

**DEP Permit # E23-524**  
**DEP Permit HDD Reference # PA-DE-0032.0000-RD**  
**DEP HDD # S3-0580**  
**Township – Edgmont**  
**County - Delaware**  
**HDD Site Name – Gradyville Road Crossing**

**1st Public Comment Period**

<b>Commentator ID #</b>	<b>Name and Address</b>	<b>Affiliation</b>
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29	Charles and Karen Katz 1487 Heather Hills Lane Glen Mills, PA 19342	

## 1. Comment

Hi. There has to be an alternative solution. The risk to humans either injury or worst death is too great. Please continue with the geotechnical analysis and save our trees, creeks, and land from this "FlexBor" technology. The route cannot go through a highly populated area. (1)

## 2. Comment

We are in receipt of the HDD Evaluation report for HDD No S3-0580 and HDD S3-580-16/PA-DE-0032.0000-RD and PA-DE-0032.0000-RD-16.

We do indeed have a private well within 450 feet of the HDD site on Valley Road in Edgmont Township. Based on news reports and Sunoco's track record, I now live in overwhelming fear of ME2 and ME1 and am concerned for the safety of my family, neighbors and everyone else in the Blast Zone. In addition to worrying about potentially toxic and explosive leaks, once the pipelines are up and running, I anticipate that Sunoco will be ruining our aquifer when the HDD begins. I find nothing in this report that indicates preventative measures and lessons learned that are enacted to prevent these wells from being exposed to harm and upset from all the errors that have occurred to date from the full length of the Mariner East2 Pipeline Project. Other than being notified, I do not see any changes reflected in design or approach. Perhaps it is contained within the complex language that anyone who is not a practicing hydrogeologist would not understand.

According to the report, our tap water will be contaminated by petroleum hydrocarbon residue and bentonite clay. In addition, Sunoco's drilling may completely disrupt our water supply. We cannot survive without water as our well is our only source. We have no access to public water and it would take at least a year before approval and construction is complete with full access to public water in this area.

I've been contacted by Percheron about installing a temporary water supply. I find that an unacceptable risky proposal both on a permit/installation and maintenance basis. To date the specific details of this proposal have not been provided. These include but are not limited to, install, contractors, township permits, contingency for natural disasters or maintenance failures, electricity consumption, equipment damage and property wear and tear.

I would like to register my frustration at this whole process. It has felt rushed, murky, and not in the best interests of the residents of the state from day 1. If that is not going to change, then why is it dragging out? These many stops and starts are not indicative of a well-designed or communicated endeavor.

Yes, I live in a blast zone as do many millions more residents who I am confident share my dismay. My water supply and the safety of my family, home, friends and neighbors and community at large are under duress. We are tired of this and having it crammed into our community and risking our safety and well-being.

Please advise-when will this end? (2)

### **3. Comment**

We are in receipt of the HDD Reevaluation report (the "Report") for HDD No S3-0580 and HDD S3-0580-16/PA-DE-0032.0000-RD and PA-DE-0032.0000-RD-16.

We have a private well within 200 feet of the HDD site on Valley Road in Edgmont Township. Based on news reports and Sunoco's track record, we now live in fear of ME2 and ME1 and are concerned for the safety of our family, neighbors and

everyone else in the blast zone . In addition to worrying about potentially toxic and explosive leaks once the pipelines are up and running, we are concerned that Sunoco will be ruining our aquifer with their HDD.

Sunoco's drilling may disrupt our water supply. We cannot survive without water as our well is our only source. We have no access to public water. We've been contacted by Percheron about installing a temporary water supply. To date the specific details of this proposal have not been provided, including details regarding installation, contractors, township permits, contingency for natural disasters or maintenance failures, electricity consumption, equipment damage and property wear and tear.

In connection with the Report, we have the following specific questions that we would like answers to:

1. The Report states that the excess produced groundwater, or groundwater produced during non-drilling periods, will be captured, filtered, and discharged to the land surface at the edge of the temporary workspace. What impact will such discharge have on the property at the edge of the temporary workspace?
2. The Report states that portable storage tanks will be immediately available if the filtration system fails to clean the produced water sufficiently for discharge. Who decides if the water is filtrated sufficiently for discharge? What procedures are in place to ensure that the water is tested in real-time?
3. The Report states that landowners with private water supplies located within 450 feet of the occurrence of any surfacing of groundwater will be notified of such surfacing and that their water supply may be impacted. How would such landowners' water supply be impacted by the surfacing? What steps will be taken to confirm if such water supply is impacted? If our water supply is impacted, what steps will be taken to rectify the situation and at whose cost?
4. The Report states that if excessive water is generated during the HDD, all wells within a 450-ft radius of the HDD would be monitored periodically to evaluate changes in the water table. If the water table is impacted, what steps will be taken to rectify the situation, and at whose cost?
5. The Report states that if evidence or readings suggest significant petroleum concentrations, drilling will be suspended until samples can be analyzed. If such samples show there is a significant petroleum concentration, what steps will be taken to rectify the situation?

We would like to register our frustration at this whole process. Our water supply and the safety of our family, home, friends and neighbors and community at large are at risk. We are tired of this and having it crammed into our community and risking our safety and wellbeing. Thank you. (3)

**4. Comment**

My comment is to ignore these special interests who are impeding progress. The project is safe, continue on. (4)

**5. Comment**

I write you today with many concerns of the Sunoco Pipeline ravishing our communities and great state of PA. I beg and plead that you and your office perform the due diligence to ensure the safety of all residents of this great state and stand up to the money and bullying of big business. We are at a crossroads where people are losing their property to sink holes without Sunoco notifying the proper agencies. There are rules and regulations for reasons to protect our community, the people and the environment so that generations can continue to flourish on this great state. Government agencies are supposed to enforce these rules and protect their constituents please help and perform your civic duty and do what is right.

Sunoco continues to lack the proper transparency with this project and continues to bully land owners and do it their way not necessarily the proper way. With changes to their plans in the Exton area we need to reassess and not allow them to make quick changes because they continue to fall behind schedule. Haphazard mistakes and cutting corners could be completely destructive for all along this pipeline path. Has the due diligence been done and presented to your organization to ensure this project has completely analyzed the risks of this Mariner 1 and Mariner 2? With the recently exposed pipe in the latest sink holes on Lisa Drive I do not believe that all the proper analysis with geologist and risk assessments (including risk to humans injuries or toxicity levels, lasting and irreversible destruction of Is your agency and the government of PA willing to have this as their lasting legacy allowing a big business to reap profits on the back of PA citizens? We do not need another three Mile Island legacy or possibly worse. All the potential consequences need to be reviewed before decisions can be made has this been done truthfully and honest with Sunoco and PA?

With the various changes in Sunoco's plans we can not allow quick changes with the type of drilling without assessing what damage that can do to the specific location of Exton plus now with all the sink hole issues there and the various types of geology there needs to be a reassessment before they can proceed with all of the proper notification to the state agencies and public. Why is this route the best when we now have sink holes along the existing lines? Are the not familiar with the karst landscape that is prominent in this area? Not only is this endangering neighborhoods but also the Amtrak train line needs to be evaluated as their track record hasn't been stellar the last few years so you need to ensure the safety of this project.

Lastly, we must use other pipeline experiences throughout the years to ensure we do not have history repeat itself with devastation to human life, property, environment. We need to live here, raise our children and not worry about lasting effects! Sunoco just comes in and destroys and has no problem leaving behind the mess they made for

this is not their home we are a write off of a project the plan to make billions exporting the product. We see no benefit only assume the entire RISK.

