

**DEP Permit # E23-524**  
**DEP Permit HDD Reference # PA-DE-0104.0008-WX**  
**DEP HDD # S3-0631**  
**Township – Aston & Middletown**  
**County – Delaware**  
**HDD Site Name – Chester Creek (Gun Club) Crossing**

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

<b>Commentator ID #</b>	<b>Name and Address</b>	<b>Affiliation</b>
1	Melissa Haines	
2	Kyle McKnight	
3	Sharon Pennington Vonbergen 82 Mildred Lane Aston, PA 19014	
4	Jill Daly	
5	Ruth Lerario	
6	Carol Carmon	
7	Stephanie Venable Aston, PA	
8	Kristen Mongan Aston	
9	Amanda Scott, CIH, CSP, HEM, CMLSO 3401 Civic Center Blvd. Philadelphia, PA 19104	Director, Environmental Health and Safety and Occupational Health Departments
10	Christina Johnson 815 Adams Drive Brookhaven, Pa	
11	Charles Leslie	
12	Agnes Wozniak Delaware County	
13	Linda J. Delgott 4501 School Lane Brookhaven, PA 19015	
14	Heather McLachlan Adams Drive Brookhaven	
15	Dustin Gladfelter	
16	Mary Hegeler Middletown resident	
17	Jeanne Unangst Brookhaven, PA	
18	Steven A. Williams	

	280 Bridgewater road Brookhaven, PA 19015	
19	Nicholas Harris 4936 Jackson Drive Brookhaven, PA 19015	
20	Patricia Cofield	
21	Diane Tate	
22	JoAnn Williams 108 Judith La Middletown Twp, PA 19063	
23	Karen Hatzell	
24	Melissa Marshall, Esq. P.O. Box 408 1414-B Indian Creek Valley Road Melcroft, PA 15462	Mountain Watershed Association
25	Aaron J. Stemplewicz, Esq. 925 Canal Street 7 <sup>th</sup> Floor, Suite 3701 Bristol, PA 19007	Delaware Riverkeeper Network
26	Joseph Otis Minott, Esq. 135 South 19 <sup>th</sup> Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
27	Alexander G. Bomstein, Esq. 135 South 19 <sup>th</sup> Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
28	Kathryn L. Urbanowicz, Esq. 135 South 19 <sup>th</sup> Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
29	Leanna Krueger – Braneky P.O. Box 202161 Harrisburg, PA 17120	Pennsylvania Representative

**1. Comment**

I oppose the submitted HDD plan for S3-0631. We have already been down this road with previous HDD of this site resulting in numerous frac outs which Sunoco/ETP did not adequately contain. Have we learned nothing? Their promises to be good neighbors have repeatedly gone unfulfilled. I urge the DEP to deny this request to drill again in this area and stop allowing this company to pollute our waterways. (1)

**2. Comment**

Please, please, please put a stop to the damaging of our towns. The places where most of us grew up and still live and our forced to watch as greed ruins the woods/fields we once played in. Give Sunoco the boot already. (2)

### **3. Comment**

I am writing this letter in protest of the above pipeline - I am not willing to go through more expense and inconvenience due to this pipeline - I had to repair the foundation of my home and replace countless items that "vibrated off of walls and shelves". Not to mention the loss of enjoying the use of the home I pay to live in due to their "round the clock work" constant beeping and construction noise. I am terrified that a pipe will fail and my life will be put in danger. I am nervous that I will be able to retain my home's value when I go to sell it. Recently everyone in my area received a mailing and a certified package "questioning whether we needed to have our water tested" - this shows me the lack of concern from these people installing the new pipeline. Don't you think they should have known in advance if there was a possibility of a homeowner's water source being compromised? What about the people at Elwyn? in the case of an emergency will these people be trapped and injured? There are so many elements of "not acceptable" in the case of a new pipeline being installed. Please help the very people that vote for you to hold your office and make sure the pipeline people are doing the right things! (3)

### **4. Comment**

I do not support anything with Sunoco and their pipelines. They are a physical danger to residents and destroyed their financial investment in their home values. I'd love to move but can't because my property value dropped drastically with the pipeline. Having a disabled child the location of this drilling scares me to death. You are taking advantage of those that are the weakest.

