

**DEP Permit # E15-862 & E23-524**  
**DEP Permit HDD Reference # PA-CH-0421.0000-RD**  
**DEP HDD # S3-0541**  
**Township – Westtown & Edgemont**  
**County – Chester & Delaware**  
**HDD Site Name – Arch Bishop / South Chester Road Crossing**

**3<sup>rd</sup> Public Comment Period**

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**1. Comment**

Arch Bishop and South Chester HDD in Westtown and Edgmont must be stopped. People's private water wells are at risk, particularly if there is no option for public water. Please stop this dangerous drilling now. (1)

**2. Comment**

Sunoco does not and will continue to not comply with the DEP or any local municipalities. Therefore, this project should be shut down completely. Please do not approve this re-evaluation permit.

Please see below from Edgmont Twp. with regards to Sunoco's ability to guarantee clean water to those along the ME Pipeline route:

Edgmont discovered, during this fall, that Sunoco had installed alternative water supplies to properties near its Mariner East II HDD drill easement area without first contacting authorities for advice, permits, or regulations Edgmont researched the matter fully with code officials, electricians, building officials, property owners and water scientists and Aqua public water company to become educated on the topic Edgmont's staff developed a protocol to provide for the permitting of temporary water supply facilities, commonly called water buffalos in an effort to protect the safety, health and welfare of its residents Edgmont has struggled with Sunoco to gain compliance and get permits issued and safety inspections completed for the temporary water facilities already installed Edgmont has discovered improperly

installed electric line in at least one of the temporary water supply systems, once it was able to get the work inspected.

Edgmont has learned that Sunoco has now disconnected some of these alternate water supplies and reconnected households to previously abandoned wells, again without first contacting the authorities for advice, permits or regulations Edgmont researched the matter and developed a series of dormant well testing criteria that it required Sunoco to perform, with satisfactory results, prior to any future reconnecting of residences to their previously abandoned wells and has requested this testing from Sunoco. Sunoco is resisting furnishing the township with the well testing results it requires and continues to re-connect residences to their former drinking water well supplies.

This is very concerning to your elected officials, the Township Manager and administrative staff, who will continue to try to gain compliance from Sunoco. I have copied this e-mail to your state representatives, the Pa DEP and the Public Utility Commission for their information. If you have any questions or concerns, you may also direct them there. (2-3)

### **3. Comment**

Attached, please find my letter of comment on SPLP Response to DEP letter 2-22-18. I truly hope DEP will completely read and take these comments to heart. Residents in the path of ME1 & ME2 have serious concerns for their safety and welfare of their lives, including their healthy supply of private well water.

My name is Michael Di Domenico. I reside at 1530 Woodland Road, Westtown Township, West Chester, PA. Due to the proximity of the proposed Route 352 horizontal drilling site, of which my property lies less than 250', I contacted two hydro-geologists and three well drillers to confirm my suspicions; there is a high likelihood my 405' private water well will be negatively impacted within six months of drilling to include two pipelines.

In August of 2016, I had reached out to Sunoco Logistics' representative, Mr. Donald Zoladkiewicz and one of Sunoco's lawyers, Mr. Curtis Stambaugh, requesting Sunoco Logistics pay for testing my 405' well before drilling commences. This sampling would be a baseline of data for myself and Sunoco Logistics. This request is not unusual, as Sunoco Logistics has agreed to test private water wells within the easement area.

My unique situation is my private water well is the only viable option to supply water for my home. Due to PVC piping used in my home, public water is not an option because of water pressure issues.

My request has been rejected because "You are an elected official of the township. How would that look if we tested your well, and not others? We don't want to set a

precedence." Additionally, Mr. Stambaugh had acted unprofessionally and not in good faith by not returning my attorney's phone calls or requests.

Since 2016, I have had my well water privately tested. With copious amounts of assertion, Sunoco agreed to test my well. I believe we are Location Code WL-12192017-634-01 of the SLP Response to DEP letter 2-22-18, although it's difficult to ascertain from the Well Location Map HDD# PA-CH-0421.0000-RD Chester County, PA map prepared by TetraTech - 4-10-2018.

For Sunoco to state on page 7 of their response is complete deception. We requested a pump yield test along with quality. We were told Sunoco would only perform quality testing, at their cost.

**e. Water quantity test results (pump yield tests) of the private water supplies that may be affected.**

SPLP has notified each water supply well owner within 450 feet of the HDD profile that they have the option to have water quantity tests of their well. To date, water supply well owners have not asked to perform any water quantity tests at any well location.

4. The Report discusses potential changes in water quality, but also needs to discuss potential changes to water quantity, as the potential exists for the HDD bore to adversely impact the yield of private water supply wells. Please describe how this will be done consistent with applicable provisions of the latest versions (February 6, 2018) of the Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan, and the Operations Plan (January 2018).

In addition, both the Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan ("IR Plan") and the Operations Plan require SPLP to offer alternative water supplies to landowners with water supply wells within 450 ft of the drill profile. The best means to protect a water well during the HDD is non-use. Obviously, to the extent a landowner accepts this offer, their water supply should not be adversely affected during HDD activities. Moreover, even if the landowner does not accept an offer of alternative water supply, the IR Plan requires SPLP to address to the satisfaction of the landowner any complaints associated with water quantity during HDD activities. Finally, if a landowner identifies any impact to a private water supply attributable to pipeline construction after post-construction sampling, including impacts to yield, the IR Plan obligates SPLP to restore or replace the impacted water supply to the satisfaction of the private water supply owner.

We have never been offered an alternative water supply. We, and our neighbors along the easement, have never been informed to protect against contamination of our wells by "non-use". In fact, Sunoco's offer for "alternate water supply" may be potable, but how can households do "non-use" of a water supply, to protect against contamination throughout the HDD process with only a tank of water sitting on their

property, from which drinking water can be drawn? How will elderly (and disabled) residents, as in olden day "go down to the stream" to gather buckets or jugs of water from a tank?

According to Pennsylvania DEP, water degradation falls into two (2) categories - reduced water volume or the presence of "constituents" found in higher levels after drilling than before drilling. Constituents can be naturally-occurring, drilling related chemicals, or methane gas that seeps into aquifers and water wells. Whether it be by vertical/"fracking" or horizontal drilling.

The responsibility of Pennsylvania's DEP is to "protect human health and the environment and water". Westtown citizens are not reaping benefits from this gas exportation operation, only headaches and sincere inconvenience.