It is pertinent that the DEP takes the following actions:

- Hold Sunoco to notifying residents within the proper parameters and ensure not more aquifers and wells are destroyed
- More testing needs to be required to ensure the Geophysical landscape will sustain this type of drilling and interruption over a long period of time. One sinkhole is enough and the continuing occurrence should be very concerning to your agency.
- The current route needs to be substantiated that the risk to densely populated areas and various environmental impacts. Why aren't other routes analyzed?
- Hold Sunoco accountable for all actions. Prompt notification of issues if not fines or disruption of the project. This project should be done based on the state standards not Sunoco.
- Lastly, has this project been properly vetted for the safety of the voters and residents of PA? Has the due diligence met the proper analysis to ensure the safety?

Thank you for your time regarding this very important matter. It is time that the DEP protects the people and environment that your agency stands for. Sometimes a more difficult path must be traveled to actually do the right thing to protect some of our greatest treasures. Please realize there is a tide that more people and agencies are now aware of the violations Sunoco have already committed with complete disregard for regulations no project should be rushed through due to campaign promises and dirty campaign money. The time is now to do the proper view of this project and ensure it meets all the expectations of those parties involved. We the people of PA deserve that at a minimum. Elections are approaching and enough is enough. (5)

## **6. Comment**

Good afternoon. I would like to share with you the issues that we had over the Summer and Fall of 2017. Please note, I am not asking for any money, I just would like you to know how this drilling is affecting MY neighborhood.

Our house is only 6 years old. It was well constructed and has been properly maintained. Other than normal maintenance we have not had any major issues with our home until this summer. Over the Summer/Fall of 2017 we have had to replace the following things in our home:

Replace the hot water heater

Replace the pump in basement that pumps the toilet up and out

Replace the hoses in both washers and a dryer

Replace all the shower heads in Master Suite  
Replace the complete water filtration system  
Replace the sediment filter on the hot water tank 2 times (It was just replaced at the end of June and was not due to be replaced again until December)

The replacements were due to excessive amount of sedimentation in all of the above. We had Powell Well come out and review the Well to make sure that it was working and they said it was fine. We have not had any sediment issues prior to this summer. They suggested we contact someone associated with the pipeline.

The plumber who installed the new water filtration system that was completed destroyed with sedimentation suggested that I contact the pipeline.

All of the above items have been used and serviced on a regular basis.

If that was not enough, one day last October, we acquired a new resident – a RAT. We brought in an exterminator and he spent hours going over the house and could not figure out how it came in BUT discovered that there were numerous rat burrows located in our back yard. Also something we never had before this summer. He suggested we contact someone associated with the pipeline.

Our foundation is a foot thick and there were no access points for the rodent to enter the house. Our assumption is that when the new water filtration system was being installed and the door was left propped open for a period of time that the RAT took up residence inside our home. He chose to make his appearance when we had company but quickly hid in the basement. Because of the size of the house, we were not able to pinpoint Its exact location. Our exterminator has set multiple traps and we are still hoping to find it dead or alive.

He treated the multiple burrows with rat poison. Spring is fast approaching and I am hoping not to go outside to a back yard full of dead rats. I am also hoping that no others can enter our house.

RATS? How did we ever acquire that? Did they come in on your giant trucks? Is it from all the digging? Did they end up in my yard because I am the only person in the neighborhood that does

Not have pets or farm animals? It was so big that it failed to get under a door and it used its claws to try to open it leaving scratch marks across the bottom of the door.

I took the advice of the well people, the plumber and the exterminator and contacted the Township. They told me to send in a letter and that they would forward it on. That letter was sent on 10/17/17. To date, no one from the pipeline has responded to me. Thank you – I appreciate that.

Facts:

We have currently spent close to \$10,000 in repairs – and that is just the plumbing alone.

I made several attempts to bring this matter to someone's attention.

Our neighbors closer to the pipeline have had their wells tested.

Shouldn't we have had ours tested as well, or would that skew your results?

I have not had any of these issues with my home prior to last summer.

I cannot believe that there was not a common cause for these events.

I can't imagine any other event other than blasting/drilling/etc. that would affect our well and cause all of the plumbing to go down at the same time.

I will be happy to discuss this matter with you at any time. (6)

## 7. Comment

This letter is in response to Sunoco re-eval analysis for HDD drilling site Gradyville Road Crossing in Edgmont PA DEP section 105 permit SPLP HDD No. S3-0580 and HDD S3-0580-16. I am in severe opposition to this HDD plan due to the following items:

Number 1: This HDD chosen land site is unsafe for drilling since it is in the same location as the previous petroleum spill that occurred in April 2015 from Sunoco's Mariner East 1 pipeline. It is unimaginable that anyone would consider drilling through soil that continues to have petroleum hydrocarbon residues. Petroleum spill products continue to be found at this very time in one of four Monitoring wells that were installed to monitor the leak contamination. So far, the contamination has appeared to have been contained to the acres of land around the proposed drill site, we are told by Sunoco. To now risk contamination of all local aquifers and well supplies that have somehow escaped this contamination so far is absurd!

Number 2: The previous spill location includes a wetlands area that flows into a stream that links up to Chester creek. Sunoco and this reevaluation report states there is no wetlands in the area. This is incorrect!

Number 3: Sunoco has stated 3 properties are on public water. This is false! All properties are on private water/well systems.

Number 4: This proposed drilling land is located along an upland ridge area and serves as a local groundwater recharge zone, thus placing our wells at increased risk for contamination.

Number 5: At least 26 wells are at same depth as boring, which will increase our chances of drilling fluids and petroleum hydrocarbon residues contamination in our wells.

Number 6: At least 3 linear fractures cross drill path at 275 feet, 1520 feet and 2740 feet increasing our risk of well contamination.

Number 7: There is no option for public water hook up in this area once our wells become contaminated. To remain on alternative water buffalo type water supply systems once our wells become contaminated for a permanent basis is not feasible.

Number 8: Sunoco is recommending residents have “alternative water supply” in place during drilling, which seems as though they are expecting contamination of our wells. We cannot take this risk!

Number 9: Increased risk of damaging Mariner East 1 pipeline during drilling with destabilizing of ground support and around fracture lines that run under ME 1, exposing residents to more petroleum leaks and the really scary thought of mass explosions!

Due to the above facts, open trench or re-routing this pipeline to an area where public water is available appears to be the only safer options. (7)

#### **8. Comment**

Sink holes you idiots! Need I say more! (8)

#### **9. Comment**

I am submitting this public comment because after reading many well written and detailed articles which covered all the technical, environmental, geological and safety reasons why the ME 1 and 2 pipelines should be permanently shutdown, I realized, we can't see the forest for the trees. In our fight to stop this horrible thing, we have tried to convince the DEP, PUC, and Governor Wolf, to help us protect our families and homes. They have completely lost sight of what they are allowing to happen. Their job is to protect us not Sunoco. It's simple, it's not the type of drilling or trenching, ME2 is just wrong!

This pipeline crossing the PA countryside isn't a public utility. It is a mixture of 3 highly volatile gases under high pressure. These gases are odorless, colorless and invisible so when a leak occurs, a warning is unlikely. If there is a significant leak, the gas can ignite into an immense fireball or it will spread quickly until it ignites. If you are within 1000 feet, evacuation is impossible, you will be engulfed by flame. If you are further away, it is recommended you walk upwind away from the pipeline. Everyone within 3 miles of a leak must evacuate on foot. The fire will burn until the pipe is shutdown and the gas burns off. Please take a minute to think about these circumstances.

Why did the PUC allow the pipeline to be classified as a public utility as though it would serve the public good? It is not carrying water or petroleum, it is deadly! This is the first mistake in a long line of mistakes that will result in deaths.

The second error is why did the DEP let Sunoco/ETP build it? Where has the DEP been? How can they ignore the danger to, creeks, land, and private wells.

Sunoco/ETP has a very poor safety record. This isn't a secret. I have read lists of ME2 leaks. Sunoco/ETP has made drilling errors that should have caused the DEP or PUC to shut them down immediately. Some how Sunoco/ETP has everyone believing, the pipeline must go on. Why?

