack of mitigation to those releases has me concerned.

Water Resources/Marsh Creek Watershed/Marsh Creek State Park, this is an important water resource for Chester County especially in times of water scarcity. The Watershed is managed by the Chester County Water Resource Authority and is a high quality water source as characterized by the DEP; but, qualifies as exceptional quality water source per DEP application received by DEP Secretary's Office October 6, 2016.

Marsh Creek Lake is the closest State Park to my home. The lake, and its headwaters, the Marsh Creek Great Marsh is an unusually sensitive area (USA). The land is entitled to the conservation of the natural, scenic, aesthetic, and historical values of state parks; and should be given first consideration as stated in the PA Bureau of State Park's mission and in Title 17. Mariner proposed 20 & 16 inch lines runs dangerously close to this area.

In CFR §195.6 Unusually Sensitive Areas (USAs). As used in this part, a USA means a drinking water or ecological resource area that is unusually sensitive to environmental damage from a hazardous liquid pipeline release. Further, 195.6. 2 (a) Source Water Protection Area (SWPA) for a CWS or a NTNCWS that obtains its water supply from a Class I or Class IIA aquifer and does not have an adequate alternative drinking water source. Where a state has not yet identified the SWPA, the Wellhead Protection Area (WHPA) will be used until the state has identified the SWPA. The modification is through or precariously close to this area.

49 CFR §195.6 - Unusually Sensitive Areas (USAs)As used in this part, a USA means a drinking water or ecological resource area that is unusually sensitive to environmental damage from a hazardous liquid pipeline release. (b) states; An USA ecological resource is: (1) An area containing a critically imperiled species or ecological community; (2) A multi-species assemblage area; (3) A migratory waterbird concentration area; (4) An area containing an imperiled species, threatened or endangered species, depleted marine mammal species, or an imperiled ecological community where the species or community is aquatic, aquatic dependent, or terrestrial with a limited range; or (5) An area containing an imperiled species, threatened or endangered species, depleted marine mammal species, or imperiled ecological community where the species or community occurrence is considered to be one of the most viable, highest quality, or in the best condition, as identified by an element occurrence ranking (EORANK) of A (excellent quality) or B (good quality). Title 35 P.S. Health and Safety § 721.2 (a) Findings.--The General Assembly finds and declares that 1) An adequate supply of safe, pure drinking water is essential to the public health, safety and welfare and that such a supply is an important natural resource in the economic development of the Commonwealth. (2) The Federal Safe Drinking Water Act provides a comprehensive framework for regulating the collection, treatment, storage and distribution of potable water. (3) It is in the public interest for the Commonwealth to assume primary enforcement responsibility under the Federal Safe Drinking Water Act. (b) Declaration.--It is the purpose of this act to further the intent of section 27 of Article I of the Constitution of Pennsylvania by: (1) Establishing a State program to assure the provision of safe drinking water to the public by establishing drinking water standards and developing a State program to implement and enforce the standards. (2) Developing a process for implementing plans for the provision of safe drinking water in emergencies. (3) Providing public notice of potentially hazardous conditions that may exist in a water supply. Safe transportation of pipelines requires DEP perform this work before permits are granted to ensure Safe Transportation. DEP application received by DEP Secretary's Office October 6, 2016 confirms this area is a USA.

Under PA Title 25 Dam Safety and Water Management Section § 105.2. Purposes. The purposes of this chapter are to: (1) Provide for the comprehensive regulation and supervision of dams, reservoirs, water obstructions and encroachments in the Commonwealth in order to protect the health, safety, welfare and property of the people. (2) Assure proper planning, design, construction, maintenance, monitoring and supervision of dams and reservoirs, including preventive measures necessary to provide an adequate margin of safety. (3) Assure proper planning, design, construction, maintenance and monitoring of water obstructions and encroachments, in order to prevent unreasonable interference with water flow and to protect navigation. (4) Protect the natural resources, environmental rights and values secured by PA. CONST. art. I, §27 and conserve and protect the water quality, natural regime and carrying capacity of watercourses.

Title 25 § 96.3 (g) Functions and values of wetlands shall be protected pursuant to Chapters 93 and 105 (relating to water quality standards; and dam safety and waterway management). Finally, §105.17. Wetlands and all its related parts, Wetlands are a valuable public natural resource. This chapter will be construed broadly to protect this valuable resource.

PA State Title 17.1. State Parks §2000 Natural Area policy states in part; Areas within State Parks containing outstanding, unique or sensitive resources should be set aside for protection through designation as Natural Areas to ensure their continued quality for future generations. Further, in §17.3 General management guideline. The protection of Natural Areas will be guided by the need to maintain their significant ecological values. Generally, physical and biological processes will not be subject to direct human intervention. Activities which interfere with these processes or threaten to degrade the inherent values of these areas will be prohibited. Management of surrounding lands may not adversely impact these areas.

The Downingtown Region and West Chester Region in Chester County; and, the City of Wilmington and Northern New Castle County in the State of Delaware rely on this reservoir. The reservoir has maintained its exceptional quality water due to unique bowl shape of topography and protections by multiple surrounding political subdivisions. The PA DEP permits indicate 401 Clean Stream permits were issued under the 105 permits; however, these permits only looked at installation of pipeline not potential leaks during operations.

The Marsh Creek State Park is connected to, and a part of, the Marsh Creek Great Marsh Watershed. The Marsh has been identified as the Marsh Creek Lake's headwaters. This watershed has a unique bowl formation associated with the topography. The groundwater funnels through karst formations particularly susceptible to releases of HVL's. The lands have national, regional and local protective ordinances. The surface water is of exceptional ecological significance, and qualifies under, Title 25 §93.4b (b) (2). The wetlands are of significant Value exhibiting 2 qualifiers under PA Code §105.17. First, §105.17 (1) (i) flora and fauna

listed as threatened or endangered. Also §105.17 (1) (iv) groundwater and surface water quality and quantity of drinking water. The area is home to 2 state rare natural communities, 7 species of concern, and is listed as a “resource to be protected” by Chester County’s Watershed Plan.

As a consumer of the public water I am concerned with possible water scarcity that could result should a leak event occur within the watershed with or without ignition. As a parent and a citizen of Pennsylvania I have inherent rights to this area and want to ensure the value of these natural resources is preserved for my children and the subsequent future generations in my family. Furthermore, the Marsh Creek State Park is a source of economic prosperity for the region. Proximity of my home to this natural resource adds to the overall value of my home.

The DEP must perform due diligence for this water resource as outlined by state law regardless of current policy anything less is negligible should a leak occur without proper study securing the public’s rights and resources.