Elwyn clients trapped. The location of the southeast drill site needs to be changed. It is on Judy Way in Aston, adjacent to an Elwyn "sheltered workshop" where dozens of adults with cognitive & physical limitations go every day. Last year's Citizens' Risk Assessment showed that the point where HDDs enter the ground is exceptionally dangerous, because underground leaks are likely to emerge there.

In the case of the Judy Way drill site, it gets even worse: a fire at that site would block the only road into or out of the Elwyn facility, leaving no evacuation route and no way for emergency responders to get in and assist those threatened by the fire.

Sunoco needs to shift the location of the drill site by a few hundred feet in one direction or the other to remove this threat to our most vulnerable residents. This plan could cause more frac-outs in Chester Creek and the surrounding neighborhoods. It could endanger our most vulnerable residents. Minor changes to the plan could help to prevent these outcomes. Hope those changes are met. (4)

### **5. Comment**

As a local resident, I am very concerned about the drilling plan for the second pipeline tunnel of Chester Creek crossing near the Delaware County Gun Club/Field & Stream Association through Judy Way in Aston, and alongside the Brookhaven Swim Club. The following are my chief concerns:

This project follows the same route as the previously-installed 16-inch pipeline. Because frac-outs happened here before, they are likely to happen again. The route should be altered to avoid this likely scenario.

The location of the drill site at the southeastern end of this stretch is problematic because it is next to the Elwyn sheltered workshop on Judy Way. If a leak and fire happened there, it would block the only route in or out and trap the Elwyn clients. The drill site should be moved. Please address these safety issues before construction begins. (5)

**6. Comment**

It is horrifying to think that we are expanding these dangerous/environmentally toxic pipeline operations in an area so densely populated with fragile communities like Elwyn and the Riddle Village nursing home.

I have no idea how the folks setting up and executing this plan sleep at night, or the elected officials who approved this.

I can't believe that anyone with common sense thinks this pipeline is a good idea. (6)

**7. Comment**

ID number for this section of the pipeline: S3-0631

This plan has problems. The previous HDD, in 2017, resulted in a series of frac-outs (the first ones experienced in this part of Pennsylvania), and there is good reason to believe that they will happen again unless the route is altered. Also, the location of the drill site at the southeastern end is itself a problem. Sunoco should be required to evaluate the options for a somewhat different underground path for its HDD. It is required by its settlement with the PUC to consider alternative routes, but in its proposal document, it does not. The company simply refers back to the route analysis it did when it originally proposed this pipeline.

- This project follows the same route as the previously-installed 16-inch pipeline. Because frac-outs happened here before, they are likely to happen again. The route should be altered to avoid this.
- The location of the drill site at the southeastern end of this stretch is problematic because it is next to the Elwyn sheltered workshop on Judy Way. If a leak and fire happened there, it would block the only route in or out and trap the Elwyn clients. The drill site should be moved. (7)

**8. Comment**

Please stop Sunoco from drilling more in my area. The ID number for this section of the pipeline is S3-0631. They are accident prone. There are no safety or evacuation measures in place. There are elderly, wheelchair bound seniors and residents with disabilities here. This is our home. We cannot pick up and move. Yet we are being endangered and left with no recourse. This needs to be shut down. Please help us. (8)

### **9. Comment**

As an Aston Township resident and Environmental Health and Safety professional, I strongly do not support the plans for a second Mariner East pipeline tunnel to be run at Judy Way. There have been too many safety accidents and near-misses to continue to increase the risk to our community. (9)