As with the "fracking" operations in other parts of the state, is Pennsylvania's DEP still of the mindset to put the onus of proof on the homeowner to prove contamination of our water wells within a half mile from a drilling site? There are other residents in our neighborhood being serviced by wells, who have not been tested by Sunoco for water quality and quantity, without hours of telephone conversations.

Will this section of pipeline drilling receive similar numbers of citizen complaints? Will the DEP be ready to handle said complaints, or will the case files sit in some file cabinet? Wouldn't it be prudent for Sunoco Logistics, not a public utility, to pretest the half mile area private water wells, to obtain baseline information for the condition of my, and possibly other wells? DEP should demand from Sunoco compliance with each and every regulation for public water supply. According to the geologists I contacted, AQUA, our local public water supplier, also draws from the exact aquifer into which my well is drilled.

Doesn't the DEP have a responsibility to plan, monitor, and provide safe drinking water, equally, in non-public water systems? Who protects private citizens? Isn't this the mission of the DEP?

I find it incomprehensible, the DEP passes unfunded mandates to Pennsylvania townships, requiring the cleanup of streams, creeks, pond, lakes, etc., to remove phosphorous/nitrates and revert the water quality to that of the 1700's . . . at the cost to taxpayers, yet the DEP has no concern of the condition of private water wells (some of whose quality remains the quality of the 1700's - due to the depth.) Why doesn't the DEP use its power to require Sunoco to have ME2 traverse Westtown in a fashion that would absolutely not adversely affect our private wells?

I understand the 'public comment period' is closing. In a heartbeat, will gladly provide the contact information of the aforementioned, local Chester County, hydro geologists and well drillers, to confirm the necessity of immediate intervention of DEP to make Sunoco comply with each and every regulation that governs and complies with the Federal and Pennsylvania Clean Water Acts.

I look forward to having a telephone conversation with someone at DEP, regarding these comments. Feel free to contact me at the phone number listed below. (4)

[Letter – Michael Di Domenico](#)

#### **4. Comment**

Open comments: DEP Permit #E15-862 & E23-524, DEP Permit HDD Ref #PA CH - 0421.0000 RD

As parents of school age children attending a grade school in the blast zone, and as parents raising a family, owning a home, whose property has been permanently destroyed and altered, and living with 50' feet of the proposed MEII pipeline, to say we are concerned on the proposal for the HDD as well as the overall implementation of the two new proposed pipelines themselves, better known as MEII, is an understatement.

According to the mandate of the PA DEP, the collective protection for PA residents is the primary focus of all decisions and the end goal of any decision agreed upon and set forth. Or, at the very least it should be that way. The commonwealth, the common welfare, the common wellbeing, the common good of countless residents along this MEII pipeline has been disavowed, disregarded, and dismissed by the PUC and the PA DEP. All in favor of and submission to an out of state as well as international entity to drain natural resources from PA and to create them into profit.

The wanton destruction of private property rights, of natural eco systems, of the integrity of water supplies is beyond comprehension. We fully support permanent career job positions in the state of PA. The amount of vehicles on the work sight in our backyard is copious and not one has a PA license tag. Apparently, even the men and women who hold the flags at the entrances to the work sights are brought into the state and are not hired locally. Combined actual facts of using out of state workers, of destroying property, of significantly lowering property values, and of perilously jeopardizing public safety mitigate any claims made by local union officials.

The recent ruling this week of PUC Judge Elizabeth Barnes is a long overdue, much welcome display of common sense. Her knowledge and regard given to the facts and the concerns brought forth by Sen. Dinniman is relief to all of residents living along the MEII.

We implore the PA DEP to take as courageous a step as Judge Barnes and to review its past decisions, acknowledge that perhaps due diligence was not accurately completed, that this entire project has been rushed, been veiled in untruths and misinformation, and ultimately provides NO immediate benefit to the residents of PA, who are bearing all the risks and receiving ZERO rewards. (5)

#### **5. Comment**

Sunoco you are ruining our well. (6)

## 6. Comment

This is a comment on Sunoco's response to the DEP's questions concerning the HDD plan for "Arch Bishop / South Chester Road Crossing".

The DEP is trying to protect the public and the environment. In its response, Sunoco is refusing to do many of the things that the DEP has determined are necessary to fulfill its mission. Here are some examples:

The DEP is asking for "an analysis private water supply well production zones and how the proposed HDD activities will interact with them". Sunoco's long and vague response does not even attempt to describe the local well production zones in the area of the HDD. The DEP should insist on a proper analysis.

The DEP asks for "water quantity tests (pump yield tests) of the private water supplies that may be affected". Sunoco's response is that no well owners have asked for that test. That's irrelevant. Why should the well owners have to ask? If the DEP thinks it is important, Sunoco should do it.

When the DEP asks for more information on bedrock geology, Sunoco says "further fracture trace analysis, geotechnical bore analysis, and investigations of local hydrogeological studies have been and will be done". If additional "analyses and investigations" will be done, what are they? When will they be done? The DEP should insist that Sunoco spell out what it is committing to, and Sunoco should not be permitted to drill until it is done.

The DEP asks for "water well depths, casing depths, and water-level depths (based on a water-level survey)". Sunoco responds that its Attachment 4 contains "water-well depths and water levels if known". But Sunoco has not done a water-level survey. The table of private wells in Sunoco's Attachment 2 lists 45 wells, but the water level in 36 of them is "unknown" or "unavailable". The DEP should require an actual survey of water levels.

In two different places, the DEP tells Sunoco to "provide a geophysical survey" to help delineate fractures in the rock and to understand where the bedrock surface is. Sunoco refuses to do the geophysical survey, saying that its existing borings give it enough information. This is not Sunoco's choice to make. The DEP needs this information to evaluate Sunoco's plans, and the DEP should insist on getting it.

Sunoco cannot begin this work without DEP approval, so the DEP has the leverage to insist that its requirements be met.

I urge the DEP to take a tough line and hold its ground. Sunoco is trying to push the DEP around, but its terrible record in this project so far shows that it needs to be held accountable or it will continue to endanger the environment and the public. Now it the time to stand up to this bullying. (7)

## **7. Comment**

Comments about the horizontal directional drilling at Arch Bishop/South Chester Road Crossing S3-0541 Permit No. E15-862 and E23-524 Westtown and Edgemont Townships Delaware and Chester Counties.