<https://gcc01.safelinks.protection.outlook.com/?url=http%3A%2F%2Ffiles.dep.state.pa.us%2FPublicParticipation%2FPublic%2520Participation%2520Center%2FPublicPartCenterPortalFiles%2FEnvironmental%25&data=02%7C01%7Cra-eppipelines%40pa.gov%7C9c09ba60d07c408d681a08d6ee7158a8%7C418e284101284dd59b6c47fc5a9a1bde%7C0%7C1%7C636958567921975566&data=k0tasfl1Iz%2Fn%2BrXPqXG83sawbBJeye%2FMBTyUVQjLvIE%3D&reserved=020Quality%20Board/2017/March%2021/Marsh%20Creek%20Petition/Marsh%20Creek%20Petition.pdf> and should be considered in its entirety. (187, 203, 207-209)

#### **14. Comment**

My comment is regarding the section of pipeline S3-0290.

The probability is high for a significant and catastrophic effect on my local ground water. Alternative routes should be explored fully before taking this route.

This pipeline is ruining our community, flooding streets, caving in homeowners properties, forcing them out of their homes. It never should have been allowed. The least you could do is make them explore alternate routes.

You need to hold them accountable. (188)

#### **15. Comment**

I am against the issuance of new permits related to the drilling for Mariner East 2 20” pipeline in Upper Uwchlan Township.

I am concerned that there were 2 Inadvertent Returns during the installation of the 16” 2X pipeline in 2017.



Drilling mud with bentonite clay is harmful to our streams, aquatic plants and fish, and our drinking water.

This site is located within the headwater drainage of Marsh Creek, Marsh Creek Lake and the East Branch of the Brandywine Creek.

Please deny the new permits based on the risk to our wetlands and our aquifers. There is also no guarantee that this drilling will not impact private well water.

I love and use Marsh Creek State Park and fear the damage this drilling will do to our community. (189)

#### **16. Comment**

Briefly, I am against ME2 and drilling anywhere by a private firm particularly for no common good. I say this as a stockholder in Energy Transfer and I'm aware of their many problems in their operations. Accidents are to be expected based on their history and that of other firms.

The proposed route through an area which will potentially feed into Marsh Creek Lake certainly has the potential for public harm by negatively affecting our drinking water. But before that happens, any chemical releases by way of outpouring of the drilling mud will certainly affect wildlife in the wet lands.

It is time to think of the future and the common good instead of prioritizing corporate profit. This firm's projects NEVER should have been treated as a public project when it is intended for transport materials for plastic at a site outside of the U.S.

I urge you to face facts and act accordingly. (190)

#### **17. Comment**

It is unconscionable that Sunoco has refused to consider an alternate route for the pipeline in this section, where it runs very close to Marsh Creek Lake. This lake is a source of drinking water for many people in Chester County. Contamination of the water is a likely possibility given the problems that they have had thus far with their drilling.

Please force Sunoco to consider other routes and not risk the contamination of the drinking water at March Creek. (191, 192)

#### **18. Comment**

I am a resident of Glenmoore living near Marsh Creek. I understand Sunoco is proposing to use horizontal directional drilling (HDD) to install its 20-inch Dragonpipe (Mariner East 2) pipeline between Little Conestoga Road and a point southeast of Highview Road in Upper Uwchlan Township, Chester County. The groundwater in this part of Chester County drains into Marsh Creek Lake, and the lake is the source of drinking water for a large section of the county. There is a good

chance that Sunoco's drilling mud (which includes a variety of materials in addition to clay) will migrate toward the lake from the points at which the bore crosses through ground water. That will happen at several points along the route. In fact, Sunoco "lost" 1,500 gallons of drilling mud at one point during the 2017 drilling. It probably went into the groundwater. Since groundwater can migrate very slowly, it may take months or years to know whether the lake water has been contaminated. This is another reason that Sunoco should have considered alternatives.

This would impact the entire area and the health consequences would be grim at best. Properties values will plummet. This is not a conscionable decision. This needs to be blocked. How do we protect our resources and our health? (193)

### **19. Comment**

Sunoco reported two inadvertent returns ("frac-outs") in this area, in which drilling mud surfaced at an unintended spot along the right-of-way. The new drilling plan calls for the pipe to follow essentially the same route, although it will be somewhat deeper (roughly 25 feet at the most). Frac-outs can probably be expected at the same locations, one next to a wetland, and the other in a small stream within the wetland.

Releasing drilling mud into a wetland is a violation of DEP regulation. Sunoco has an extensive and well-documented history of violations, with little or no serious consequence. Given that Sunoco receives little more than a slap on the wrist, there is no incentive for this company to consider any alternatives. It will, instead, simply plow ahead, ignoring any established rules or regulations, knowing full well that DEP will turn a blind eye to these infractions. Sunoco claims that the bentonite clay that it uses is harmless, but Sunoco also refuses to release information on the other chemicals used, claiming the information is proprietary. Clean-up costs and health costs associated with this travesty far out weigh any touted benefits of overseas plastic production. It is time for the DEP to step up and actually protect the people and environment of Pennsylvania instead of kowtowing to this bad actor. Just look at its track record, both here and on other projects.

We unfortunately have had first hand experience with Sunoco's refusal to either reroute or otherwise alter its drilling plans through wetlands. When asked by the Army Corps of Engineers to consider alternatives, Sunoco refused. Again, this company operates as though it is above any law, rule, regulation, standard, or ordinance that the rest of society must comply with. It has no reason to think otherwise. (194)

### **20. Comment**

Please consider an alternative route for the S3-0290 pipeline. It potentially will affect many people's drinking water. There is a safer route that has not been given consideration. Please reconsider. Drinking water needs to stay as clean as possible! Profits should not stand in the way of people's health. (195)

**21. Comment**

Please consider an alternative route for the S3-0290 pipeline. It potentially will affect many people's drinking water. There is a safer route that has not been given consideration. Please reconsider. Drinking water needs to stay as clean as possible! Profits should not stand in the way of people's health. (196)

**22. Comment**

Please no HDD near Marsh Creek lake, it's a beautiful resource that many rely on for water and recreation and should be protected. (197)

**23. Comment**

Save Marsh Creek Lake and her watershed! Say no Sunoco! (198)

**24. Comment**

These pipelines and their associated projects are destroying our watering systems. They need to be stopped. Cancer cases are on the rise because of these sloppy projects.

There is no accountability, look at what is happening on the pipeline construction in West Chester. Sink holes, and chemicals pouring out of the ground. Residents are being lied to constantly. (199)

**25. Comment**

Sunoco is proposing to use horizontal directional drilling (HDD) to install its 20-inch Dragonpipe (Mariner East 2) pipeline between Little Conestoga Road and a point southeast of Highview Road in Upper Uwchlan Township, Chester County.

I am vehemently against this proposal. I have seen the damage and destruction wrought by Sunoco and Energy Transfer Partners near my home in Chester County. They have been cited numerous times for violations throughout this project. My understanding was that the Pennsylvania Department of Environmental Protection had suspended all reviews of clean water permit applications and other new construction permits for ETP and subsidiaries until further notice due to non-compliance after an explosion in a pipeline in Beaver County.