Sunoco/ETP's drilling just created sinkholes which endangered ME1. ME1 is carrying volatile gases at a pressure too high for the old, out dated pipe. This is dangerous not to mention poor judgment! The PUC and DEP can't trust Sunoco/ETP to prevent an accident.

The third error is Governor Wolf's lack of action. Does Governor Wolf think loss of life is a trade off for the few permanent jobs that may result? Is it worth it? Who benefits financially? Just Sunoco benefits, not me or my neighbors.

Our homes and the hundreds and hundreds along the pipeline have now decreased in value. Some estimate a decrease of 50%. I can understand this. Who would buy a house close to the pipeline?

In Delaware county and Chester county PA, many homes, schools, hospitals, 55 and older communities, shopping etc. are well inside the blast zone. One example is Glenwood Elementary School. Parents who moved to Rose Tree Media School District for their children's education are devastated. They can't just sell their home at a loss. Riddle Memorial Hospital is also within the blast zone. It's supposed to be where first responders would take casualties. Even the safety plan doesn't acknowledge the destruction the pipeline would cause. This is just one of the many densely populated areas along the pipeline. It has already destroyed our sense of wellbeing!!

You have to ask yourself, is it worth it? For whom? For what? Who benefits? Ask yourself, "What could I say to a loved one or parent when lives are lost? Can I help stop this? Would I want to live near ME2?"

What is happening to our country? Why should private profit mean more than public good? Why is Sunoco/ETP allowed to take land from a property owner for a private corporation? I repeat, ME2 IS NOT A PUBLIC UTILITY!

The pipeline is a hazard waiting to leak and explode.

Some people think, since it will be buried. It will be fine and everyone will forget about it.

But it's not just carrying water or petroleum, it's deadly. I'll know it's there, I won't forget it. My lovely home is within the blast zone. (9)

## **10. Comment**

We are in receipt of the HDD Evaluation report for HDD No S3-0580 and HDD S3-580-16/PA-DE-0032.0000-RD and PA-DE-0032.0000-RD-16.

I have further reviewed this report with an expert in hydrogeology since my comments on 7 March.

We do indeed have a private well within 450 feet of the HDD site on Valley Road in Edgmont Township. Based on news reports and Sunoco's track record, I now live in overwhelming fear of ME2 and ME1 and am concerned for the safety of my family, neighbors and everyone else in the Blast Zone. In addition to worrying about potentially toxic and explosive leaks, once the pipelines are up and running, I anticipate that Sunoco will be ruining our aquifer when the HDD begins.

According to the report, our tap water will be contaminated by petroleum hydrocarbon residue and bentonite clay. In addition, Sunoco's drilling may completely disrupt our water supply. We cannot survive without water as our well is our only source. We have no access to public water and it would take at least a year before approval and construction is complete with full access to public water in this area.

I've been contacted by Percheron, Sunoco's representatives, about installing a temporary water supply. I find that an unacceptable risky proposal both on a permit/installation and maintenance basis. To date the specific details of this proposal have not been provided. These include but are not limited to, install, contractors, township permits, contingency for natural disasters or maintenance failures, electricity consumption, equipment damage and property wear and tear. Providing water buffaloes is not a solution for ruining people's groundwater.

I would like an answer as to why alternate routes were not considered as required by the August 9, 2017 agreement. In the case of this particular section along Valley Road, the flaws in the proposed route are really outrageous, compared with almost any conceivable alternative. This is a bad route for three important reasons: most of the homes in the area are on Valley Road (so the pipeline will be within a few feet of many of them); similarly, it endangers most of the wells in the area (which are near those homes); and it sends the drill directly through an area where the ground is known to be polluted with the chemical MTBE (see below), thus spreading the pollution throughout the area. Sunoco's existing easement and convenience are not a sufficient reason.

Sunoco must stop spreading MTBE pollution and the 2015 leak at Valley Road and Gradyville Road that introduced the appearance of MTBE in local wells. MTBE is water soluble, so MTBE that is present in a local source can travel through an aquifer and affect other areas. If Sunoco goes ahead with its drilling plan, the drill will pass through the area where the ground is polluted with MTBE. Not only will the passage of the drill spread this pollutant, but the nature of HDD drilling will spread it even

more effectively. In HDD drilling, the drilling mud used as a lubricant is forced under pressure down the drill pipe to the drill bit, and it returns back to the drill along the outside of the drill pipe (unless, of course, it finds another route to the surface, causing a “frac-out”). This circulation of the drilling mud (down to the bit and then back to the drill site) ensures that any pollution in the ground that the drill passes through will be spread all along the drill’s path.

There is, however, an acknowledgement of the incident in the attached report of GES, the geology firm that did the geological analysis of this area. In that report, GES says: “On April 10, 2015, a release of petroleum (diesel, kerosene, and gasoline) was reported west of Valley Road near the Valley Road/Gradyville Road intersection. A pinhole leak was identified in the Sunoco Pipeline Limited Partnership (SPLP) 12-inch-diameter Point Breeze to Montello Pipelines, which was temporarily repaired on April 11, 2015, then permanently repaired in July 2017. It is GES’ understanding that this data has been incorporated as part of the HDD construction preparation and response planning activities.”

If the data has been incorporated in the plan, why is that never stated? And why is the pollutant MTBE never mentioned as a potential problem? What is Sunoco’s plan for dealing with the spread of MTBE and its possible flow into Chester Creek if Sunoco has flow-back problems (as it did in other drill sites)?

Sunoco’s plan makes it clear that wells in the area may well be drained or fouled by the drilling. These wells are open cased at the same depth as the boring, which increases the risk of impact by drilling fluids.” In addition, the highly-fractured rock in the area means that hitting an aquifer with the drill is likely, and that water travels fairly freely throughout the area. So it is likely that a lot of wells will be affected.

According to the geology report, “If significant volumes of drilling fluids were lost, they will tend to migrate along secondary paths of porosity toward groundwater discharge points or residential wells.” In other words, the high-pressure drilling mud will follow any path it can, and some of those paths will lead to people’s wells.

Sunoco must consider the risk of human injury or death. While the DEP’s primary mission is the preservation of the environment, it must also take seriously the risk that this pipeline poses to nearby residents if it becomes operational. A clean environment is essential to human health, and that is certainly critical; but its importance is secondary when human life itself is at stake. The DEP needs to make sure that this pipeline, if it is built, is constructed in a manner and in a location that minimizes its risk to people.

I would like to register my outrage at this whole process. It is not in the best interests of the residents of the state from day 1. These many stops and starts are not indicative of a well-designed or communicated endeavor.

Yes, I live in a blast zone as do many millions more residents who I am confident share my dismay. My water supply and the safety of my family, home, friends and neighbors and community at large are under duress. We are tired of this and having it crammed into our community and risking our safety and well being. (2)

## **11. Comment**

Please, please reconsider your part in how this pipeline will affect the aquifer (likely ruin it), nearby Chester Creek (leach poison into it), and the wells along Valley Road in Gradyville, Edmont Township, PA (poison them with a leaked gasoline additive from another Sunoco spill). We are long-time residents on Valley Road. This pipeline is a nightmare of environmental destruction to the area. That it will carry a very toxic mixture to be shipped overseas to make plastic is an infuriating fact which we have lived with for a while. Not only is our “nest egg” lost to their greed (who will buy a house sitting on this mess), but the water for people in our area, the land impact, and the continual lying by Sunoco has made many of us feel impotent in the face of the power of this corporation.

Now to realize that even the lies Sunoco HAS told us about the safety of the material being pumped, the impact of drilling on our wells, the land destruction, and the “jobs” which it will bring to our County don’t include all the lied they have to sell. They, indeed, know that there is this toxic gasoline additive still in the ground and that it will likely be transferred into our aquifer upon drilling in this area.