We do not want to see people's wells damaged from this HDD Sunoco's own (limited) data on water levels from its test borings taken on the hill between Routes 3 and 926 indicates that the level of ground water in that area is actually higher than the HDD drill sites at either end of the HDD run. It is only common sense that the ground water will seek a lower exit point (one or both of the drill sites) if it can find a path there.

DEP must demand a water well survey! "water well depths, casing depths, and water-level depths (based on a water-level survey)". The table of private wells in Sunoco's Attachment 2 lists 45 wells, but the water level in 36 of them is "unknown" or "unavailable".

DEP must demand Sunoco to "provide a geophysical survey" to help delineate fractures in the rock.

DEP must insist "an analysis of private water supply well production zones-and how the proposed HDD activities will interact with them". (8)

## **8. Comment**

My property, in the Andover neighborhood, backs up to the corner of Rt 926 and Rt 352.

I purchased the home roughly a year ago, with no knowledge of what was to come. I am a single mother with two children. I put a the majority of my savings into this home for them, and work very hard to continue to maintain it. If I were to put my home on the market now, less than a year later, I would take a very substantial loss, if it were to sell at all.

Beyond that, what is happening immediately behind me is heartbreaking on many levels. (I attached a picture I took this morning to show how close it is.)

First, the construction that has gone on so far in this neighborhood and surrounding counties has been horribly managed. There has been destruction well beyond what was communicated, complete disregard for the families who live here, and many examples of unsafe practices that continue to occur. There is no reason to believe that won't continue if drilling and trenching is allowed to go forward as planned.

Second, I am extremely concerned about the proposed directional drilling, which will be immediately behind my home. There is a high likelihood of events like the sinkholes Sunoco caused in surrounding neighborhoods. I am also concerned about the complete disregard of noise and light ordinances that have happened and continue

at the other end of Andover. Neighbors are already having issues, like water in the basement, as a result of this work. I have concerns about the dust and mess and potential for cracks in the foundation, not to mention the anxiety that constant vibration and noise will cause.

Last, if this work continues, I am very concerned about safety once the pipelines are operational.

Please take all of this into consideration when evaluating Sunoco's plans. The families in this county are counting on you to protect us. (9)

Attachment – [Melinda Welsh](#)

## **9. Comment**

My home is .7 miles from the intersection of 352 and 926, a location where Sunoco proposes to conduct HDD (Horizontal Directional Drilling) for the construction of Sunoco's Mariner East 2 and 3 pipelines.

I have read the DEP's questions and Sunoco's response and am concerned about the following:

- On page 1, DEP states that a licensed Professional Geologist needs to sign and seal the report. Given the density of population in this area, the issues Sunoco has had with HDD just to the north of this location in West Whiteland Township, and the number of private wells in the area, it is critical that a licensed geologist review and sign the portions that relate to the geology of the area.
- On page 4, page 8, and page 10 the DEP questions how the pipeline will impact private wells in the area and what testing Sunoco should conduct. As stated in the Thornbury Township letter to the DEP dated May 25, 2018, the 450 foot area defined by Sunoco is arbitrary and it excludes most of the residents of Tanguy Homesteads, the community that borders Andover. With the exception of one resident, all homes in Tanguy Homesteads use private well water. We are also located at a lower elevation than the drilling site. I am not a geologist and it is fairly obvious that liquid flows downhill. The letter from Thornbury Township questions how Sunoco plans to handle contamination from the HDD as well as contamination resulting from additional holes that may reach well water supplies. I request that the recommendations of impartial geologists, not Sunoco, define how many private wells are impacted by the proposed HDD and other pipeline activities.
- Insist on the Geophysical Survey requested on page 15 and page 16. The test borings that Sunoco is relying on are too far apart and too shallow to provide enough information.

Generally, Sunoco's response is "business as usual" – spend the least amount of money, do the least amount of work to install a potentially deadly pipeline in a highly

populated area. Until Sunoco demonstrates a commitment to the safety and health of Pennsylvania residents, I urge you to revoke Sunoco's drilling permits. (10)  
Letter – [Trish Mangan](#)

#### **10. Comment**

Pursuant to the Corrected Stipulated Order entered at Environmental Hearing Board Docket No. 2017-009-L on August 10, 2017 (“Order”), we forward the attached comments of Thornbury Township, Delaware County on Sunoco Pipeline L.P.’s (“Sunoco”) re-evaluation report for the horizontal directional drilling proposed under “DEP Permit HDD Reference # PA-CH-0421.0000-RD.” (“Arch Bishop / South Chester Road Crossing” in Westtown Township, Chester County and Thornbury Township, Delaware County).

The Andover Homeowners’ Association, Inc. (the “Association”) requests that Thornbury Township’s comments be made publicly available. The Association also requests that the Department of Environmental Protection respond in writing to each specific issue raised by Thornbury Township. (11)

Letter – [Andover Homeowners’ Association](#)

Letter – [Catania Engineering Associates, Inc.](#)

#### **11. Comment**

Regarding Mr. Rocco’s February 22, 2018 DEP letter and Sunoco’s May 22 reply, please hold Sunoco accountable to respond in detail. Per the numbered comments in the aforementioned letters:

1. Professionals should sign and seal the report, or at least certify their applicable sections and any further information provided as a result of DEP follow-up.
2. Wells more than 450 feet from the drilling could be affected. Professional certification that they will not would help explain this delineation.
3. What is the long-term solution to impacted water supplies?
5. a. Sunoco’s not providing the requested analysis, but instead talking about why it isn’t necessary, or relevant, and then going on to talk about how they will provide water in the event of a problem, raises more red flags.
5. e. If DEP wants the tests, Sunoco cannot deflect by saying that they require additional requests from each homeowner.
7. DEP request for bedrock geology information shouldn’t be delayed until a meeting, when it may still be unacceptable to DEP for permitting the work.
8. Multiple IR’s, repeated failed drilling and steering problems at nearby Slitting Mill Road raise concerns of heightened risks at this site.

10. b. does not represent a complete water level survey being used, especially since it says “if known”. Knowing more, before Shoen Road drilling for example, could have prevented ruined wells and aquifers.

12. and 13. Taking corrective action only after IR, pressure loss or possible contamination is a plan that could be improved upon, by being proactive to prevent such events.