### **10. Comment**

My name is Christina Johnson, I live at 815 Adams Drive, Brookhaven, Pa. I am writing to urge DEP to require Sunoco to re-evaluate their current plans to HDD drill under Chester Creek (pipeline section S3-0631). As I'm sure the DEP is aware, Sunoco caused many frac-outs into Chester Creek beginning in May of 2017. This frac-out caused quite an unacceptable mess to enter Chester Creek. DEP was never given the exact contents of the drilling fluid, so we will never know exactly what or how much was spilled into our waterway. For weeks, Sunoco left their half-hazard, poorly made sandbag and plastic fencing creations in our creek. There was a total of about 5 circular sandbag creations placed in the middle of a rising creek. The sandbag structures did not hold (as residents predicted) and the drilling fluid continued to spill into the creek and creek bed. I question the exact amount of drilling fluid released into Chester Creek, as Sunoco is responsible for reporting their own frac-outs. Generators were running 24 hours, trying to keep up with the mess that Sunoco created. As a result, a generator (owned by Sunoco) leaked diesel fuel onto the creek bed. This incident was one of many that continued to go unreported by the pipeline owners. The need for Pumping trucks, vacuum trucks, 24 hour pump workers, generators, noise pollution, air pollution and water pollution, all can be avoided. This area has suffered enough. Residents had to replace sidewalks due to the drilling fluid entering through their lawns and paved properties. The chances of repeated frac-outs are high, due to the drill following the same route. How much more stress can this roadway take? The fact that cement had to be poured into the drill hole in order to rectify the leaking drilling fluid issue should be reason enough for Sunoco to choose a different route for their pipe. The permits were issued before these frac-outs occurred, therefore, they are no longer applicable. If we were building a new home, and the foundation suddenly changed, the plan would need to be re-evaluated, it's a logical step. DEP needs to hold all parties involved accountable, you can be certain that the residents will do the same. Thank you for your consideration in this matter. I've included several pictures for documentation. (10)

Attachments – [Christina Johnson](#)

### **11. Comment**

Start soon as possible, get it underway, now. Don't hesitate or delay it. Nothing but positive things can come this work to be done (11)

### **12. Comment**

I am writing in opposition to Sunoco's plans for an additional Mariner pipeline section, cutting through sensitive areas such as Elwyn, Chester Creek, and Linvilla Orchards.

Sunoco has repeatedly shown total disregard for the health and safety of the communities in which it has been installing the Mariner pipeline.

They have caused numerous sinkhole problems, released drilling fluids into the environment. Even more concerning, their plan to dig near Elwyn could result into blocked access to the school should there be a pipeline explosion/failure.

I urge you to stop Sunoco from ruining our community and endangering us. (12)

### **13. Comment**

In regards to the planned second tunnel to run a Mariner East pipeline from Judy Way in Aston, Pa to Delaware County Field and Stream Gun Club in Brookhaven which is referred to as S3-0631, I strongly disapprove.

Throughout the project Sunoco Logistics has proven to be a severe risk and an irresponsible contractor. They have repeatedly endangered the communities in which they worked. Please do not approve any additional work on any additional pipelines until Sunoco Logistics can prove, without a doubt, that the processes they use to tunnel are 100% safe for the environment. Also, any work performed by Sunoco Logistics must be covered 100% against any pollution or disruption of the environment.

Sunoco Logistics has proven to be a destructive neighbor who has abused their license to work in Pennsylvania. Please protect our homes, our environment, our water, our air, our communities. (13)

### **14. Comment**

As a Brookhaven homeowner in a neighborhood adjacent to Chester Creek, I remember very well the drilling fluid spills that occurred there two years ago. This is how I first discovered that my family and home were being put at risk by a project developed strictly for profit, rather than having any sort of public benefit.