All of this logic and these facts have not moved the governor, nor the County. A Department of Environmental Protection could stand in the way of this and be a hero for many reasons. The DEP was created just because we individuals have less status, less political power than you could have. You are the loyal, ever-watchful eyes of the people. The anger and helpless feeling in the face of a large, powerful company leads to political numbness, disengagement, and cynicism. Witness the deadening of fracking areas in our Commonwealth. Please give us hope that our agencies have teeth, have moral backbone against these companies, and can stop the destruction of the land and the poisoning of the water. (10)

## **12. Comment**

I have grave concerns about the pipeline.

My well is 20 feet from the pipeline Horizontal drilling.

My house, built in 1696 of stone, is 10 feet from the pipeline Horizontal drilling.

Sunoco has no easement on my property.

I personally feel that they are working from a perspective of drill first, fix issues maybe later.

Please feel free to contact me to discuss any more detailed issues I have. (11)

### **13. Comment**

My response and set of questions to:

HORIZONTAL DIRECTIONAL DRILL ANALYSIS GRADYVILLE ROAD  
CROSSING PADEP SECTION 105 PERMIT NO.: E23-524 PA-DE-0032.0000-RD  
and PA-DE-0032.0000-RD-16 (SPLP HDD No. S3-0580 and HDD S3-0580-16

Thank you. An understanding of when I can expect a response is appreciated.

- I. Water Levels Impact
- II. Water Contamination and IR
- III. Stress or Exposure of ME1 Pipeline (and risks)
- IV. Terrorist and Natural Disaster Federal Risk Assessments
- IV. Communications

#### I. Water levels impact

- 1) Given the “high risk” nature of the drilling (HORIZONTAL DIRECTIONAL DRILL ANALYSIS GRADYVILLE ROAD CROSSING PADEP SECTION 105 PERMIT NO.: E23-524 PA-DE-0032.0000-RD and PA-DE-0032.0000-RD-16 (SPLP HDD No. S3-0580 and HDD S3-0580-16) in subject digging area affecting residential property wells and bodies of water, what approach will Sunoco employ to monitor wells and water levels in ground based bodies of water during drilling, if a noted change is measured? The CES consultant report notes “medium to high risk” in likely impacts affecting natural flow water along fractures given the unpredictable nature of water movement along these estimated fracture lines as indicated by the CES report. What are the definitions of “high risk, medium risk and low risk”? In a high risk scenario, what methods or approaches are in place to immediately “back out” of drilling should any appropriate indicator (hopefully in place) of mishap is determined?
- 2) According to the CES study, the fracture analysis used to determine possible water flows in the targeted drill zone used Stereo pair images at the 1:20,000-scale recorded by USDA between 1937 and 1942, along with LIDAR images collected in 2008 (PASDA, 2017) to estimate where possible fracture lines might be, with three of the LIDAR derived traces based on this analysis cross the HDD S3-0580 path. Given the assumed fragmented nature of water flow already established in the study, why wasn’t a more extensive fracture analysis completed and (using current data) used to determine the “actual” hydrogeological impact of drilling in this area? The approach used within this report seems crude and inexact (stereo pair pictures from the 1930’s and satellite imagery from 2008). There are many new methods to determine more exact hydrogeological water flow patterns including modeling techniques notwithstanding changes to hydrogeological patterns since the 1930’s.

Why is Sunoco not doing or DEP not demanding a more current and exacting study using rationally available technologies to do a more thorough assessment of the likely

water flow alteration and subsequent impact? There have been massive leaps in technological tools that are not that expensive to employ, yet there is a deficit in taking the needed time to appropriately assess the risk with a greater degree of knowledge to feed into the drill plan.

The approach employed by Sunoco Logistics appears to be “drill and see what happens” which is incredibly irresponsible, particularly when tools to produce a more accurate study are readily available. It is unfathomable that Sunoco Logistics is using technologies to do perform studies from the 1930’s (use of stereo pairs is actually from the 1850’s).

3) What are the metrics by which an “impact” event due to drilling will result in a stop action or otherwise mitigation technique (so as to minimize damages anticipated as noted in the CES study)? Given the fluid nature of the water flows in this area to be drilled (naturally occurring fractures by which water is noted to flow and the highly porous non-cohesive soils and saprolite rock common to this noted area), is there a set of parameters and subsequent technology based sensors employed to monitor and follow in real time during the drilling process that sufficiently monitors the anomalies of a drilling mishap?

Can you share those metrics and your explicit reversal plan(s) for all noted anomalies you intend to measure during drilling (as well as pre and post), such that any potential damage is mitigated to the fullest extent possible? Do you employ thresholds for “ok” vs “at risk” vs “bad” along the scope of elements to be measured? Can you publicly state what these safety measures entail, the approach intended to be used for each metric measure and describe the corresponding action to be taken when such thresholds are reached.

4) Why are natural bodies of (surface) water not being measured for impact related to the digging (ponds and streams)? My property has a 20 X 30 ft. pond (depth approx. 5 ft.+ ) from a naturally occurring spring (likely sourced from one fracture feed given the proximity of a fracture line that crosses the area of my pond according to your lidar based fracture diagrams) of which the earlier drillings drained the pond (direct correlation to digging and drainage not occurred for at least 25 years (no data before that) according to neighbors and in relation to my time the past 10 years at the property) killing wildlife and koi worth 1000’s of dollars each and affecting habitat for an endangered turtle species (I’ve since determined the koi were about 20 years old gifted by a local neighbor to the prior homeowner). The back end of the pond continues into a stream that is one of the initial tributaries of Rocky Run Creek (that leads to the Chesapeake – according to a U S Geological Services water study conducted on my property in 2008). I consider this impact destruction to my property, notwithstanding the “inadvertent” killing of species, and have yet to have any response from Sunoco Logistics other than being informed that the burden of proof is mine to determine (unfortunately the host of critters who died in my dried pond had no say in their demise). For the record, a week post the temporary stoppage of drilling, my pond filled back up with water (but all wildlife in it already dead due

to the 3 months of completely being dry). I fully anticipate the pond will be affected again when Sunoco resumes digging and will be measuring the impact myself but I require a statement as to why this aspect of environmental impact is not considered a problem in the digging of the pipeline.

If you plan on draining my pond again, I will expect you all to get prior authorization from PA Fish & Boat Commission. You have already destroyed the endangered turtle species that has lived in my pond for decades along with the koi fish to which Sunoco has not yet responded.

5) According to the CES Report “It has been verified that 26 properties are located within 450 feet of the HDD S3-0580 ROW with all but 3 properties served by residential wells. These wells are open cased at the same depth as the boring, which increases the risk of impact by drilling fluids”. Why is the impact of drilling only considering properties within 450 Ft of the HDD S3-0580 ROW? Is this a scientifically determined distance of impact (water seems to flow where it wants to, so this 450 ft. consideration seems completely artificial in nature). And to reiterate the prior point, why are surface bodies of water (ponds, streams) not in consideration of the impact and premise for risk? Clean water for wildlife is essential, as it is for human water consumption (Gratefully there is still wildlife in this area that depends on the availability of clean, surface water to live in or drink).

## II. Water Contamination and IR

1) From the CES report: “Given the risk for fluid losses and IRs, a fluid loss mitigation plan (i.e., grouting or sealing) should be developed and implemented during and after construction. The annulus between the installed pipe and borehole wall should be properly sealed upon completion to prevent possible long-term migration of groundwater through the borehole annulus...”