In its plan, Sunoco has steadfastly refused to consider any alternatives to the approach it has chosen, despite the fact that this route will likely result in frac-outs in the vicinity of wetlands and Marsh Creek Lake, which is a source of drinking water for a large section of the county.

I strongly urge you to reject this project in its entirety, or at the very least to require Sunoco to choose a different route. Pennsylvanians do not want this pipeline. We will experience no benefits from it and will likely experience harms to our health and safety (not least from the climate damage done by the pipeline's contents.) (200)

**26. Comment**

I am a citizen of Uwchlan Township, Pennsylvania. I live less than one mile from Marsh Creek State Park.

I would like the DEP to represent my interests as a PA citizen and deny any and all permits to Sunoco &/or ETP relating to March Creek and Mariner East 2.

These pipelines have a massive, negative impact on our Pennsylvania communities in order to enrich the shareholders of ETP. That is wrong for Pennsylvania. (201)

**27. Comment**

Sunoco is proposing to use horizontal directional drilling (HDD) to install its 20-inch Dragonpipe (Mariner East 2) pipeline between Little Conestoga Road and a point southeast of Highview Road in Upper Uwchlan Township, Chester County.

This cannot go forward. the dangers to drinking water, Marsh Creek Lake, wetlands & streams due to the fracking proposed and the eventual permanent damage to the environment are urgent considerations. An alternative plan further from this area (north side of the PA turnpike) is acknowledged as a 'safer' drilling area. But it is not being considered.

Sunoco's drilling mud (which includes a variety of materials in addition to clay) will migrate toward the lake from the points at which the bore crosses through ground water. That will happen at several points along the route. In fact, Sunoco "lost" 1,500 gallons of drilling mud at one point during the 2017 drilling. It probably went into the groundwater. Since groundwater can migrate very slowly, it may take months or years to know whether the lake water has been contaminated. This is another reason that Sunoco should have considered alternatives.

Please stop this from going forward as proposed by those who are in a hurry to run this dangerous pipeline through our wetlands and residential areas without any forward-looking concern for its impact.

Thank you for listening. (202)

**28. Comment**

As a parent and homeowner, 43 seminary road in Glenmoore, I would like to voice my concern regarding the Sunoco pipeline. Specifically regarding the potential contamination of our water. Our well water is precious to us and our small children. We love our new life here, hoping to continue on our healthy happy road. We sincerely oppose the Sunoco pipeline. Thank you for considering our concerns. (210-211)

**29. Comment**

I urge you to consider every feasible alternative for constructing the portion of the Mariner East 2 Pipeline (see above) in the most environmentally benign manner.

My family and I live and work in nearby Delaware County. We have been impacted as well by Mariner construction. I teach and research environmental politics and policy at Neumann University in Aston. God is watching as you work to fulfill the mission of DEP in the name of public service. We will all be held accountable one day when we stand before God. (212)

### **30. Comment**

I am writing in opposition to drilling near Marsh Creek ID#S3-0290. This area is central to the community. It is the natural pillar of Chester County. Downingtown especially, is a family town. This town's family's adore Marsh Creek. It is not only part of what makes Chester County, and Downingtown amazing, but it is also a large drinking water source. People flock far and wide to spend a day or a weekend, or their whole Summer (in my family's case) at Marsh Creek. This is a gorgeous and extremely precious State Park, which deserves the utmost protections from dirty fossil fuels, and groundwater contamination. Furthermore, the home values in Chester County are far higher than the average, and this is a degradation of our lands and community. I full object to any pipeline drilling/fracking in all of Chester County, but especially near Marsh Creek! Thank you for your consideration. (213)

### **31. Comment**

I object to Sunoco's proposed HDD plan to install its 20-inch Dragonpipe (Mariner East 2) pipeline between Little Conestoga Road and a point southeast of Highview Road in Upper Uwchlan Township, Chester County.

Sunoco has steadfastly refused to consider any alternatives to the approach it has chosen: HDD along the same right-of-way as the previously-installed 16-inch pipe. As I hope to show in this blog post, there are alternatives that Sunoco should have considered; and they should have presented their arguments for why their chosen plan was better.

Problems with frac-outs. The 16-inch pipe in this area was installed using HDD in 2017. The drilling was begun in May of 2017, and the pipe was pulled through the following November. Sunoco reported two inadvertent returns ("frac-outs"), in which drilling mud surfaced at an unintended spot along the right-of-way. The new drilling plan calls for the pipe to follow essentially the same route, although it will be somewhat deeper (roughly 25 feet at the most). Frac-outs can probably be expected at the same locations, one next to a wetland, and the other in a small stream within the wetland.

In fact, the geophysical analysis required by the DEP as part of the plan shows many potential frac-out locations, so it is quite possible that more than the two reported by Sunoco in 2017 will occur. The geotechnical report concludes: "In general, the geophysical survey results display anomalies indicative of fractures that are possible locations for IRs [inadvertent returns] and/or loss of [drilling mud] along most of the HDD...."

Releasing drilling mud into a wetland is a violation of DEP regulations, and this plan suggests to me that Sunoco is content to use an approach that is likely to create such a violation. Otherwise, they would have given serious consideration to alternatives.

What about drinking water? The groundwater in this part of Chester County drains into Marsh Creek Lake, and the lake is the source of drinking water for a large section of the county. There is a good chance that Sunoco's drilling mud (which includes a variety of materials in addition to clay) will migrate toward the lake from the points at which the bore crosses through ground water. That will happen at several points along the route. In fact, Sunoco "lost" 1,500 gallons of drilling mud at one point during the 2017 drilling. It probably went into the groundwater. Since groundwater can migrate very slowly, it may take months or years to know whether the lake water has been contaminated. This is another reason that Sunoco should have considered alternatives.

What about alternative routes? Sunoco reports that its project-wide analysis, prior to construction, had considered alternative routes and determined they were not "practicable". (Sunoco was required to do an alternatives analysis for this specific plan for the 20-inch pipeline, but apparently did not. Instead, it simply referred back to its original permit application—which also did not provide any information about what alternatives might have been considered.) Sunoco says that it concluded this approach "has the least environmental impacts, taking into consideration cost, existing technology, and logistics". That suggests to me that harm to water resources was very low on the list of considerations.

Sunoco correctly states that a route farther to the south would endanger Marsh Creek Lake. The company concedes that a route farther to the north (on the north side of the PA Turnpike) would be possible, but claims (on little evidence) that the current plan "is the preferred option". The frac-outs on the planned route, they say, would be "readily contained and cleaned up with minimal effect to natural resources".

Please consider denying a permit for this action. (214)

### **32. Comment**

Sunoco is proposing to use horizontal directional drilling (HDD) to install its 20-inch Dragonpipe (Mariner East 2) pipeline between Little Conestoga Road and a point southeast of Highview Road in Upper Uwchlan Township, Chester County.