14. a. Location of 926 site close to existing pipelines and utilities could create more risk.

16. and 18. Sunoco needs to provide a geophysical survey, as requested repeatedly by DEP.

The history of water supply impacts, groundwater flowback and inadvertent returns, and similar pipelines’ accidents in less densely populated areas, coupled with the lack of scientific study and reassurance, support worry about wells / water and safety alarm.

Thank you for demanding more information about this proposal, (12)

## **12. Comment**

This latest HDD re-evaluation report is unacceptable and should not have been posted for public comment. Once again Sunoco has failed to respond to many explicit, material requirements from the Department of Environmental Protection that should be pre-requisites. It is inexplicable to me that this far along they have yet to be provided.

Just to name a few DEP should continue to demand:

- A licensed, professional geologist to sign and seal parts of the report which apply to geology. Given the criticality of the geology this should be fundamental.
- An actual analysis of private water supply well production zones and how the proposed HDD activities will interact with them versus the two pages of obfuscation Sunoco provided thus far.
- Sunoco should provide water quantity tests for private wells, even if the well-owners didn’t request that test.

Sunoco’s proposed HDD between Routes 3 & 926 along Route 352 is ill-conceived and reckless. This is far longer than most other drills on the project, in a densely populated area where many residents rely on private wells for their most basic right, clean water.

We don’t have to speculate on what risks this presents. We don’t even have to go as far away as West Whiteland where Sunoco has already contaminated private wells

and is now seeking a major plan modification because of the risk HDD poses for public water wells.

We can just look at Sunoco's actual results in Thornbury Township in the fall of 2017. The Thornbury Township Engineer documented on-going failures of the intercept drilling there over the course of several weeks. Then for three weeks in Nov 2017 a new pilot hole was attempted and ended with the drill coming out 10 feet from the targeted exit point. Amazingly, Sunoco's own report states "steering within the Baltimore Gneiss has been problematic....These minerals and rocks can divert the drill bit from the intended alignment." But they want approval to proceed anyway?

Sunoco acknowledges the near certainty that they will adversely affect private wells and is preemptively recommending that well-owners make arrangements for alternate water supplies. Yet they admit they have been unable to contact and/of finalize arrangements with all identified well-owners. Have they even identified all well-owners?

Further failed intercept drills are likely to cause more inadvertent returns (IRs). There were 6 IRs for the 1350 ft HDD in Thornbury in 2017. How many more can we anticipate with the proposed 6346 HDD with the same geology but going downhill?

Sunoco is also doing a poor job at controlling dust and runoff at the drill site at the intersection of Routes 352 and 926. This is especially serious because that site is a former apple orchard and the soil is known to be contaminated. I have made several calls to the Delaware County Conservation District and DEP to report problems.

There are many problems with this HDD plan and with the re-evaluation report. It is also highly problematic that Sunoco can take as much time as they need and the Public has only 5 days to comment that coincides with a holiday weekend.

Oftentimes there are bad outcome even when you have taken every possible precaution. This is not the case here. We have had too many bad outcomes already and Sunoco's own report confirms future harms. If Sunoco is allowed to proceed we should expect more of what we have seen so far.

I urge the DEP to continue to protect our community and deny approval of this plan.  
(13)

### **13. Comment**

Pursuant to the Corrected Stipulated Order entered at Environmental Hearing Board Docket No. 2017-009-L on August 10, 2017 ("Order"), please accept these comments on Sunoco Pipeline L.P.'s ("Sunoco") re-evaluation report ("Report") for the horizontal directional drilling ("HDD") proposed under "DEP Permit HDD Reference # PA-CH-0421.0000-RD." ("Arch Bishop / South Chester Road Crossing" in Westtown Township, Chester County and Thornbury Township, Delaware County).

## **The Standard for the Department's Review**

Pennsylvanians rely on the Department of Environmental Protection (DEP) to protect them from hazardous industrial activities that threaten their air, water, land and physical safety. The Department has recognized (through approximately 53 separate Notices of Violation, two separate settlement agreements including monetary penalties, and a temporary permit suspension that alleged an unwillingness or inability on Sunoco's part to comply with state law and permit conditions) that Sunoco's construction of its proposed Mariner East 2 hazardous, highly volatile liquids export pipeline has already done enormous damage to the public, and to private property such as that of the Association.

DEP's role is to review and assess Sunoco's Response dated May 22, 2018, and to decide what action to take on it. This review must take place in accordance with the applicable statutory requirements, including those found in 25 Pa. Code Chapters 102 and 105. In considering whether to permit further construction to take place, it is DEP's responsibility to review and assess the Report with the primary goal of protecting the public, not to advance Sunoco's interests. The key is to look at the individual circumstances at the site in question. Critically important is accounting for input from those directly impacted by the proposed project, who have a deeper connection with and greater knowledge of the land and the area than the foreign corporation proposing to construct hazardous liquids transmission pipelines through it.

A meaningful, objective and substantive review and assessment by the DEP must ensure that any new or continued construction operations at the re-evaluated sites will cause minimal, if any, risk to the public safety and the environment. Anything less than a full, careful, and objective review will endanger the public and the environment. Pennsylvanians place their trust in the Department to do a thorough, science-based assessment, taking into account these and other comments, and accepting Sunoco's Response only if it protects the public safety and the environment from further harm.

In particular, DEP should respond to each point raised herein. Soliciting public comment but than failing to respond to apposite, jurisdictional comments received amounts to a betrayal of the public trust. Accordingly, the Association requests a specific response from the DEP to each of the following comments.

### **Comments on DEP Permit HDD Reference # PA-CH-0421.0000-RD**

As an initial matter, the Association observes that Sunoco's Response dated May 22, 2018 references only Westtown Township (Chester County) and "Edgemont" (sic: Edgmont) Township (Delaware County). In fact, the HDD operation purportedly addressed by Sunoco's response is proposed to take place in Westtown Township and Thornbury Township, Delaware County (and not in Edgmont Township at all). The fact that Sunoco is unable to even correctly identify or spell the name of the

municipality in which it proposes to operate is alarming. At a bare minimum, DEP should closely review the entire Response for other gross errors (or errors directly caused by Sunoco's inability to correctly identify the location of the proposed operation), or, under 25 Pa. Code section 105.13(b), return the entire application to Sunoco.