What kinds of grouting or sealing materials as referred to in the plan, are to be used to seal off the “borehole” created by the digging? What is the longevity of the material(s) to be used and can you be explicit in the type of sealant to be used? If the properties of the sealant are high density and non-porous in nature, should we assume that the sealant product likely has plastic or other toxic properties which might contaminate the soil? If the sealant is more porous in nature, should we then assume the sealant will undergo decomposition rapidly and therefore not be an affective sealant? Please explain in detail the materials to be used for the sealant, the chemical composition of such sealant (or any other products to be put in the ground with castoff dispersion impact) the estimated decomposition rate of any such product, the chemical components of the sealant itself and proof of effectiveness and safety in an environment affecting ground water used for human and animal consumption.

2) Recent well tests have indicated that a known carcinogenic M.T.B.E (methyl tertiary butyl ether) residue continues to be found in the soil from the 1990’s Sunoco spill from the Mariner East 1 pipeline (and subsequent leak from April 2015, which

hopefully did not contain MTBE). While you still monitor the contaminated sites with wells (it's not clear how well they are actually monitored but we understand the monitor wells are still there) please explain how you intend to isolate the areas of contamination from further contamination spread through the agitation you are likely to incur while drilling.

Please explain what computer modeling you have done to determine the possible risks of drilling and the impact of opening up fracture lines to such existing harmful chemicals from the ME1 spill that have the potential to further distribute along the fracture lines due to this continued presence of M.T.B.E from your prior ME1 pipeline spill. Please explain what remedial activities will take place to insure the spread of your prior contaminants does not redistribute and leak into drinking water and ponds (affecting humans and wildlife)

3) Why are you potentially using "bentonite plugs" to block a spill? (What kinds of spills)? In vitro studies of the effects of bentonite on a variety of mammalian cell types indicated a high degree of cytotoxicity (cellular toxicity) and genotoxicity (destructive effect on genetic materials within cells). Are these plugs being used to "plug" spills then exposed to the drinking water consumed by well owners? Have you considered the contamination risks at a cellular level to humans and to wildlife by exposing such products to the natural water supply? Are you prepared to address the mutagenic impact on wildlife and/or diseases in humans?

4) What sensor technology do you employ during the digging (and monitoring) process? How are you using the data to accurately capture relevant decisions about the impact of your digging? Do you deploy any intelligent means of assessing the accuracy of the drilling and/or possible impacts in real time? Are your operators or any Sunoco personnel skilled in understanding the meaning of any data derived by such sensors (if you in fact deploy them for data capture)? Do you have alternative plans when encountering a challenge or is there no intelligent decision making aided by technology to determine a likely negative outcome?

If you don't have metrics based risk driven drilling plan for (temporary) stoppage, please explain why (particularly given the nature of the "high risk" drilling impact on water resources). Please explain, if an infraction occurs, the span of time to remedy and the decision making process entailed to stop work (aka, does it require approval, from whom and the expediency to response criteria you have established).

5) When encountering known issues related to contamination due to the pipeline digging, what method of communication will Sunoco/related parties partake in, to inform affected residents? Take a pro-active stance? Or wait for people to die and/or engage in lawsuits?

### III. Stress or Exposure of ME1 Pipeline and impact on ME2 Pipeline

1) While the materials surrounding the existing ME1 Pipeline are not the Karst material in this area (GRADYVILLE ROAD CROSSING PADEP SECTION 105 PERMIT NO.: E23-524 PA-DE-0032.0000-RD and PA-DE-0032.0000-RD-16 (SPLP HDD No. S3-0580 and HDD S3-0580-16) the ground as described in the CES report is a combination harder bedrock layers as well as highly porous non-cohesive soils and saprolite rock (the latter set still having characteristic instability albeit not Karst). In the rock formations, the description of the CES report notes “The investigation yielded evidence of regional fracture traces trending approximately N10°E, N60°E, and N20°W. At least three linear features cross the drill path at 275 feet, 1,520 feet, and 2,740 feet from the northwest entry point, respectively”.

What risks are there in disturbing the ME1 Pipeline – incurring greater risk of exposure and leakage due to pipeline age due to destabilization of ground support around existing pipeline and/or increased exposure to oxygen (accelerating corrosion), or further destruction along the naturally occurring regional fracture lines? Considering the age of the ME 1 pipeline, what risk assessment methods and criteria for determining unacceptable risk in preventing corrosion failure, SCC, and possible rupture or leakage of the existing pipeline due to the “new” drilling (with water likely accumulating at any dig site as has been visibly evidenced here and in West Whiteland will undoubtedly cause advanced pipe corrosion of ME1 if it’s as old as we think it is)?

How are NACE standards such as NACE SP 0204-2015 adhered to given the age of the ME 1 pipeline at this location (1937 is the current estimate of the pipeline at this juncture per history)? How will you insure that the proposed drilling does not or will not disturb the (likely fragile and decidedly one of the oldest oil pipelines in the country) ME 1 pipeline such that either a leak, rupture or other disturbance? Why is Sunoco not responsible for meeting current safety standards of an existing pipeline (ME 1)?

It appears that the highest risk element of this entire operation, beyond the digging and the additional highly explosive materials that will in theory travel underneath our homes from a secondary set of pipelines, is the crumbling nature of the pre-existing oil pipeline infrastructure and the high risk of its failure as being the potential catalyst for an imminent disaster. Can Sunoco insure the public that the current ME 1 pipeline meets today’s safety standard requirements? Has there ever (ever) been in the history of the pipeline since introduced, any overhaul maintenance done? What if any remedies will be taken to “shield” the impact of calamity from ME 1 to ME 2 given any calamity from any one element will result in massive explosive behavior?

2) If any type of disturbance or leakage results of the ME1 pipeline during such drilling, what are your plans to mitigate any impact on any ME 1 dispersions that might leak into the environment? Into the water sources that feed the local wells and ponds and other naturally occurring water sources humans and animals are dependent

on? "...Permitting the continued flow of hazardous liquid through the MEI pipeline without the proper steps to insure the integrity of the pipeline could have catastrophic results impacting the public near or adjacent to the paths of ME1, ME2 AND ME2X...PUC Emergency Stop Order – March 7, 2018"

IV. Thwarting the threat of purposeful (terroristic) threat or accidental natural disaster planning.

- 1) Has Sunoco been requested to review the plans for this pipeline project through the Department of Homeland Security and/or other national security federal and relevant state security agencies? This set of contiguous Sunoco pipeline infrastructures as set forth in this plan, wandering through this densely populated area represents, according to (prior) risk profiles used in government for identifying and determining high risk scenarios, should result in a high risk target area. Given the highly explosive nature of the products to be shipped within the pipelines (and the combination thereof of 3 pipelines), this would seem to represent easy target for any potential domestic or international threat.

If I'm not mistaken, this project should put this entire Philadelphia suburban area into a high risk threat category for loss of life and high impact outcome related to transportation and supplies movement. For terrorist threats, the attractiveness of the fragile nature of this infrastructure and the possible simplicity by which to enact a disaster (high volume explosive materials traveling side by side) creates a simple high risk target.

Has Sunoco conducted (or have they been requested to conduct) a federal vulnerability assessment of such infrastructure planning and as such, conducted such assessment of the risks related to terror (or other natural disaster) event with the relevant regulatory federal agencies? If the scope of risk is limited to only Sunoco's lack of ability to maintain infrastructure within PHMSA, the scope of risk identified is then insufficient. If Sunoco has not been subject to the scrutiny of this planning process done typically by DHS, the federal authorities should be notified and involved in determining the risk factors and the considerations therein related to the project.

V. Communications

What method of timely communication will Sunoco/related parties partake in, to inform affected residents of the following?