This cannot go forward the dangers to drinking water, Marsh Creek Lake, wetlands & streams due to the fracking proposed and the eventual permanent damage to the environment are urgent considerations. An alternative plan further from this area (north side of the PA turnpike) is acknowledged as a 'safer' drilling area. But it is not being considered.

Sunoco's drilling mud (which includes a variety of materials in addition to clay) will migrate toward the lake from the points at which the bore crosses through ground water. That will happen at several points along the route. In fact, Sunoco "lost" 1,500 gallons of drilling mud at one point during the 2017 drilling. It probably went into the groundwater. Since groundwater can migrate very slowly, it may take months or years to know whether the lake water has been contaminated. This is another reason that Sunoco should have considered alternatives.

Please stop this from going forward as proposed by those who are in a hurry to run this dangerous pipeline through our wetlands and residential areas without any forward-looking concern for its impact.

Thank you for listening. (215)

### **33. Comment**

My name is Chris Knight and I live at 731 Jacques Cir, Chester Springs PA 19425. I value marsh creek for the countless things it provides. As a child I would swim in its waters, kayak with friends, sail with family, and drink the water it provides to my tap. It is paramount that this resource, this gem, be preserved.

Please reconsider allowing a pipeline to be laid out near marsh creek. S3-0290 must be reconsidered and an alternative that protect this invaluable resource. Infracutions (multiple frac-outs in 2017) from Sunoco's previous drilling in that area proves that they do not care for our local environment. Alternatives exist, but this massive company does not care to look into it. (216)

### **34. Comment**

I am a resident of Chester County and have just recently understood the current plan Sunoco has for its Marsh Creek Drilling.

Like many others, I have limited time to become fully educated on environmental issues, but I am a member of the Chesapeake Bay Foundation and other organizations because I believe our environment is crucial to all living beings, including ourselves.

I believe our watershed is a most important basic need and living currently in a home with an individual well makes this issue even more sensitive for me.

I have tried to read the many documents on websites regarding the HDD drilling in this section of the plan, and I'm sure I have a layman's view of the matter.

I can see that DEP and Gov. Wolf have been keeping stringent tabs on Sunoco and appreciate the work which has been accomplished.

However, I also believe it is the best interests of the citizens and wildlife in the area to keep the risk of frack-outs to as minimal a possibility as can be had.

From the documents I can see, it seems Sunoco has been reticent in its response to previous issues, so I would not expect a change from them.

The watershed of our area is critical to all and once damaged may take years to recover.

NOTE: I believe I am correct in that the current location does not affect my home well area but am sensitive to others in the current drilling path.

I see the mud from a frack-out contains some chemicals but has been deemed not too damaging and am happy for this.

However, I believe the results of the mud reaching the water areas can also include other disruptive possibilities and we should do whatever possible to limit the risk. Dirty water is not only a problem drinking, but also causes issues to wild grass growth and other vegetation which supports our eco-system.

Our environment is already being taxed by changes (man-made as well as not) and adding yet additional difficulties can only cause more damage.

I understand companies have a need to be able to provide product. I have a 401K (I am thankful for this) and can see the stock market reactions and the boards for the large companies and the effects of rising costs.

However, I truly believe Sunoco (and others) should be held to a standard of highest limited risk to our watershed. Fresh water is becoming more and more critical and the earth's ability to filter is harder and harder.

I would prefer Sunoco follow the northern route which helps to limit the affects of possible frack-outs, more than the current route.

Thank you for the opportunity to comment on this and for your consideration. (217)

### **35. Comment**

As a resident living right on Marsh Creek State Park, my drinking water is coming from a well drawn from aquifers that are connected to the Lake. Please don't be the reason that our drinking water, recreation areas and wetlands are ruined. I do not advocate this project at all and ask you to stop it. If you are unable to force an end to this pipeline, make Sunoco move the pipeline away from our resources to an alternative as they have already noted is possible. The economic benefit after the pipeline is finished is a total exaggeration - there is no benefit from lower cost energy when the water in the region is contaminated, that is not a sensible 'trade off'. Please do not allow this to move further. (218)



**36. Comment**

I am vehemently against Sunoco's proposed drilling plan for Marsh Creek (S3-0290). In addition to providing critical drinking water, this park is home to fish, waterfowl, and other wild life that could be impacted. It's also a major recreation area for boating, fishing, and other water activities. All this could be impacted negatively by drilling. The use of this park recreationally has increased dramatically in recent years.

I've been going to this park since I was a kid (am in my 40's). I also boarded my horse at this park, at the state owned stables, for almost 10 years, until a couple years ago when I got my own property. I still visit and ride at this park frequently, and yes we even take the horses swimming. I've spent thousands of hours here, it is near and dear to my heart and a treasure of Chester County. Please do not allow Sunoco to put this valuable economic, recreational, and environmental gem at risk!

Should a for-profit company be allowed to put our beloved Marsh Creek at risk to transport volatile NGL's for export to Scotland and Sweden to make plastic? Is overseas plastic more important than our right to clean water? Absolutely not!

(Even my horse loves this lake, sadly he can't submit a comment, but he would be very upset if his lake was contaminated.) (219)

**37. Comment**

I am sending this email regarding Sunoco's plan to lay pipeline at Marsh Creek State Park in Chester County Pennsylvania. This plan is unacceptable and should be rerouted north at Sunoco's cost. The devastation that would occur to the watershed would be irreparably damaged. The water would be contaminated beyond repair. As a citizen of Chester County, I am strongly against Sunoco's plan! (220)

**38. Comment**

The 16-inch pipe in this area was installed using HDD in 2017. The drilling was begun in May of 2017, and the pipe was pulled through the following November. Sunoco reported two inadvertent returns ("frac-outs"), in which drilling mud surfaced at an unintended spot along the right-of-way. The new drilling plan calls for the pipe to follow essentially the same route, although it will be somewhat deeper (roughly 25 feet at the most). Frac-outs can probably be expected at the same locations, one next to a wetland, and the other in a small stream within the wetland.

In fact, the geophysical analysis required by the DEP as part of the plan shows many potential frac-out locations, so it is quite possible that more than the two reported by Sunoco in 2017 will occur. The geotechnical report concludes: "In general, the geophysical survey results display anomalies indicative of fractures that are possible locations for IRs [inadvertent returns] and/or loss of [drilling mud] along most of the HDD...."

Releasing drilling mud into a wetland is a violation of DEP regulations, and this plan suggests to me that Sunoco is content to use an approach that is likely to create such a violation. Otherwise, they would have given serious consideration to alternatives. This plan has the potential to damage the drinking water from Marsh Creek Lake, as well as nearby wetlands and streams. Please stop this very unsafe and unnecessary pipeline!