This proposed HDD site stands out as being in one of the most densely populated areas along the entire pipeline route. It is also far longer than most other drills, at nearly 7,000 feet. The number of impacted residents and vulnerable water supplies is thus especially high. The hydrogeologists that Sunoco hired to review plans for the Site have made a number of recommendations geared toward avoiding complications during the construction process and protecting water supplies. Yet Sunoco has not adopted those recommendations, and instead proposes "no significant changes to the HDD plans" besides implementing standard "best management practices." The Report provides no explanation of why Sunoco has ignored its scientists' recommendations. It also appears, as with prior re-evaluation reports, that Sunoco has not provided its scientists with all necessary information regarding well locations and features. Critically, Sunoco has failed again to conduct a meaningful alternatives analysis as required by 25 Pa. Code section 105.13(e)(1)(viii). For these reasons, and as described in more detail below, the present proposal should be denied.

### **Sunoco has not conducted a meaningful alternatives analysis**

Sunoco has never provided a meaningful alternatives analysis as required by 25 Pa. Code section 105.13(e)(1)(viii). Sunoco's brief, generalized discussion of the re-route alternative in its previous response dated January 2, 2018 does not provide nearly enough information about alternative routes to determine whether re-routing is preferable. That response describes a potential route to the southwest as requiring clearing of "new greenfield" and then dismisses that alternative without providing any basis for comparing that route to the planned route. Sunoco's latest response doesn't address the applicable statutory alternative analysis at all. A meaningful alternatives analysis requires quantitative and qualitative details about the potential environmental impacts at each location, as well as the safety of each. 25 Pa. Code section 105.13(e)(1)(iii)(C) and 105.13(e)(1)(vii). Without such analysis, the appropriateness of the proposed route cannot be verified. Without such analysis, Sunoco has simply not complied with the statutory requirements.

In fact, Sunoco's "new greenfield" terminology is misleading at best and factually incorrect at worst. The planned alignment involves the acquisition through eminent domain of a greatly expanded easement across private, preserved, residential property owned by the Association. This expanded easement is next to an existing easement; but because the expanded easement consists of treed, maintained open space, it is in fact "new greenfield" itself. Sunoco's argument that it has chosen the planned alignment for the purpose of avoiding the taking of "new greenfield" fails because it is simply wrong. Sunoco should be required to comply with the statutory

requirements by analyzing alternative routings in meaningful detail, accurately quantifying the specific amount of “new greenfield” in each.

In addition, the Andover residential subdivision contains a historic site registered in the Historic Resource Inventory of Thornbury Township, Delaware County. This site contains two structures built in the 1700s, the foundations of at least four other structures, and a wide field of potential historic or cultural significance which has not been meaningfully evaluated by Sunoco, the Pennsylvania Historic and Museum Commission, or the U.S. Army Corps of Engineers. This site was previously determined to be eligible for listing in the National Register of Historic Places. The Association believes that items of significant historic and archeological significance, and possibly human remains as well, may be contained in the area which Sunoco proposes to disturb as part of the proposed HDD operation. In fact, grubbing activities by Sunoco in the vicinity of its proposed new greenfield easement have brought historical artifacts to the surface. Sunoco was observed not to take the slightest notice or care of these artifacts as it was disturbing them, but they were recovered by the Association and remain available for inspection by a competent authority. Sunoco should be required to discuss alternative routings in meaningful detail, evaluating and quantifying the effects on cultural and historic resources of each alternative. See 25 Pa. Code sections 105.13(e)(1)(ii), 105.14(b)(5), and 105.16(a).[1]

In terms of public safety risks, the planned HDD operation is contemplated to support the construction of two new hazardous, highly volatile liquid transmission pipelines, at open-trench depth, less than 100 feet from residences in a densely populated “high consequence” area. Every one of the 39 residences in Andover is within 800 feet of the proposed route. One expert model predicts blast and thermal impacts from a large release of highly volatile liquids could extend to 1,800 feet from the point of release.[2] Another expert model predicts “life-threatening effects or death” from heavier-than-air gas at 2,400 feet, and a “lower explosive limit” of flammable or explosive gas[3] extending to 3,900 feet from the point of release.[4] Corroborating these models, a 2015 accident involving a release of ethane, with ignition, from a 20-inch diameter new pipeline, resulted in thermal damage at 2,000 feet from the point of rupture. And Sunoco has reported more leaks from its pipelines than any other operator tracked by the federal government, at least 301 of them since 2006 alone. Many of these accidents have occurred in Pennsylvania, including a 2015 leak of hazardous liquids in Edgmont Township; a 2016 rupture which released a reported 55,000 gallons of gasoline near Williamsport (Sunoco’s fourth leak on that particular pipeline segment[5]) and a 2017 leak of hazardous, highly volatile liquids in Morgantown. Highlighting the trend of Sunoco pipeline accidents, in 2016 Sunoco reported leaking a greater quantity of hazardous liquids from its pipelines than in the previous six years (2010-2015) combined.

Sunoco has provided no credible plan to protect vulnerable, dense, immobile populations from a release of highly volatile liquids. On December 6, 2017, in New Mexico, a pipeline accident involving methane (a less dangerous material than highly volatile liquids) prompted the Eddy County Office of Emergency Management to

advise, via Twitter at approximately 2:00 a.m., that residents should “self-evacuate” a four-mile diameter circle.[6] That’s about 12.5 square miles, or the land area of a typical Pennsylvania municipality. In the case of heavier-than-air, extremely flammable highly volatile liquids, such self-evacuation must be carried out in the correct upwind direction and on foot—vehicles cannot safely be used. Such a scenario is certain to cause difficulties (to say the least) for seniors and families with children, especially at night or during inclement weather.

In the event of a large, unignited combustible vapor cloud, immediate self-evacuation is the only possible means of protection of life. Yet Sunoco has not established or identified any credible system by which residents would be warned of the need to begin a rapid self-evacuation, nor by which they could actually carry out such self-evacuation, particularly at night or in inclement weather.[7] This is an especially acute shortcoming in the area of Sunoco’s proposed highly volatile liquids pipelines for seniors and families with children. See the Proclamations and Resolutions of Concern from various townships and school districts (including Westtown and Thornbury) at [www.middletoncoalition.org/copy-of-local-state-governments](http://www.middletoncoalition.org/copy-of-local-state-governments).