As I continued to follow the events surrounding the construction of this pipeline ever since, I have been disgusted and alarmed that the damage and destruction of beautiful natural spaces which surround our town and many others has been allowed to happen for this purpose. In particular, I find it unacceptable that Brookhaven borough residents are subjected to these safety risks along with neighboring towns who \*did\* sell their easements, without having any notice or say in the matter. Our council was not consulted or even notified; we as residents had no opportunity to hear arguments or decide if this project is one we wanted to allow in our neighborhood. The impact and involvement on and of our Borough is clear and evidenced by the previous drilling spills; due to the fact that drilling will cross under the creek into Brookhaven through both Aston and Middletown and the construction must be approached in part from Brookhaven territory.

Also, consider this: our children attend middle and high school in Aston in close proximity to this pipeline, over which our buses are routed as well. Our children play at Linvilla Orchards and recreate at the Swim Club, both within a couple of hundred feet from this pipeline. Does this not give us a right to question the safety and environmental impact of this project; and to demand a halt to construction as this has not been the case from the very beginning?

Having witnessed the contamination of water supplies and many sinkholes which have occurred along the pipeline route in nearby townships throughout the construction phase, Brookhaven residents refuse to be put at risk for similar impact or have our natural spaces further damaged, because of easements \*others\* have sold. Again, as there is no public benefit to this particular pipeline, not even, from what I understand, tax revenue to be had. It is incomprehensible how this project even had approval to go forward in the first place. It is time to take a closer look and hold Sunoco/ETP responsible to act in the best interest not of all parties, but first and foremost, of the public.

As the DEP, despite requests, never independently tested the spills or the Creek water to determine if there was any diesel or other contaminants, we have no knowledge of the extent of the damage caused by the prior drilling spills in Brookhaven possibly even in other towns, as well. Nor do we know what \*actual\* contaminates or harm may occur from this proposed new drilling plan. Simply taking Sunoco's word for it is unacceptable, yet if things go forward, that is what is being done.

Our government agencies are responsible for protecting our public and our lands- not making it easier for corporations to profit. I implore you to do the job you are assigned to do, follow proper guidelines, and NOT allow drilling under Chester Creek within Brookhaven territory again at this time. Failure to do so will undoubtedly result in more damage, as well as further a very questionable and risky project which, as more and more information comes to light and more and more damage occurs, reveals itself to be absolutely not in the public's best interest. (14)

## **15. Comment**

Frac-out risk. Given that the proposed route for the 20-inch HDD is essentially the same as that for the previous 16-inch one, except a bit deeper, we can probably expect frac-outs in similar locations.

When the 16-inch pilot hole was drilled, there were frac-outs right in Chester Creek, as well as in the yards of nearby homes. These occurred near the spot where a sewer line crosses the creek, and they were blamed on two factors that weakened the rock at that location. One is a geological fracture zone there, and the other is fracturing created by blasting when the sewer line was put in. These same factors could easily lead to frac-outs this time around.

Alternative route for HDD? Sunoco should be required to evaluate the options for a somewhat different underground path for its HDD. It is required by its settlement with the PUC to consider alternative routes, but in its proposal document, it does not.

The company simply refers back to the route analysis it did when it originally proposed this pipeline.

But that analysis was done prior to the frac-outs that plagued the 16-inch drilling process. No analysis of alternatives has been done that takes the history of frac-outs into account. Sunoco must be required to do that now. Can a route be identified that crosses under the creek in a location that it not a known fracture zone? Wouldn't that be a better alternative to try?

In its proposal, Sunoco argues that routes outside its existing easements (which it refers to as "greenfield" routes) would be environmentally harmful. That could be the case for surface trenching and boring operations, but HDD is used precisely because it generally does not affect the ground surface. It is true that Sunoco would have to secure new easements if the underground route of the HDD is changed, but the DEP should insist that the company at least explores such an alternative and explains why its current plan is better.