The ID number for this section of the pipeline is S3-0290. (221)

**39. Comment**

Please keep pipeline drilling away from Marsh Creek and environs. That is our drinking water, as well as a vital source of water for wildlife and an important freshwater recreational spot for this area. We can't afford to suffer frac-outs, which have been frequent incidences during this process. Consider the people who live here and chose another route for Mariner East 2. (222)

**40. Comment**

I moved here to Chester County PA in 1968 and have chosen to make this beautiful county my lifelong home. Marsh Creek State Park, reservoir, lake and recreational facilities. This beautiful Park was constructed while I was growing up. My friends attending Lionville Jr High School were forced to move from their longtime family home, as were so many families and businesses to make room to create The Marsh Creek Lake. This project was essential for a fresh water supply and flood control. The Marsh Creek watershed is essential to our water supply here in Chester County. The Marshes and tributaries must remain uncompromised. Our water depends on it, especially those of us with private wells to supply our homes with potable water.

In 2017, Sunoco Pipelines experienced 2 IR (Inadvertent returns) of Drilling fluid while installing the 20" Mariner East 2x. With this history of IR's in the area, it is not safe for Sunoco to move on with the HDD as planned for installation of the 16" line. Their Plan is incomplete and inaccurate. Further studies of the geology and hydrology of this location must be required before any new permits are issued.

Please deny the request for the permit until Sunoco corrects the errors on their plan and a complete geological survey of the area is made and studied to see if this area can support his pipeline and HDD. (223)

**41. Comment**

You must stop destroying our land. Too many homeowners have been negatively impacted and lives uprooted. Now you want to destroy Marsh Creek!!!!!!! I'm referring to section S3-0290. Stop the destruction (224)

**42. Comment**

I am writing to voice my opinion about Sunoco/Energy Transfer's request to proceed with HDD in Upper Uwchlan Twp. I encourage you to decline their request.

Sunoco/ET has not been transparent in their work, has failed to answer questions, and has made numerous errors in their work to date. Our homes, our environment, our natural resources, and our general welfare has been adversely affected by their questionable procedures.

Why perpetuate the risks and compromise our ecosystem when there is no salient benefit to the citizens of the state? You have been established to protect our environment - even your name says that - so do not yield your mission to simply permit profit to be made by a corporation. I beseech you to put our environment first and reject the request for additional HDD. (225)

**43. Comment**

Sunoco is proposing to use horizontal directional drilling (HDD) to install its 20-inch Dragonpipe (Mariner East 2) pipeline between Little Conestoga Road and a point southeast of Highview Road in Upper Uwchlan Township, Chester County.

This should not be allowed to continue. It poses a major threat to Marsh Creek Park and the surrounding community. There is an alternate route which is not being considered. I would urge you to look again at the alternate route.

Until a full and thought out plan is considered, please stop this from going forward.

Thank you for your consideration of this matter. (226)

**44. Comment**

This email is in relation to the Marsh Creek drilling plan, S3-0290. Please listen to the citizens that live in this area that depend on Marsh Creek for drinking water. Please have another plan for drilling that doesn't involve the potential for Marsh Creek to become contaminated.

We've seen time after time that it is very easy for drinking water to become contaminated if drilling takes place or a pipeline is near a drinking water source. I am a breast cancer survivor with no means to move any time soon should our drinking water become contaminated. Contaminated drinking water is forever! We've seen how contaminated drinking water affects the people living in the area. Cancers and other illnesses are very prevalent once drinking water becomes contaminated. You can see numerous examples from around the country and in our own state of PA of people developing certain cancers and illnesses when they live around a water source that has become contaminated. You can actually look at entire families that go on to develop the exact same cancers, for example, lymphoma. The contamination affects these people for the rest of their lives.

Please, Please listen to your citizens that live near this water source. Please develop an alternative plan that does not have the likely potential that our water source will become contaminated. You have the power to change this plan. You have the power to keep our residents safe. Environmental damage to water is forever. We've seen

that these incidents can happen very easily, and the consequences to people's health and lives are irreversible. Just think if your family had to live near a contaminated water source. Many times people don't care until it happen to them. You have the power to change this decision

The health of the citizens in our area rests in your hands. Do the right thing. I do not want to live through another cancer; surgeries, chemo, and radiation. And I don't want my family or other people's family members to have to live through these types of illnesses either. These are the types of illnesses that young people die from. I was only 35 when I was diagnosed with cancer.

Thank you for your time and attention. (227)

**45. Comment**

Please do NOT allow permits, drilling, frac outs, etc. at Marsh creek. We kayak there all the time, and I fear we will not be safe to continue if this pipeline occurs due to the nature of the land and the location of the pipeline. This portion of the pipeline has an ID of S3-0290. (228)

**46. Comment**

The pipeline to the marsh Creek area is a terrible idea. Sunoco is a terrible safety record.

For the good of the community urge you to not approve of this pathway. For the sake of drinking water and the wetlands this project must be stopped. Thank you. (229)

**47. Comment**

I am writing to voice my concern regarding the plans for Sunoco to run Mariner East through the headwaters of Marsh Creek.

I have been going to Marsh Creek for decades. This pipeline is an environmental travesty and it is with shock and disbelief that I learned of Sunoco's plans to run it through the park where I've fished since I was a child.

The worst part of this is Sunoco's abysmal record operating these things. They have already shown us that they don't know how to do it without creativity leaks, sink holes, and incredibly dangerous conditions for the residents who live near the pipeline.

This is akin to letting the town drunk, who has a history of wrecking cars, drive our kids to school on a bus!

Please don't let this happen. (230)

**48. Comment**

The current Sunoco plan to drill near Marsh Creek Park will have, as proven by their previous record of egregious offenses, a potentially disastrous effect on the creek and its surrounding areas.

Why don't you take action to prevent this? Are you actually, as your name suggests, protecting the environment?

Please reply to my comment. (231)

**49. Comment**

I am reaching out regarding the plans for Mariner East Pipeline S3-0290. I believe the plans outlined by Sunoco will have a severely negative impact on water quality, wildlife, recreational activities, and the remaining natural landscape.

With this being said, I would implore you to pressure Sunoco to further explore alternative routes or perhaps up their investments in "green" energies since... any other large energy company has already done so.

Thank you for your time. (232)

**50. Comment**

As a lifelong resident of Pennsylvania and a taxpayer, I very strongly oppose Sunoco's plans for this section of the Mariner East 2 pipeline. It will endanger our drinking water in Chester County and endanger our County park. Sunoco and the DEP has a horrible track record with this project and everything Sunoco has been involved with. The destruction and endangering of our county have got to stop. There is no benefit to Pennsylvania from this project.