Sunoco should be required to discuss alternative routings in meaningful detail, quantifying (at a minimum) the public safety risks of each in specific terms of the area likely to be impacted in a worst-plausible-case release of hazardous, highly volatile liquids; the numbers of people reasonably expected to be in that area at various times of day; and the potential self-evacuation routes and obstacles to self-evacuation of each alternative.

## **Conclusion**

For these reasons, the Andover Homeowners’ Association, Inc. requests that this proposal be denied. (11)

Letter – [Andover Homeowners’ Association, Inc.](#)

## **14. Comment**

The following comments are in regard to Sunoco’s response dated May 22, 2018 regarding the proposed “Arch Bishop / South Chester Road” HDD Operation, PA DEP Section 105 Permit No. E15-862 PA-CH-0421.0000-RD & PA-CH-0421.0000-RD-16 (Sunoco HDD No. S3-0541)

On January 11, 2018, the federal Pipeline and Hazardous Materials Safety Administration (PHMSA) issued Sunoco a Notice of Probable Violation and Proposed Compliance Order alleging violations of construction requirements on Mariner East 2. It was issued after “a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA)...inspected Sunoco’s Mariner East 2 (ME2) pipeline project.” The Notice of Probable Violation states:

“During the inspection, the PHMSA inspector observed pipe being installed in a trench near...near Hopedale, Ohio. Just east of the pipeline installation, pipe

segments were strung out in a linear fashion in the pipeline right of way. Upon inspecting the pipe that was strung out, the PHMSA inspector observed numerous coating scrapes on at least 5 segments of pipe. Several segments of pipe had severe coating damage, and at least one joint of pipe had a gouge that extended into the wall of the pipe.”

In essence, it appears the PHMSA inspector discovered Sunoco in the process of burying damaged ME2 pipe sections.

This is a serious concern, given Sunoco’s industry leading number of pipeline accidents, at least 301 of which have occurred since 2006, many in Delaware and Chester Counties, the site of Sunoco's HDD and additional pipeline construction.

The last time Sunoco received a Notice of Probable Violation for pipeline construction irregularities, it was in April 2016 and involved the so-called Permian Express II (PEX II) pipeline in Texas. In that Notice of Probable Violation, PHMSA alleged that Sunoco used unqualified welders and unqualified welding procedures to make more than 3,000 welds on PEX II. "Upon discovery of these errant practices, Sunoco attempted to qualify the welders by re-testing them after-the-fact. While this is not consistent with the requirements of [14 CFR] Part 195, it is even more problematic that some of these welders who had already made production welds on the PEX II pipeline failed to pass the re-test, and in some cases failed multiple qualification attempts."

The risk involved was obvious, but Sunoco put PEX II into service anyway—upon which it promptly failed "in the vicinity of a girth weld." And Sunoco failed to promptly detect that an accident was underway. Sunoco had initial indications of a problem on PEX II on or about August 30, 2016; but it failed to determine the pipeline had ruptured for eleven long days. Finally, on September 10, 2016, Sunoco shut down PEX II. Sunoco received additional federal enforcement action for the PEX II rupture. Sunoco initially reported that PEX II had leaked 800 barrels (33,600 gallons) of hazardous liquids, a figure it later revised by an order of magnitude to 8,600 barrels (361,200 gallons).

Sunoco’s inability to detect leaks has been demonstrated repeatedly and recently. Sunoco also failed to detect its leak of hazardous, highly volatile liquids in Morgantown, which a landowner reported on April 1, 2017. And Sunoco has had at least three leaks in Edgmont Township in recent memory, none of which was detected by the operator. The most recent of these was reported by a landowner who lives along Valley Road on April 10, 2015. The available evidence indicates this Sunoco pipeline had probably been leaking for years.

Sunoco also has a history of failing to make required reports to both the federal and state governments. For example, on April 6, 2017, Sunoco received this federal Notice of Probable Violation and Proposed Compliance Order. The document states "SUNOCO failed to submit a written DOT Form 7000-1 for an accident that occurred

on August 12, 2016, at its Terminal facility in Nederland, Texas. The accident involved a release of crude oil, ignition of the crude oil, and injuries requiring in-patient hospitalization." In fact, at least seven people were injured in this accident.

The underlying accident (which Sunoco failed to report) was the subject of a separate enforcement action in which the federal government alleged violations of fifteen separate areas of federal safety regulations ranging from construction practices, to procedures manuals, to drug and alcohol testing. The government notes that two of these fifteen areas are repeat violations, and proposed a civil penalty of \$1,539,800.

This same pattern has been displayed at the state level: Sunoco has repeatedly been issued Notices of Violation by the Pennsylvania Department of Environmental Protection that include failure to make reports required by state law, permit conditions, or both. The pattern is clear: Sunoco has accidents, fails to report them, receives enforcement action, and then continues to fail to make required reports.

This pattern continues. On May 3, 2018, DEP again cited Sunoco for frac-outs near the Tunbridge Apartments in Delaware County, a site of repeated enforcement action. This Notice of Violation (approximately the 53rd DEP Notice of Violation since ME2 construction began) notes that Sunoco failed (on four separate occasions covered by the NOV) to properly report the events.

Sunoco proposes to transport industrial quantities of extremely dangerous materials through the heart of dense, vulnerable population centers in Chester and Delaware Counties. It has provided no credible plan to protect the public, resulting in a recent shut down of operations by the Pennsylvania Public Utility Commission. And Sunoco's pattern of behavior is indicative of a high-risk operation (in terms of consequences and probability of a serious accident). Accordingly, I urge the DEP to deny Sunoco's request HDD operation in Thornbury Township, Delaware County and Westtown Township, Chester County. (14)

## **15. Comment**

On May 22, 2018, Sunoco submitted a letter to the Department in response to the Department's February 22, 2018 request for additional information regarding horizontal directional drilling ("HDD") Site PA-CH-0421.0000-RD ("Site"). 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"), we respectfully submit these comments in reply. Our comments mirror point by point (for most points) the requests and responses from the Department and Sunoco.

### **Point 2 (150-foot "impact area")**

Sunoco claims that its "previous statement concerning the potential effects within 150 ft is now moot" due to the Consent Order & Agreement. This is both incorrect and troubling because Sunoco is failing to provide documentation to confirm questionable

statements it has made to the Department, and is failing to conduct an actual hydrogeological analysis of the Site, as required by the Order. Sunoco's statement is incorrect because the provision of a temporary water supply does nothing to protect the private water supplies. It may stave off harm to landowners' health during the course of the drilling, but still leave them with damaged or destroyed water supplies. Further, damage to a well affects the value and livability of the home, no matter the temporary band-aid provided.