View looking north from the Judy Way drill site. (Base image from Google.) Elwyn clients trapped. The location of the southeast drill site needs to be changed, but for a different reason. It is on Judy Way in Aston, adjacent to an Elwyn "sheltered workshop" where dozens of adults with mental limitations go every day. Last years Citizens' Risk Assessment showed us that the point where HDDs enter the ground is exceptionally dangerous, because underground leaks are likely to emerge there.

In the case of the Judy Way drill site, it gets even worse: a fire at that site would block the only road into or out of the Elwyn facility, leaving no evacuation route and no way for emergency responders to get in and assist those threatened by the fire. Sunoco needs to shift the location of the drill site by a few hundred feet in one direction or the other to remove this threat to our most vulnerable residents (15)

#### **16. Comment**

I object to Sunoco drilling through more densely populated neighborhoods and putting citizens and property at high risk with the large NGL pipeline. Frac outs and limitations for escape routes in case of a leak and emergency are good cause to require Sunoco to investigate alternate routes and to explain why this one is best.

This for-profit \*non-public-utility\* pipeline is a danger to our community and should be shut down or routed far from homes and families. (16)

#### **17. Comment**

I just learned that Sunoco Logistics had filed a plan to drill a second tunnel to run a Mariner East pipeline from Aston to Brookhaven, this whole project has been a complete nightmare and a great hazzard to the residents. I beg you to stop this project! Sunoco has no concerns of the risk they are putting people's lives in, the fact the pipleline is feet from houses, schools, shopping centers, churches that will have

highly explosive liquid going through them is just beyond comprehensible. Please stop this mess! (17)

### **18. Comment**

I very concern about the pipeline that is considered to be installed at Judy Way to the Delaware county Field and Stream located on Bridgewater road and Creek Rd.

This pipe line could do damage to home values in the area and serious safety concerns of possible leaks and explosions. There have been low earth quakes tremors in the last several years. I live in the Trimble Run condo off of Brookhaven road and we have been exposed to two major leaks from the pipe line in Marcus hook.

The sad thing is we had to leave the entire area because of asthma problems and two off us broke out of a rash from the leaks. Our child physician office said the rash was probably from the two leaks I been told that a truck driver broke a valve backing up his truck in Marcus hook and caused a major leak. Our State Rep even detected the odor in the area. The first leak you could even detect the leak all the way up to Glen Mills, Pa.

There should be some type of emergency call system installed to notify residents of any leaks in the area of the entire pipe line. Many children suffer from asthma and other health problems. We could detect the odors coming from the two leaks through the walls even when the windows were closed and locked.

Please keep our neighborhood safe and our health. We should not have to leave our homes because of mistakes being made especially if its true a truck drive broke the valve on his truck not paying attention backing up his truck full of this gas coming from the pipe line and exposing all of us to these gases.

Please consider installing an emergency phone system for our area in case a major leak would happen in the middle of the night while people are sleeping especially with people who have serious health problems and please do not allow them to install the addition to the pipeline. (18)

### **19. Comment**

Hello and good afternoon. My name is Nicholas Harris and I am a resident in Brookhaven PA and reside approximately 900 ft from the proposed routing of the second pipeline. I think it's necessary that I not only voice my concerns to you, but also advocate for my 4 year old son who resides with me. I've browsed through the reanalysis report provided by Sunoco Pipelines and have a few initial concerns right from the get-go.

My first concern is that the analysis did not consider any form of risk analysis associated with drilling within proximity of an existing pipeline. From the provided information, it appears that both pipelines follow similar trajectories and come within feet of one another. My main question is what type of affect does drilling for the

second pipe have on the first? Can shifting bedrock or grout injection stress the existing pipeline? Is there a possibility of drill head drifting into the existing pipeline, understanding that operator error is a real thing. Will the first pipe be operational during the drilling? This was never discussed.