Please put the people of Pennsylvania above the money-making desires of Sunoco. (233)

**51. Comment**

This plan for S3-0290 has the potential to damage the drinking water from Marsh Creek Lake, as well as nearby wetlands and streams. An alternative must be explored. The risk far outweighs your rewards. (234)

**52. Comment**

Sunoco is endangering our drinking water and local wildlife. Unacceptable. The Marsh Creek drilling project needs to be moved or eliminated. The project also has impact on my property values. What can we do about this? (235)

**53. Comment**

Do not allow this pipeline to go forward. (236)

**54. Comment**

As a citizen of Uwchlan Township, PA, I urge the DEP to represent my interests as a PA citizen and deny any and all permits to Sunoco &/or ETP relating to Marsh Creek and Mariner East 2.

These aquifers are essential to my community, and pipelines that endanger citizens health and well being are wrong for PA.

Thank you for your time. (237)

**55. Comment**

I am writing as I encourage you to think strongly about the choice of the Sunoco pipeline in and around the Marsh Creek recreational space.

This has been a place of enjoyment, retreat, peace, and beauty for the community to enjoy.

For 24 years, my family has been so fortunate to enjoy picnics, swimming, kayaking, dog walking, and relaxing on the beautiful grass.

There is enough conflict, do not jeopardize this space. Big bigger, choose the community and the generation to come.

I do not support ID number for this section of the pipeline, which is S3-0290. The mistakes are not worth the gamble with long term environmental preservation. (238)

**56. Comment**

The evaluation plan for segment S3-0290 is not adequate. We need to protect March Creek Lake it is a source of our drinking water. Sunoco has had no response on how to clean up a NGL Spill. It is your duty to protect the water and the environment. this is all stated in the State Constitution. Sunoco has a long history of violating our laws over 100 violations on your web site. We need to make Pa a place that is safe, secure, healthy and environmentally friendly, Sunoco is destroying our state and natural resources. You will have to answer to our children one day. The citizens have done all they could with in their power. Please deny the permits. (239)

**57. Comment**

I live extremely close to this proposed site and obtain my water from my own well. I have had the water tested and it's been completely clean. Up until now. I can only imagine it being contaminated and the potential impact in my own drinking water but also that for my horses. I've no desire to drink bottled, shower in polluted water, lose property values and be harmed by an entity such as this.

We, locally, pay the long term price for the profits to be earned over the short term by those not even impacted by their own technology and greed.

Yes, keep it out of my backyard, out of all of our backyards. Life's too short. (240)

**58. Comment**

The current plan for Sunoco pipeline S3-0290 has the potential to damage the drinking water from Marsh Creek Lake, as well as nearby wetlands and streams. It also puts homes and nearby schools in close proximity to a potentially dangerous pipeline. Please reconsider the plans for S3-0290 and consider moving the route farther to the north (on the north side of the PA Turnpike), which would drastically contain the risk to Marsh Creek Lake and local schools.

Until Sunoco can demonstrate a way to operate this pipeline without putting lives at risk, we insist all construction be halted and the flow of explosive materials through the existing pipelines be stopped. (241)

**59. Comment**

Sunoco's new plan for Chester County is dangerous for its drinking supply and economic vitality. The evaluation plan for SPLP segment S3-0290 is not adequate. In addition to the analysis done showing inadequate information, the analysis itself is not adequate.

The DEP must perform due diligence for the water resource as outlined by state law regardless of current policy. Anything less is negligible. (242)

**60. Comment**

I have lived in the West Chester area for 18 years now, but I only discovered Marsh Creek State Park for myself four years ago. I had a Groupon and I decided to try Stand Up Paddleboarding. Since then, I have been purchasing a season pass from Marsh Creek Watersports to rent their boards whenever I want.

I go out on the lake early in the morning and forget about my stressful job, my awful commute on that Mario Kart like Derby called U.S. 202, and everything else. For an hour or two, I can completely escape - in a place just 20 minutes away.

A good part of that escape is the wildlife. The Sunoco Pipeline endangers all of this.

ETP has proven time and time again to have little regard for our valuable environment in Chester County. They leave behind a wake of destroyed wells, sinkholes, and uninhabitable homes. Do we really trust them near our valuable state park?! It is my understanding that the water also serves as a resource to the Downingtown community, so it's not just my selfish want for recreation, but concern for the health of my neighbors.

I live in a neighborhood just off of Boot Road and they seem to be running through a "comedy" of errors around the fire house. The stakes are so much higher with such a valuable resource to the community that is Marsh Creek Lake. Please take action against DEP and stop this nonsense.

They are not a public utility. They are not bringing any resources to our community and this will not decrease our utility costs. We all know they plan to ship those resources over seas. (243)

**61. Comment**

Every effort needs to be made to ensure Sunoco takes steps to protect the Marsh Creek area. They should be required to use alternative routes to protect this wetland. The DEP needs to frac-outs don't happen and enforce regulations. Safe drinking water must also be protected. Many people who live in this area use well water. They need to be forced to take every precaution to protect our groundwater and consider all alternatives which will keep the environment safe. Please keep the people who live near this pipeline, their water, and environment safe and protected. (244)

**62. Comment**

I am a resident of Tredyffrin Township, Chester County, and a frequent user of Marsh Creek State Park lake. I have family and friends nearby, and my synagogue is just up the road a bit.

Please do not allow the pipeline to go through Marsh Creek State Park. It is too dangerous. There is real likelihood of the water being affected, and that means drinking water as well as recreational water for many people in the area. It also poses a threat to wildlife. I am told that the proposed section of the pipeline is S3-0290.

Our Pennsylvania Constitution entitles us to clean air and water. Please do not mess that up. It is against our PA Constitution and an absolutely sin to jeopardize this area.

Please leave our wonderful county park and lake alone. Please do not mess up any more drinking water in PA. We're already becoming an ecological nightmare in parts of the state. (245)

**63. Comment**

This plan has the potential to damage the drinking water from Marsh Creek Lake, as well as nearby wetlands and streams.

We need to do all we can to protect and restore the environment!

Green, clean, sustainable energy for all. (246)

**64. Comment**

The fact that people still need to comment on these or that this project is continuing is ludicrous. It's been clear that the DEP does not even consider them when making dire decisions regarding Pennsylvanians' health, safety and the environment which directly affects both.



On the upside, perhaps these comments will aid in current investigations and the inevitable criminal charges & civil suits in the future.

So you need us to explain to you that this is a bad idea because:

The method of installation, HDD, and is understudied and under-regulated?

Because the coating on these pipes has been sitting out for two years when studies show, to keep its integrity, it shouldn't for more than a year?

Because the coating is damaged when pulled through and Sunoco's integrity management and cathodic protection is questionable?

Because there is no remediation plan for when deeply buried pipes leak?

The list and questions could go on and on and you know it all. Do not allow this to continue. (247)

## **65. Comment**

Pursuant to the Corrected Stipulated Order entered on EHB Docket No. 2017-009-L on August 10, 2017 ("Order"), and on behalf of Clean Air Council, Mountain Watershed Association, Inc., and the Delaware Riverkeeper Network ("Appellants"), please accept these comments on Sunoco Pipeline L.P.'s ("Sunoco") re-evaluation report ("Report") for the horizontal directional drilling ("HDD") indicated by drawing number PA-CH-0100.0000-RD (the "HDD Site").