- 1) Explicit addressing of the concerns noted here and in others who have asked for clarifications. Silence (ignoring the questions) is not an option
- 2) Secondary notification if drilling is to occur, the specific time, dates and planned activities (so if we have to lose water or have water contamination we know when to watch for it)

- 3) Issues/Problems/Others items – when drilling activities incur incidents (already described prior, characterized based on risk levels)
- 4) Open Channel – where residents or others may explicitly report problems resulting from the digging
- 5) Assuming no incident during the digging(s) – A report of the closure of any successful digging
- 6) Risk Factors Re-notification: Given the highly explosive nature of the materials to be put in our neighborhoods, Sunoco/DEP and local authorities must provide residents a thorough risk factors action guide and response plan in the event of emergencies which would incur if any leaks or ruptures are to occur, including, the linkages of ME 1 malfunction and its impact on materials being carried by ME2. (12)

#### **14. Comment**

I am writing about Sunoco's latest plan for the ME2 pipeline. Specifically, my concerns are about the stretch of HDD proposed along Valley Rd between Gradyville Rd and Sycamore Mills Rd.

Sunoco is required to consider alternate routes for ME2, and I am struggling to understand how they can claim that this is a reasonable choice. Considering the previous 2015 Sunoco pipeline leak which resulted in contaminated soils including MTBE in the area, HDD is almost certain to contaminate additional wells. This pollution needs to be contained, and running a pipeline through the area is likely to result in disastrous results.

The DEP must protect the citizens of Pennsylvania from precisely this type of activity and require Sunoco to find a more acceptable route. (13)

#### **15. Comment**

With Sunoco urging homeowners to sign up for "water buffaloes" before they begin drilling on Valley Road, the message is clear that Sunoco has little or no regard for the safety and well being of local citizens. Add to that the fact that the land in the area is already contaminated with petroleum and MTBE and it becomes a disaster waiting to happen.

If Sunoco refuses to find another site for the pipeline, the least they should be required to do is install a flow back water containment system.

However, considering the potential risks to people and property, Sunoco should be required to find an alternative route for this section of the Mariner 2 pipeline.

Please carefully consider these issues before permitting Sunoco to proceed with this pipeline. (14)

## **16. Comment**

RE: ME2- Pennsylvania Pipeline Project HDD Reevaluation Report for HDD No. S3-0580 and HDD S3-580-16

DEP's Mission Statement: To protect Pennsylvania's air, land and water from pollution and to provide for the health and safety of its citizens through a cleaner environment.

Please honor the Mission Statement of the DEP and protect our environment by halting the PA Pipeline Project. Otherwise, you will be allowing Sunoco Pipeline L.P. (SPLP) to poison and harm children and families in our neighborhood. The stop sign, featured below is located at our school bus stop on Birchwood Lane and is directly across the street from Sunoco's Horizontal Drilling Site on Valley Road in Edgemont Township. Our only source of water is our private well, which is within 150 feet of the HDD site and within 100 feet of this stop sign. According to the HDD analysis report provided by Sunoco, our water supply will be ruined and contaminated. Mariner East 2 endangers our environment and our lives.

We have 19 children in our neighborhood ages 2 months to 18 years old. However, there are many other families with children who will be harmed by Sunoco. They also reside in the Blast Zone. Our children are doubly doomed, as many of them attend Glenwood Elementary School in Media, PA. Glenwood is less than 900 feet from Mariner East 2. Glenwood has almost 500 students, ages 5 to 12, who someday may be injured by this toxic and deadly pipeline. Because of their schools' proximity to the pipeline, there are thousands of lives across Pennsylvania's Blast Zone that are at risk because of SPLP's terrible track record. Sunoco just reported its 300th pipeline leak since 2006. According to the report of the accident, it was a leak of hazards liquids in Sinking Spring, Berks County PA on January 15, 2018. Sunoco continues to damage and pollute our environment.

DEP, we beg you to follow through on your mission statement and take the proper steps to protect our environment, to insure the safety of our community, and to allow us continued access to our clean water source. Please stop Sunoco/ETP from constructing ME 2. The damage to our aquifer will be permanent.

As you are well aware, Sunoco has supplied misleading and incorrect information to all involved parties, like homeowners, the DEP and the PUC over the years. Initially, when completing their permits, Sunoco failed to disclose that families, who live along Valley Road, depend solely on their private wells for their water source. They had the correct information but did not report it. In 2010, I had provided Sunoco with the survey of my property at 1002 Birchwood Lane. It clearly identified the location of our well head. Even the URL, that was provided to homeowners in Sunoco's March 2nd cover letter regarding their HDD Reevaluation Report, is incorrect.

Here a few examples of Sunoco's failure to notify residents, the DEP, and Public Utility Commission:

The three sink holes on Lisa Drive in West Whiteland. The first one, which was 8'x3' was discovered 3 months ago in December. Two more sink holes which are 8'x15' and 15'x15', were discovered in early March. Reports show that these were reported to the Public Utility Commission by residents and not by Sunoco.

In July 2017, Senator Dinniman's staff spoke with residents of the 739 private and public wells in West Whiteland Township after Sunoco caused their water supply to become cloudy and discolored. None of those residents were notified by Sunoco.

The DEP cited Sunoco for a November 10, 2017 leak of 1000 gallons in wetland of Swatara Township in Dauphin County. Who was the first to notify your department and how quickly did Sunoco acknowledge their wrongdoing?

In a Nov. 11, 2017 incident in Berks County, DEP cited Sunoco for using an unauthorized method to install its Mariner East 2 pipeline under an unnamed tributary of Hay Creek, causing a leak of drilling fluid. Was it Sunoco who came forth and admit their wrongdoing?

We can not trust Sunoco to protect our environment, water supply or health. Once Sunoco damages our aquifer from HDD, how many days do our children have to drink contaminated before SPSL feels compelled to warn anyone or to act? Furthermore, damage to an aquifer is permanent. There is no man made fix.

According to page 2 and 3 of their report from the PADEP Section 105 "...features of concern from this HDD review include the complex structural geology with a high degree of fracturing and proximity to residential wells... Although the geology at HDD S3-0580 is similar, the increased fracture density as evidenced in the geotechnical data core obtained for this location indicates an increased risk of fluid losses and Inadvertent Returns as compared to nearby HDDs."

Sunoco has a history of not readily notifying governing authorities whenever they have caused leaks, water contamination, sink holes, and other environmental damage. SPSL has history of failing to notify homeowners, failing to act immediately and failing to remedy the solution. Therefore, no one should have confidence in the following statement "...or if the means of filtration is insufficient to prevent the discharge of turbid water...then the produced waters will be pumped to storage tanks... SPSL will promptly thereafter notify the landowners with private water supplies " Again, how many days do our children have to drink turbid water before SPSL feels compelled to respond? Once the aquifer is destroyed, we will never again have access to this clean water source.

Page 4 of the HDD Hydrogeologic Reevaluation Report says "the borings describe variegated and micaceous soil with weathered rock, indicating the presence of saprolite. Saprolite inherits properties of the bedrock, including fractures that may act

as a preferential flow of paths for drilling fluids.” These paths will inevitably contaminate the well water on Birchwood Lane off of Valley Road.

Section 2.2.2 Bedrock Lithology indicates that our well water will be easily comprised due to “the borings recorded “very intensely” fractured...” Sunoco’s “investigation yielded evidence of regional fracture traces...” Under Section 2.2.7.. “that the numerous weathered, fractured, and sheared zones encountered by these boreholes indicate that in-situ the compressive strength may be significant lower than reported by the laboratory.” Sunoco admits that it is only a matter of time before our water supply becomes discontinued and/or tainted. Again, are we expected to trust that Sunoco will notify us when the damage occurs?

DEP, why would you allow Sunoco to drill on Valley Road when the “HDD S3-0580 location is identified as a unit of relatively poor groundwater production” (Found in 2.2.8 Results of Geotechnical Borings) Not only do the residents along Valley Road have to worry about muddied water, but now our water supply may be completely disrupted. We have no other water source.