There is no sound hydrogeological basis for claiming that water supplies are only at risk within 150 feet of the HDD alignment. But because it was convenient here, Sunoco made that representation to the Department. Having been called on its misrepresentation, Sunoco wants to brush it aside rather than own up to the fact that it made statements to the Department for which there is no justification. Appellants believe it is important for the integrity of the administrative process that the Department not let Sunoco get away with submitting falsehoods to the Department as truths.

As importantly, Sunoco needs to have done a scientifically valid hydrogeological evaluation of the Site. Sunoco withdrawing its very specific conclusion related to the critical issue of which wells might be impacted raises serious questions about the validity of its other scientific and hydrogeologic conclusions. The Order is not moot regardless of the Consent Order and Agreement. The Order requires scientific analysis including "analysis of well production zones." These analyses need to be accurate and scientifically defensible. As it stands, neither the Department nor the public has any way of knowing how many wells may be impacted. Indeed, wells outside of even the 450-foot buffer in which Sunoco asserts it will provide replacement water could be at risk.

### **Point 3 (agreements for replacement water)**

Replacement water has not yet been arranged for all residents whose water may be impacted by construction at the Site. Sunoco has indicated that it will initiate further contact with certain residents. Until that process is complete and the documentation of the agreements has been submitted to the Department, the plans for this site should not be approved.

### **Point 4 (changes to water quantity)**

Sunoco writes:

both the Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan ('IR Plan') and the Operations Plan require SPLP to offer alternative water supplies to landowners with water supply wells within 450 ft of the drill profile. Obviously, to the extent a landowner accepts this offer, their water supply should not be adversely affected during HDD activities.

This is not obvious—in fact, it is not at all the case. Water well contamination and impairment is not a temporary matter that always resolves, leaving the supply owners free to start using their water supply good as new. The Department should reject the false presumption that offering a temporary water supply is a solution to property damage to third parties.

It should be stressed that Sunoco took most of the land for its pipeline from landowners under the threat of condemnation using eminent domain, or the actual use of eminent domain. These are third parties many of whom do not want this company tearing up their land to build these pipelines. The inability to use their own water supplies due to a Texas company's forceful entry onto their property is an extreme circumstance. When Sunoco writes, "The best means to protect water well quality or quantity during the HDD is non-use," Sunoco is attempting to normalize the theft of a third-party's property rights—their ability to use their water supplies—for the purposes of Sunoco's profits.

The best means to protect a water supply is to not violate the rights of the third parties in the first instance.

**Point 5a (analysis of well production zones)**

Sunoco has still not provided the analysis of well production zones requested by the Department and ordered by the Environmental Hearing Board. Its response amounts to generalities and offers little insight into strategies for protecting wells near the Site. Nevertheless, Sunoco claims: "Potential subsurface geologic characteristics will be used to predict possible communication pathways between the HDD and water wells in the area." That must be done now, as part of the planning the process and prior to any Department approval.

**Point 5d (water quality sample results)**

The water quality results provided by Sunoco are merely a summary and fail to demonstrate compliance with the requirements of the Water Supply Plan. The table provided does not even include dates to show when testing took place. Full lab reports must be provided to the residents and the Department and it is not clear this has happened. The summary also indicates that a number of wells were not analyzed for E. coli, total coliform, and fecal coliform. The Water Supply Plan explicitly requires testing for such pathogens. Sunoco cannot rely on the incomplete tests it has summarized and landowners should be made aware that they are entitled to not only whatever testing Sunoco may have completed, but specifically testing for these bacteria. Bacterial contamination has been of particular concern for residents in the pipelines' path and for good reason; there is no question that it poses a risk to health. No plans can be approved for this site until the required testing is completed for all locations.

### **Point 5e (water quantity testing)**

Sunoco asserts it has offered residents water quantity testing and none have accepted the offer. It is unclear when or how those offers were made. Construction incidents continue to unfold and residents who did not request water quantity testing months ago may have more reason now to be interested in additional testing. As Sunoco is purportedly continuing its outreach efforts after having “not re-approached outstanding well owners recently,” it should also renew its efforts to offer water quantity testing.

### **Point 7 (additional examination of bedrock geology)**

Sunoco has dismissed the Department’s request for additional examination of bedrock by claiming extensive coring would be needed. This ignores the possibility of using surface geophysical methods which have provided helpful information at previous sites and could provide helpful information here. While Sunoco points to additional analysis it has conducted, it is unclear what exactly the scope and nature of that analysis was. Sunoco says that analysis “will be provided prior to the NTP meeting.” Any such analysis needs to be made available to the Department and the public now, as part of the re-evaluation process, and incorporated into plans. It defeats the purpose of the re-evaluation process to withhold information and for study results to not be reflected in construction design.

### **Point 8 (difficulty steering)**

Sunoco’s response ignores the fact that its professional geologists have previously made specific recommendations regarding steering:

The only practical solutions for optimizing progress and staying on alignment may be to govern drilling rates and continue to use greater than typical alignment checks to maintain alignment. In addition, consideration should be given to lowering bit pressures, as well as mud pressures... Diamond bits may be beneficial for maintaining the cutting surface and steering through hard rock zones.

Not only has Sunoco refused to follow these recommendations, it altered and resubmitted the geologists’ report to delete this language. Sunoco should be required to specifically address why it is not following these recommendations, and that explanation should be supported by analysis from a professional geologist.

### **Point 9 (overburden)**

Sunoco claims overburden characteristics “have little value to an HDD design or analysis.” This is inaccurate and troubling. Overburden characteristics can contribute to inadvertent returns and sinkholes, regardless of whether construction is located in karst. A significant part of the re-evaluation process is to understand and inform the public about the risks associated with Sunoco’s plans. Even if Sunoco does not find

data on overburden characteristics helpful because it intends to ignore that data in its planning anyway, that does not negate the need for that information to be provided to the Department and the public so the plans and associated risks can be fully assessed.

### **Point 15 (Terracon Report)**

As a report which is an integral part of the report is not yet in final form, the Department does not yet have the full set of information on which to base a decision to approve the start of this HDD. The Department should review the Terracon Report in final form when it is available before making a decision.