### **1. Sunoco has not adequately analyzed or mitigated the risk of losing of drilling fluid underground or inadvertent returns.**

Last time Sunoco undertook HDD at the Site, Sunoco lost approximately 45,000 gallons of drilling fluid and two separate IRs occurred. Sunoco does not mention the magnitude of the drilling fluid loss at all in its Report summary and glosses over the IRs. The Department needs more information about the circumstances surrounding the loss of circulation incidents, especially given the sheer volume of drilling fluid loss. Sunoco should be required to provide an analysis of the cause of the LOC incidents just as it would with an IR. The Department needs more information as to when in the drilling process the LOC incidents occurred. What was the root cause? How will new measures mitigate this issue for the new pipe?

The magnitude of drilling fluid loss is especially concerning given that the proposed profile "passes through the zone of groundwater" that is the source for the nearby well. A high volume of drilling fluid escaping the borehole could have a number of detrimental impacts on the groundwater. It could infiltrate private wells, sediment and other material could be pushed into wells, or it could seal off or otherwise disrupt the natural pathways of the groundwater, inhibiting the recharge capacity of the aquifer.

In regard to IRs, just because Sunoco reportedly only discovered two IRs does not mean that the LOC did not result in additional IRs. Because of the problematic nature of this site and the vast quantity of drilling fluid loss, there could be other IRs that Sunoco just did not detect. What types of monitoring was Sunoco performing when each LOC occurred? Sunoco glosses over the geologic issues of this site aren't as problematic as they actually are. In fact, the expert in the Hydrogeologic Report states that this HDD site has a "moderate to high risk of drilling fluid loss and IRs."

The current proposal does not mitigate for IRs or LOC. The Department should require additional information regarding this risk, including detailed analysis of the cause of the LOC incidents, an explanation of how the new plans can reduce the risk of IRs and LOC, and a detailed discussion of the on-the-ground monitoring that has and will take place.

**2. Sunoco fails to acknowledge the prior groundwater discharge and the present risk of a groundwater discharge given the 100 ft difference in elevation between the two entry / exit points.**

The proposed HDD site has a 100-foot difference in elevation between the two entry / exit points. See Attachment A, Profiles and Plans. This difference in elevation is problematic because it increases the likelihood of having another groundwater discharge incident.

Groundwater discharge was already a problem at the Site when the first line was installed. In the Report, Sunoco does not provide any information regarding how it will prevent groundwater discharge. Furthermore, the Report summary does not even mention the past groundwater discharge that occurred on the Site, and the Report provides no explanation for why it occurred. In order to avoid a reoccurrence, Sunoco needs to provide an analysis of the past groundwater discharge incident and identify its root cause. The location of the groundwater discharge should be indicated on the drawing of redesigned profile. Sunoco should also prepare a site-specific plan to address how it will prevent groundwater problems from occurring.

**3. Sunoco has not adequately protected drinking water supplies.**

Sunoco again has failed to take seriously the danger its construction poses to drinking water supplies and other water resources. It provides limited information on nearby wells and no plan for avoiding or mitigating impacts. This is unacceptable.

Sunoco must follow the requirement from the Order and conduct an analysis of well production zones. Sunoco should figure out the sources, the recharges, and the connection between the groundwater and Marsh Creek reservoir. Sunoco states that there were "no water well impact complaints" while installing the first pipe at the Site, so it is unlikely to be contaminated this time. Sunoco overlooks multiple issues. First, Sunoco believes that no complaints means no contamination. The presence of

contamination can be properly assessed only with their sampling data, which they have not included with the Report. Second, Sunoco contends that given this track record, there likely will not be any contamination the second time. Relying on this assertion, Sunoco does not list any steps that it is taking to ensure the protection of the owner's drinking supply. What steps can Sunoco take to better ensure this?

As discussed in further detail above, the groundwater is particularly vulnerable because the HDD Site "passes through [a] zone of groundwater" that sources private water supplies. This is made more precarious considering the vast quantity of drilling fluid lost previously. Property owners need to be made aware of the potential impact and LOC could have on their private water supplies.

Sunoco's plans to do not include preventing damage to drinking water supplies. If Sunoco contaminates someone's private water supply, Sunoco simply says it will supply a temporary water source to anyone affected by the drilling. Water buffalos and bottles of water that are not a solution. Sunoco needs to ensure water supplies are not damaged in the first place.

#### **4. Sunoco misrepresents the geophysical survey data indicating the severity of the fracture zone in the southeastern part of the alignment.**

The Hydrogeologic Report states that, "[t]he highest density of potential fracture zones (approximately one every 10 to 25 feet) occurred in the wetlands area in the southeastern part of the alignment that includes the two branches to the unnamed tributary to Marsh Creek..." (emphasis added). Yet Sunoco uses different numbers entirely when describing the severity of the densest concentration of fractured rocks in its summary. Sunoco misrepresents its scientists' conclusions stating that "potential fracture zones crossing the HDD alignment at a frequency of approximately one every 100 to 200 feet in the northwestern part of the alignment, with a greater density generally one every 50 to 100 feet in the southeastern part of the alignment..." (emphasis added). This blatant misrepresentation greatly understates the severity of the fractured rock in the southeastern part of the proposed HDD site. This same area is the site where one IR occurred on June 24, 2017, and a second IR occurred on August 29, 2017. Sunoco even acknowledges that the root cause of the IRs was the "zone of fractured weathered bedrock in the same area as the two IRs." Sunoco's use of numbers that are at a maximum ten times more conservative than the Hydrogeologic Report clouds the Department's ability to properly assess the site's risks.

Sunoco also excludes from its analysis the fact that the Hydrogeologic Report highlights that this same fractured bedrock where both IRs occurred includes a wetland area and two branches of a tributary feeding into Marsh Creek. Not only does the Hydrogeologic Report state that there is a "moderate to high risk" of another IR occurring, but the IR would likely occur in a sensitive area encompassing the tributary which feeds into a protected body of water. Even if the IR occurs in an

upland near the tributary, the Hydrogeologic Report indicates that the topography of the area predominantly flows south to the lake.

It is critical Sunoco provide accurate information regarding the nature of the bedrock at the Site, especially in southeastern part of the alignment. The Department should require Sunoco to resubmit the Report to make these numbers consistent, along with an explanation of why how this discrepancy occurred. Moreover, because these numbers are markedly different, Sunoco should explain how they factored this information into their plans to execute the revised HDD. If Sunoco is operating with incorrect numbers regarding the fractured bedrock that could have massive consequences, especially considering that Sunoco stated the fractured bedrock was one of the causes of both IRs.