My second concern is the regions susceptibility to fracture traces, many of which are within close proximity to my house. I don't feel that Sunoco has provided me with sufficient evidence that these fracture traces will not be affected during drilling. I have city water, so I don't have to be concerned with well water infiltration. I do however live on a steep hill with large retaining walls in my backyard. Sunoco has provided no information regarding risks associated with my property specifically. What recourse do I have if I begin to notice shifting within my retaining walls? I feel that the burden of proof and it's associated costs have been unfairly placed on me if something were to happen.

I'm not advocating for a complete rerouting of the pipeline, although, this too should have been provided within the reanalysis report. I'm simply asking for someone to voice my concerns and get me the answers I'm looking for and demand that appropriate steps are taken to mitigate all risks associated with routing a pipeline through residential neighborhoods and to ensure that all constituents are satisfied with Sunoco's due diligence to ensure that safety is priority over profit. And I don't have that feeling after reading their reanalysis and I hope my concerns at least provoke you to question this a little further. I feel that we are taking Sunoco Pipelines at their word which has proven to be questionable at best. So please be my voice and ensure that all proper steps have been taken to ensure our safety and satisfaction with the project. (19)

## **20. Comment**

The Energy Transfer pipeline construction has impacted my family in many ways, but the most significant safety concern is at Elwyn's OTC in Aston.

Most critically, the pipeline is within yards of the Elwyn occupational training center where my son, who has Down syndrome, works on Judy Way in Aston Township. The center, which serves individuals with various disabilities including those in wheelchairs, had to be evacuated twice last year because the pipeline workers damaged Elwyn's sewer lines. First, Sun Co. denied their role in the damage to Elwyn's sewer line. The second time, only after calling State Rep. Krueger's office, did the DEP come out and investigate and it was clear that Sun Co. (Energy Transfer) workers had damaged Elwyn's sewer line. They were cited and fined. The press reported on this and Sun's PR folks continued to lie when contacted by the press about the issue. The evacuation made it evident how difficult it would be to save these individuals if there were to be a leak or accident at this site. They cannot be evacuated quickly. There is absolutely NO safety or evacuation plan in place in the event of a pipeline accident. The workers at Elwyn are very vulnerable and should not be subjected to this kind of risk right outside their door.

Our clients enjoy going out on the patio for break and/or lunch and during construction are subjected to the proximity of strangers, construction dust, noise, truck and equipment traffic. This has been going on for 2 years!

They are not using double containment pipes that would minimize the impact of a leak, there is no warning system and no safety plan in place.

Once Sun got the rights to this property, they steamrolled over Aston Township, Delaware County, Elwyn and their families. (20)

**21. Comment**

I am writing to voice my objection to the proposed Sunoco pipeline though Judy Road. I did not think it is fair to the current residents and I oppose it. Please do not allow this change to take place. (21)

**22. Comment**

In 2017, the last HDD pipeline attempt had many frack- outs in Chester Creek in the Middletown Twp Delco and Aston, Brookhaven area and contamination occurred. This new route could also be a deathtrap for Elwyn workers with no way to escape. It needs to be moved. Why do they continue to destroy our communities when clean energy jobs in solar are increasing at a terrific rate? We do not deserve this. (22)

**23. Comment**

I am outraged that Sunoco plans to drill a second tunnel on the Judy Way property beside the Bridgewater Elwyn Workshop. My mentally disabled son attends the workshop there. I fear for his safety. Frac outs have happened before. Judy Way, being the only access to Bridgewater workshop, is a big concern. How would the clients get out in case of a disaster? I strongly support the need for a moratorium on the project. (23)

**24. 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-DE-0104.0008-WX (the “HDD Site”).

**1. Sunoco has not provided an adequate plan for avoiding and mitigating geologic risks.**

At least six inadvertent returns occurred during the installation of the 16-inch pipe at this site. In addition, Sunoco experienced a massive loss or circulation incident, never recovering 10,000 gallons of drilling fluid it lost underground. The IRs resulted in discharges into nearby storm drains and streams and containment efforts required

structures that reached the brink of impeding stream flow. The geophysical surveys Sunoco commissioned confirmed several zones along the path of the proposed 20-inch line will make the new plans vulnerable to IRs, despite the redesign. Specifically, the surveys suggested that fractures and low velocity zones could continue deep into bedrock, where they could be intercepted by the new profile.