From 4.2 on page 11 of Sunoco's report: “The synthesis of regional and local geologic land development data for the HDD S3-0580 site suggests a moderate to high-risk of drilling mud loss, drilling difficulties related to bedrock type, the potential for inadvertent returns and the potential to encounter petroleum hydrocarbon residue existing within the drill path.”

Anyone want to take a guess at who caused the petroleum hydrocarbon residue? Please refer to Section 3.1 on page 10 of Sunoco's report about their release of “petroleum (diesel, kerosene and gasoline)... near the Valley Road/Gradyville Road intersection...A pinhole...in the SPLP 12 inch diameter Point Breeze to Montello Pipelines.” Our neighborhood kids could easily walk to this intersection from home. Sunoco temporarily fixed this leak in 2015 but waited 27 months before they permanently repaired it in July 2017. Sunoco caused this leak. Sunoco continues to contribute to Methyl tert-butyl ether pollution. Please stop Sunoco/ETP from irrevocably damaging our environment, water supply and health!

Our private well water is our only source of water supply. It would take at least a year before we would have access to water from any newly built infrastructure carrying public water. The Sunoco Water Buffalo solution is ridiculously inadequate. I've been contacted by Percheron about installing a temporary water supply. I find that an unacceptable risky proposal both on a permit/installation and maintenance basis. To date the specific details of this proposal have not been provided. These include but are not limited to, install, contractors, township permits, contingency for natural disasters or maintenance failures, electricity consumption, equipment damage and property wear and tear. Ms. Yordy, I copied you on the attached email that I sent to Lance Vaught from Percheron and I will include his recent reply. It does not provide any substantial, detailed or reliable information, nor do I trust their assurances.

According to the following statement issued in a report from Sunoco to the DEP, dire consequences and dangers of building this highly explosive and toxic pipeline, are to be expected. “Private and public water supplies may be impacted by hazardous material spills during of the project activities including, open trenching, HDD and auger bore installation, and block valve and pump station construction and installation, and hydrostatic testing” This statement can be found in Sunoco’s Water Supply Assessment, Preparedness, Prevention and Contingency Plan dated December 2, 2016 and revised August 8, 2017.

Please honor your mission statement and take the proper steps to insure the safety of our community, to protect our environment and to allow us continued access to our clean water source. Please do not allow Sunoco to permanently damage our environment. Please stop the Pennsylvania Pipeline Project. (15)

#### **17. Comment**

DO NOT allow Sunoco to drill at Valley Road through an area of known groundwater pollution, spreading the pollution to wells, aquifers, and streams throughout the area.

DEP must take seriously the risk that this pipeline poses to nearby residents if it becomes operational. A clean environment is essential to human health, and that is certainly critical; but its importance is secondary when human life itself is at stake.

Sunoco must stop spreading MTBE pollution. In 2015, a gasoline pipeline leak was discovered in the vicinity of Valley Road and Gradyville Road. No one knows how long it had been leaking. One consequence was the appearance of a gasoline additive, MTBE, in some local wells. MTBE that is present in a local source can travel through an aquifer and affect other areas. Even at low concentrations, it imparts a foul taste to the water. It's not clear what other health consequences there may be.

If Sunoco goes ahead with its drilling plan, the drill will pass through the area where the ground is polluted with MTBE. Not only will the passage of the drill spread this pollutant, but the nature of HDD drilling will spread it even more effectively. (16)

#### **18. Comment**

This is a bad idea by Sunoco due to the leak and saturation of soil with MTBE in 2015. Many homes' wells along the route risk being contaminated and permanently ruined. If a frac-out occurs, aquifers and nearby Chester Creek will be contaminated as in July 2017 in Middletown Township. My own water was ruined and I ended up in the ER due to an increased lead level. Soon, there will be no clean water anywhere. Sunoco has another route! (17)

#### **19. Comment**

Please consider these comments. I am concerned about the environmental damage consequentially heightening human health and safety and welfare risks, and the direct risks to human lives, in local area and state.

1. Sunoco did not consider an alternative route, as required by August 9, 2017 agreement. Not putting humans, flora and fauna in danger should be the priority. To run this pipeline through high-traffic and populated areas, endangering wells and anywhere the MTBE and other pollutants may travel, in an area already polluted with MTBE, is extremely risky.
2. Please require Sunoco/Energy Transfer to address the MTBE problem in the area. The spread of MTBE contamination would be an unwelcome addition to Pennsylvania.
3. Please tell Sunoco/Energy Transfer that contaminating wells is unacceptable. Their plan seems to accept the possibilities, and to find water buffaloes to be like for like exchanges for well water, which they are not.
4. How will Sunoco/Energy Transfer handle flow back to effectively monitor (not just for odor and appearance) and contain spills, to prevent polluting Chester Creek and all land near the site? The MTBE and petro add to the concern, especially based on the history of flow-back issues at Shoen Road in West Whiteland and Tunbridge Apartments in Media. The likelihood of contamination at Gradyville Road Crossing is known so should be prevented. (18)

**20. Comment**

Please review the pollution issues and the damage being done to the wells and water table for the entire project. We have seen enough damage and destruction throughout the entire project path. There needs to be due diligence to ensure this project is safe for the PA community or is it only benefiting Sunoco?

Please support the people of PA and ensure that our families and communities are safe. (5)

**21. Comment**

I purchased my home 2 years ago, prior to ME2 construction.  
I saved my life savings to buy my dream home here and I regret it every single day of my life.

My family's health and lives are in danger. This pipeline runs 200 feet from my well and 10 feet from an aquifer that feeds my well.

I am in a blast zone as it runs next to my house

My elementary school is in a blast zone.

I drive next to the pipeline.

I sleep next to it.

My children go to school next to it.

It has overtaken my life.

I walk my dog on top of the pipe.

For what?

Corporate profits, international gain and politicians of PA accepting money which risks my life and everyone in my community.

SHAME ON YOU.

I have been asked to put a water buffalo on my property because my well is in danger.

Why is this ok?

Do we live in a 3rd world country?

I can't even drink water at my house?

After moving in to my home, I found out the largest pipeline spill in PA history was on Meadow Lane in Glen Mills, Edgemont Township at the responsibility of Sunoco. They lost in court.

My backyard just finish me off and make it even worse.

I would have avoided spending 500k to buy a home here.

After moving in I found out that there was a gas spill on Valley Rd near Gradyville and the ground is contaminated.

And now they are boring thru this area disturbing the ground and effecting my family's life?

Impacting my water?

Putting our lives at risk?

And you think this is ok?

You think it is acceptable to do all of this and then offer me a water buffalo because you know my families water is at risk?

You are a legal terrorist.

You are a legal drug dealer.

You have destroyed our community.

Not Sunoco.

But you, who allowed this.

You allow children and women and families to live in danger of death with no method of warning.

When something happens, this will be your fault.

You will live life every day knowing your decisions are ruining people's lives financially, mentally and physically.

You should be ashamed of yourselves.

Reroute this pipeline immediately.

Protect us and do not put this pipeline first.

What kind of people are you.

We have been lied to by Sunoco.

Do you know two investigators from the DEP showed up to my house unexpectedly, flashing badges, doing undercover work, because Sunoco is lying to everyone?

I have to explain this to my family.

Protect your people.

Halt the pipe.

Reroute it down I95 corridor.

Spend the money to do that and don't run it here because it's easier.

Shame on you (19)

## **22. Comment**

Stop drilling through areas that have delicate ecosystems, especially ones where pollution has been left behind from previous Sunoco screw-ups! Our beautiful state, our neighborhoods, our properties are being destroyed. All in the name of greed. (20)

## **23. 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 numbers HDD PA-DE-0032.0000-RD and PA-DE- 0032.0000-RD-16 (the “HDD Site”).