#### **5. Sunoco proposes to deepen the HDD profile despite the Hydrogeologic Report that says improved rock quality does not correlate with depth.**

Sunoco's revised plan to deepen the HDD profile runs counter to the Hydrogeologic Report that states higher rock quality does not correlate with depth. The Hydrogeologic Report examined boring samples which indicate the HDD site has highly weathered and fractured rock quality, which the Hydrogeologic Report categorized as "poor." Crucially, the Hydrogeologic Report stated that higher rock quality "did not correlate with depth." This point is articulated further in the Hydrogeologic Report's conclusion that states "deepening the profile does not change the frequency of fracturing characteristic of the competent bedrock at depth." (emphasis added). The expert assessment makes clear that deepening the profile will not lead to higher rock quality.

Despite this expert assessment and the results from the boring sites, Sunoco's plan is to deepen the HDD profile. In its summary, Sunoco's solution "increases the depth in bedrock for a majority of the HDD profile" and increases "the depth of profile an additional 34 feet at the location of the IR..." Such a solution runs counter to the expert's assessment of the site where the IR took place.

Sunoco must justify why it proposes deepening the HDD site contrary to what the Hydrogeologic Report states. Does Sunoco have more information as to why it would be better to drill precisely 34 feet deeper at the location of both IRs? If so, this information should be made public. If not, the Department should ask Sunoco why deepening it would prevent the previous problems.

It is clear that the fractured weathered bedrock in the southeastern part was a contributing factor to both IRs. The Hydrogeologic Report states that similar installation issues should be anticipated for the new HDD line, and classifies the site as a "moderate to high risk" of having another IR. It is unclear how the redesign will prevent IRs and the Report seems to say it won't.

Additionally, Sunoco provides a rock quality designation (RQD) of 0 to 100 and elsewhere 20 to 100. This is non-data. The range provides no useable information for the Department because the deviation is too broad. Sunoco must provide the Department accurate RQD information for the depths it intends to drill. This may require additional surveys or testing.

**6. Sunoco's Best Management Practices (BMPs) are merely boilerplate and do not reflect site-specific mitigation.**

In its proposed BMPs, Sunoco only recites procedures they were supposed to implement anyway, and presumably already used for their original HDD site. The Hydrogeologic Report states that "although the profile on the proposed P&P runs deeper than the as-built profile for the 16-inch line, drilling conditions similar to those encountered during installation of the 16-inch line should be anticipated." (emphasis added). How then will the same problems be avoided if they are engaging in the same practices?

Sunoco also notes that it will undertake enhanced monitoring, but Sunoco needs to provide a lot more specifics. Clearly, the monitoring they were doing before was not sufficient, given that 45,000 gallons of drilling fluid were lost. The Department must know what monitoring was being done before and how exactly Sunoco will improve on this. Also, there must be information on how this will transfer to employees on site. What instructions will be provided to the ground crew? What is the specific plan of enhanced monitoring (more workers walking the sites to look for IRs, a reporting process, etc.)? Whatever the specifics of that plan may be, it must be shared with the Department.

**7. Sunoco should provide information on extending the entry / exit points, so the Department can explore viability of this option.**

Sunoco states that the presence of wetlands and streams adjacent to the southeast entry / exit point prevent the profile from being extended 500 ft further to the southeast. The Department should require more information as to why Sunoco cannot drill further and come on the other side of the wetlands. Currently, the southern entry opens up immediately before a wetland.

Sunoco will then open-trench dig across the wetland, harming a tributary that feeds into Marsh Creek Reservoir along with a forested wetland. Also, driving the drill up where the current entry / exit point exists has proven to be problematic given the decreasing overburden.

Sunoco should provide more information to the Department on the logistics of extending beyond the wetland and what impact this may have on preserving the ecological value of Marsh Creek State Park. This would also allow the profile to pass under the area of the previous IRs at a greater depth, which Sunoco seems to

suggesting would be helpful. The Department cannot assess whether this is a viable option without more information and data.

**8. Sunoco should consider the one-mile reroute, given the proximity to a high trafficked recreational area and the limited environmental disruption.**

Sunoco mentions a potential reroute option but gives it little consideration. The reroute option to the north should be carefully considered, given the proximity of the current path to the reservoir and state park, Marsh Creek, and the limited impact of the reroute. The proposed reroute would travel north under the PA Turnpike, immediately turn east along the PA Turnpike for .7 miles until it crosses Little Conestoga road, then it would travel south back under the PA Turnpike to re-intersect the existing project route. See Figure 1 below.

First, the reroute may better preserve the ecological and recreational value of Marsh Creek. Marsh Creek is designated as a Chapter 93 high quality body of water, visited by recreational users for swimming and canoeing, and supports a robust fishery of trout, shellfish, and wildlife. Sunoco acknowledged that the subsequent IRs that already occurred at this site bled into tributaries which lead to the Marsh Creek Reservoir.

Second, the proximity of the pipeline to a highly trafficked recreational area creates safety concerns that the reroute could help mitigate. On any particular summer day there can be hundreds, upwards of thousands, of visitors each day, making them vulnerable should there be any leak on the line. The reroute mitigates this issue by moving the HDD site to the other side of Little Conestoga Road and allowing the road to serve as an evacuation route.

Third, the geography of the area could make this an ideal scenario to adopt the reroute. Although Sunoco states that it would have to create a greenfield utility corridor and effect previously unencumbered properties, this assessment should be questioned given the satellite data of the area in Figure 1. The land that would be traversed needs to be assessed qualitatively and quantitatively. The majority of the reroute would travel beside the PA Turnpike along the outskirts of a farm. The HDD site that Sunoco proposes cuts across at least a dozen different residential properties, whereas Sunoco states that the reroute “would pass in near proximity or immediately adjacent to five residential home sites.” See Attachment C Regional Geologic Map. In terms of impact, not only would less forested area potentially be impacted given it is primarily farmland, but there would be fewer property owners in its path.

Lastly, Sunoco acknowledges that the reroute is “technically feasible.” Despite failing to provide more information beyond the fact that this reroute would mean more procedural steps for Sunoco and the misrepresentation that more people would be impacted, Sunoco should provide its data for determining that the reroute is “technically feasible,” so the Department can accurately assess whether Sunoco’s

proposed HDD site is actually superior to the reroute. What percentage of forested acreage would be impacted? How close would the reroute's proximity be to the tributaries into Marsh Creek? What construction methods could be utilized for the reroute? The Department's assessment should be viewed within the context of the Hydrogeologic Report, which states that Sunoco's proposed HDD site currently has a "moderate to high risk of drilling fluid loss and IRs." Does the reroute have a lower chance of drilling fluid loss and IRs? How do the impacts of those IRs compare to possible impacts associated with a reroute?

Sunoco must provide more information regarding the viability of the reroute in order for the Department to assess which route better addresses the above concerns.

Thank you for considering these comments. Please keep Appellants apprised of any next steps. (248-252)

Letter – [Clean Air Council – 6-11-19 – Little Conestoga Road Crossing](#)