The Hydrogeologic Report acknowledges these risks, noting in particular:

- Seven fracture traces that cross the alignment, two of which intersect in the vicinity of the May 2017 IRs.
- Low-velocity bedrock zones identified by the geophysical survey performed by Tetra Tech.
- A relatively thick saprolite and weathered bedrock zone (up to 45 feet deep) that can be overcome by drilling fluid pressures where overburden is thinning near the entry/exit points.

In order to address these risks, the Hydrogeologic Report concludes: “The drilling plan should address these potential areas of LOC and IR risk by specifying the best management practices that will be utilized to control drilling fluid pressures in each potential situation.” (emphasis added.) Sunoco has failed to heed this recommendation. The best management practices it describes in its summary are the same best management practices it has listed time and again in other reevaluations. They are not site-specific, and certainly do not provide a plan for each problem zone that has been identified along the path of the present redesign. The Department should require Sunoco to heed the advice of its own hydrogeologists. Sunoco must provide a plan for addressing each anomalous zone.

In addition, given the continued risk of IRs, Sunoco should develop and implement an enhanced monitoring plan for the surrounding area so if IRs do occur, they can be identified and addressed as quickly as possible.

## **2. Sunoco has not addressed risks to and associated with nearby sanitary sewer lines.**

Sunoco asserts that the root cause of the IRs that occurred during the installation of the 16- inch pipe was fracturing in the bedrock, which may be attributable in part to the previous blasting and excavation that was conducted to install nearby sewer lines. Though Sunoco acknowledges the presence of sewer lines and expects their installation has had impacts on the permeability of the surrounding geology, it does not bother to assess the impacts Sunoco’s further disruption of the Site will have or has had on the sewer lines.

Based on resident reports, it appears Sunoco may have struck a sewer line during the installation of the 20-inch line in the vicinity of Judy Way. Sunoco does not describe any such incident in the Report, but it does describe Sunoco’s contractor monitoring the installation of a new sewer line in October 2017. The installation of the new sewer line corresponds with a lengthy, unexplained gap in Sunoco’s installation

timeline. The Report describes HDD at the Site starting in March 2017 and encountering a series of problems over the next few months. The borehole was then grouted on June 17, 2017 and allowed to cure for two days, with drilling resuming June 19, 2017. The next data point on Sunoco's construction timeline for the Site is pipeline pullback on March 18, 2018, 272 days later. Appellants are aware of two orders that halted drilling during that period: The Order cited above, which halted drilling July 25-August 10, 2017 (16 days); and the Department's suspension of permits that was in effect from January 3- February 8, 2018 (36 days). It is unclear what was happening for the other 220 days of construction and why the process took so long, especially since the Report does not describe any incidents happening between June 2017 and the March 2018 pullback. Especially given the timing of the sewer line's installation, it is important that the Department inquire as to any incidents related to the sewer lines and any relationship between Sunoco's construction at the Site and the installation of a new sewer line.

Regardless of whether Sunoco in some way impacted a sewer line during the installation of the 16-inch line, Sunoco still needs to ensure that its installation of the next pipeline will not pose a threat to the sewer lines. Sunoco has provided no discussion on this point and should be required to do so.