### **Points 16 and 18 (geophysical surveying)**

The Department has reasonably pointed out the significant distance between profile-depth test bores at the Site and requested geophysical surveying to interpolate between the data points. Sunoco's response to Point 16, which focuses on the risks associated with drilling additional geotechnical test bores, evades entirely the question of additional geophysical surveys. As Sunoco is well aware, geophysical surveying—what the Department has directed for the Site—includes surface geophysical methods such as electrical resistivity, gravity, and seismic. These methods do not pose the risk of creating additional preferential pathways.

Furthermore, despite Sunoco's vague anecdotes about the usefulness, or lack thereof, of the data it has gathered from previous geophysical surveys, it is well understood that geophysical surveying methods can be used to gather relevant data regarding both overburden and bedrock, and in karst and non-karst terrain. Geophysical surveying is also not limited to the subsurface depths Sunoco suggests and can be performed to the profile depth of the Site. As described above, even if Sunoco intends to ignore the results of geophysical surveying in its planning, overburden characteristics, for example, can provide important information about the likelihood of inadvertent returns and compaction or subsidence.

Unfortunately, Sunoco cannot be trusted to determine when geophysical surveying is appropriate. Sunoco tries to argue geophysical surveying would not provide usable data for this Site, but in reality, Sunoco has been loath to conduct geophysical surveying regardless of its usefulness. It claims to have conducted a suite of geophysical surveying at nine locations. It is unclear which locations or surveys it is referring to; to the best of Appellants' knowledge, geophysical data for nine separate locations has never been made available to the public or incorporated into plans. Perhaps with the exception of the surveys conducted around one of Sunoco's surface facilities, every geophysical study Appellants have been made aware of was performed only after Sunoco was ordered to do so, in response to serious incidents, or once a public water supplier had to step in. Geophysical studies are a powerful tool for preventing incidents but Sunoco has failed to accept this reality.

One of the most galling examples, as the Department is well familiar, occurred in nearby West Whiteland Township. Sunoco did not perform geophysical surveys until after large sinkholes opened up in backyards and exposed Sunoco's existing pipeline. Even then, the geophysical surveying was conducted as part of an emergency order of the Public Utility Commission ("PUC") and over a very limited survey area. Those surveys revealed further problems in the geology at that location, forcing Sunoco to abandon its plans for drilling there. Amazingly, even in the face of the clear evidence that its drilling caused the sinkholes, at a recent hearing before the PUC, Sunoco then blamed the Department for the mess Sunoco caused. The presiding judge saw through their scapegoating: "I am not persuaded by the testimony of Sunoco's witness Demko, who testified the sink holes near Lisa Drive were caused by inactivity of drills caused by a DEP injunction, then resumed HDD activity or that the subsidence was unrelated to the karst or other geological formations at Lisa Drive." See PUC Interim Emergency Order of May 21, 2018, attached hereto as Exhibit 1. Thus, not only can Sunoco not be trusted to conduct geophysical where necessary, it cannot be trusted to honestly represent the results of such surveys without careful oversight.

The Department should continue pushing for the geophysical surveys it has required and should also ensure results are made public. Only then, and after it has been confirmed that Sunoco's plans are safe in light of the survey results, would it be appropriate to consider approving them. Cutting corners only serves to endanger the public and our natural resources. As the Honorable Judge Elizabeth Barnes of the PUC aptly wrote just days ago in a decision that shut down ME2 construction in West Whiteland Township and ordered additional geophysical surveying, "Sunoco has made deliberate managerial decisions to proceed in what appears to be a rushed manner in an apparent prioritization of profit over the best engineering practices available in our time that might best ensure public safety." Id. The public is relying on the Department not to let Sunoco's desire to rush forward with construction override their safety by approving the current plans for this Site.

Thank you for considering these comments. Please keep us apprised of your next steps on this HDD Site. (15-19)

Letter – [Clean Air Council 5-27-18 – Arch Bishop / South Chester Road Crossing](#)  
Attachment – [PUC Interim Emergency Order of Mar 21, 2018](#)

## **16. Comment**

I am distressed and appalled at Sunoco's blatantly negligent responses to DEP's requests regarding the harmful impacts HDD has on the environment.

On page 1 in Sunoco's response, Sunoco refuses to adhere to DEP's request to have a licensed Professional Geologist sign and seal off on the parts that pertain to geology.

On page 6, HDD is likely to damage wells as it has in Whiteland Township, contaminating the water supply of residents. Sunoco's own limited data on water levels between Routes 3 and 926 indicate the ground water level in that area is higher than the HDD drill sites at either end of the HDD run, thereby causing ground water to seek a lower exit point.

All the requests in the DEP document are of monumental importance to the well being of residents along the route of the pipeline. Sunoco's responses indicate an unwillingness to comply to DEP's requests; I implore the DEP to insist on compliance to all requests or revoke Sunoco's drilling permits. (20)

### **17. Comment**

As residents of Thornbury Twp, specifically Andover Development, we are very concerned about the ongoing construction and potential issues regarding the proposed drilling methods Sunoco is planning along South Chester Road. It is apparent that Sunoco has not done their due diligence with regard to the placement of these pipelines. The contamination of well water along the proposed routes, the sink holes, and the inadvertent returns are some examples of problems that continue to plague this ill-conceived project. Of grave concern is the lack of any sort of safety or evacuation plan to warn residents of a potential catastrophic event that would occur if leaked gases find an ignition source. ME1, ME2 & ME2X in the Andover Development are within 100ft. of many homes. This is unacceptable. Sunoco's safety record is one of the worst in the industry--and it is apparent that Sunoco and its affiliates have no respect for the lives and well-being of the people and neighborhoods it continues to ravage.

We know the DEP has requested detailed information from Sunoco regarding specifics about many issues such as well depths and water levels, geophysical studies, casings and monitoring and identifying potential drilling hazards for the Arch Bishop/South Chester Road Crossing. Please hold Sunoco to task with regard to these important details.

Simultaneously, a complete and meaningful discussion of the public safety risks of this project should be of highest concern especially considering that the contents are such highly volatile liquids and if leaked, would be an odorless, combustible vapor cloud of gases. That we should "self-evacuate" is not a reasonable solution.

Please take back the permits and hold Sunoco responsible to the very highest standards of accountability with all aspects of this pipeline. (21)

Letter – [Christopher and Denise McCarthy](#)