**3. Sunoco has not provided an explanation for why it installed the 16-inch line in the alignment originally planned for the 20-inch line.**

According to the Hydrological Report, "It should be noted that the 16-inch line was installed along the originally planned alignment for the 20-inch line (S3-0631)." Sunoco never bothers to address this noteworthy point. Why was the 16-inch line installed in the alignment that had been planned for the 20-inch pipe? Whatever the reason for Sunoco's change of course, it needs to explain how the redesign accounts any factors that triggered the change. The Report presently gives no reason to trust that Sunoco's failed attempt to install the 20-inch line at the Site will be any different this time around. Curiously, the Hydrogeological Report also notes that "[t]he changeover for all active drilling locations in Spread 6, from the 20-inch line to the 16-inch line, was on November 1, 2017" (emphasis added). This is the first reference Appellants have encountered regarding a whole-cloth switch of pipeline installation order in Spread 6. While Appellants recognize that this change may not be related to the geology or other site conditions, that cannot be ruled out without Sunoco providing an explanation.

**4. The Report lacks basic information and analysis regarding water supplies.**

Sunoco has identified two private water supplies within close proximity to the proposed drilling alignment. It has offered no plan for protecting these water supplies or analysis of the well production zones that supply them. This is a recurring problem with Sunoco's recent reevaluation reports, which the Department has responded to by pressing for more information. The Department should require Sunoco to provide additional information regarding water supplies here as well, including details

regarding water testing requests and results, an analysis of the well production zones, a plan for protecting these water supplies, and a commitment to conduct testing in association with the installation of the 20-inch pipe.

Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site. (24-28)

Letter – [Clean Air Council – 6-20-19 – Chester Creek \(Gun Club\) Crossing](#)

## **25. Comment**

As state representative for the 161st Legislative District in Delaware County, I must write to express my opposition to Sunoco Logistics' plan to drill a tunnel for a second 20-inch pipeline running beneath Chester Creek, as I believe it puts both our water quality and our residents in undue danger.

This is not baseless speculation. This is not even a general complaint against the practice of horizontal directional drilling through residential neighborhoods. This is a call to acknowledge the precedent of failure in the Mariner East 2 pipeline's construction activities in this very same area. This is a call for the DEP to learn from past mistakes and to protect the private property of our citizens.

On May 3, 2017, HOD for a 16-inch pipe in this same location led to multiple inadvertent returns that impacted water quality and private property. At the time, I had no idea what an inadvertent return was when I received calls from panicked residents in Brookhaven. They saw brown water shooting up from the ground in their front yards and had no idea what was happening in their neighborhood because Sunoco Logistics never applied for permits to drill in Brookhaven, only in Aston. Local elected officials were in the dark as well because there were no permit applications for Brookhaven. I visited the site on Mother's Day with my five-year-old-son and we saw a residential neighborhood that looked like the site of a natural disaster. There was brown material actively visible in the creek, front yards were barricaded with sandbags, and the barrier material that Sunoco installed to attempt to contain the drilling fluid had broken loose and was hanging on branches all over the creek. It took weeks for them to clean it up. This accident led to the very first notice of violation that Sunoco Logistics received in the construction of the Mariner East 2 project.

On July 6, 2018, there was another construction accident a few miles down the road on Judy Way in Aston. This time, a contractor hired by Sunoco Logistics was working a few hundred feet from a facility run by Elywn that serves individuals with significant disabilities. The contractor hit a sewage line and raw sewage backed up into the parking lot, leading to the emergency evacuation of people in wheelchairs. This accident also led to a notice of violation because Elwyn's sewage lateral was damaged by the contractor. Sunoco Logistics was fined for this incident, in part, because Sunoco never reported the incident. DEP only learned about the accident after my office called to share what we heard from impacted families.

Therefore, I must oppose the planned drilling beneath Chester Creek. These sites are not conducive to HOD and the neighbors have already faced significant hardship as a result of this project. Delaware County has already been impacted by 13 accidents that received notices of violation since construction on the Mariner East 2 pipeline began. We've suffered enough. I urge the DEP to reject this application. (25) Letter - [Representative Leanne Krueger-Braneky – 6-20-19 – Chester Creek \(Gun Club\) Crossing](#)