### The Department’s Review

Pennsylvanians rely on the Department of Environmental Protection to protect them from dangerous activities that threaten their air, water, land, and health. The Department has recognized that the construction of Mariner East 2 has done damage to the public already. The purpose of Sunoco’s re-evaluations of certain HDD sites is to do a better job avoiding harm to the public and the environment in its HDD construction. The Department’s role is to review and assess Sunoco’s Report before deciding what action to take on it.

It is the Department’s duty to review and assess the Report with the goal of protecting the public and the environment placed first and foremost. Looking at the individual circumstances at the site in question is key. Critically important is accounting for input from those who live nearby, who have a deeper connection with—and greater knowledge about—the land than the foreign company building the pipelines through it.

A meaningful, objective and substantive review and assessment by the Department will ensure that new or further HDD operations at the re-evaluated sites will cause minimal, if any, harm to the public and the environment. Anything less than a full, careful, and objective review would 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 approving Sunoco’s recommendation only if it would protect the public and the environment from any further harm.

### Comments on HDDs PA-DE-0032.0000-RD and PA-DE-0032.0000-RD-16

“The synthesis of regional and local geologic land development data for the HDD S3-0580 site suggests a moderate- to high-risk of drilling mud loss, drilling difficulties related to bedrock type, the potential for inadvertent returns, and potential to encounter petroleum hydrocarbon residue already existing within the drill path.” This

is the conclusion of Sunoco's hydrogeology consultants on the risks presented by this HDD Site. Nonetheless, amazingly, Sunoco proposes only to follow some best practices. As explained below, the risks far exceed any reward in running the pipeline in this location.

A dangerous and unaccounted-for risk of historical petrochemical contamination to water wells exists at this site. The Hydrogeologic Report explains that:

On April 10, 2015, a release of petroleum (diesel, kerosene, and gasoline) was reported west of Valley Road near the Valley Road/Gradyville Road intersection. A pinhole leak was identified in the Sunoco Pipeline Limited Partnership (SPLP) 12-inch-diameter Point Breeze to Montello Pipelines, which was temporarily repaired on April 11, 2015, then permanently repaired in July, 2017. Interim environmental response actions completed by SPLP included installation of soil borings, groundwater piezometers, and monitoring wells to delineate the magnitude and extent of impacted soil and groundwater associated with the release. The soil and groundwater data indicated a small area located next to the release point where free-product petroleum was reported in only one monitoring well location (MW-5). As part of the interim and ongoing site characterization work four (4) recovery wells were installed to remove the residual free product petroleum and to further characterize the nature and extent of the release. It is GES' understanding that this data has been incorporated as part of the HDD construction preparation and response planning activities.

There are several problems with this statement. The first is that this is the extent of the analysis Sunoco does on the threat of mobilization of contamination from petroleum underground in the area. GES says that it "understand[s] that this data has been incorporated as part of the HDD construction preparation and response planning activities." But it is not at all clear that that is the case. There is no evidence of it. Where are the four recovery wells? What is the extent of the plume? Sunoco did several borings in this area, knowing of the contamination which it caused, and does not appear to have examined the borings for evidence that the plume is or is not present along the planned HDD alignment. If it has such evidence, it must be provided to the Department and the public. If it does not, Sunoco must do the work to determine the extent of the plume.

The Department should demand that Sunoco make this data available and explain how it "has been incorporated as part of the HDD construction preparation and response planning activities."

The only thing Sunoco plans to do to mitigate this risk, according to the Report, is the following:

Drilling fluid returns, drill cuttings, and produced groundwater should be carefully monitored for presence of volatile organics during this project. If

olfactory evidence, elevated photoionization detector (PID) readings, or a sheen suggest petroleum contamination drilling should be suspended until cuttings and water samples can be analyzed. Affected materials should be screened prior to disposal and a proper disposal plan prepared for such materials.

The greatest danger is not that the drill cuttings get contaminated; it is that the plume is mobilized underground and spreads to any of the dozens of water wells in the immediate vicinity of the drill. Sunoco has no plans to deal with that.

The second thing wrong with the statement on the 2015 spill is that it fails to mention that MTBE was detected in water wells hundreds of feet from the pipeline breach location after the spill. MTBE is a notable groundwater contaminant that can render water unpotable in very small quantities. The Commonwealth has spent nearly three-quarters of a billion dollars to clean up leaks of MTBE.

The third thing wrong with the statement is that it characterizes the location of the spill as “west of Valley Road near the Valley Road/Gradyville Road intersection.” It is only “west” by a few feet at most. This is within the same right-of-way as the proposed HDD alignment. As explained in the attached contemporaneous email exchange, it is “right at the PECO utility pole,” which is right on the Valley Road roadside.

The fourth thing wrong with the statement is that it mischaracterizes the extent of soil contamination as restricted to a “small area located next to the release point.” As just noted, underground contamination from the gasoline additive MTBE was found hundreds of feet from the release site. Where exactly the plume is located is vital information for protection of water supplies which is wholly absent from this Report.

Just as important, this may not be the only petrochemical plume near the site. In 1992, Sunoco’s pipeline spilled thousands of gallons of jet fuel on nearby Meadow Lane. Other spills in the immediate vicinity may have gone undetected underground, but could be mobilized by the drilling. The Department should require Sunoco to investigate and locate the bounds of all underground contamination along the HDD alignment in this densely populated neighborhood reliant on dozens of wells for its drinking water. Otherwise, this is a disaster in the making.

Sunoco’s well production zone analysis is inadequate. Sunoco pads the “Hydrogeology, Ground Water, and Well Production Zones” section of its Report with a host of information intended to impress upon the reader that it is impossible to determine where wells near the Site draw their water from and Sunoco therefore can do nothing to protect these wells. But in fact, this is bogus. The Department manages Pennsylvania’s implementation of the Wellhead Protection Program, which relies on “the delineation of wellhead protection areas … developed based on hydrogeologic investigations conducted by the U.S. Geological Survey for DEP.” The Department did not throw up its hands trying to figure out what the wellhead

protection areas are and say, “beats me, it’s too hard.” But that is what Sunoco has done here. This is in violation of the Order’s requirement of a well production zone analysis.

Sunoco instead suggests that offering water testing, which Sunoco is already required to do, should quell any concerns with water contamination. This is not acceptable. This is exceptionally problematic because Sunoco identified 26 water wells within 450 feet of the HDD alignment. This is a dense area with a large number of potentially impacted residents.

The Hydrogeologic Report explains: “It has been verified that 26 properties are located within 450 feet of the HDD S3-0580 ROW with all but 3 properties served by residential wells. These wells are open cased at the same depth as the boring, which increases the risk of impact by drilling fluids.” The Report further explains, “The location of the HDD along a groundwater recharge zone, a complex structural geology including a high degree of fracturing, 30 to 32 foot difference between the water table and southeast entry/exit point and close proximity of residential wells represent potential adverse risks for this HDD site.”

Yet Sunoco proposes to do more or less nothing to investigate and defend against the dangers.

Damage to a resident’s private water supply is illegal and actionable trespass to property and nuisance, as well as a violation of environmental protection laws. The provision of a temporary water supply before contaminating someone’s well is like putting on boxing gloves before beating them up—it’s the least you can do, but by no means acceptable conduct. The Department must prevent harm, not merely try to dampen it. The Department should not authorize HDD operations which are at high risk of causing an illegal trespass and contamination of water wells. Rather, the Department should demand an actual evaluation of risk, and if the risk is too high, a change in plans.

The Department should require details about how and where Sunoco will handle produced groundwater due to the 55-foot change in elevation from entry to exit. In other instances, the Department has required more protective measures to be put in place where there is the potential for significant volumes of groundwater to be produced due to changes in elevation between the entry and exit holes of the HDD. See, e.g., December 19, 2017 letter from DEP to Sunoco re Yellow Breeches Creek HDD location. A similar change in elevation is present here, and the Department should require similar protective measures here as well.

The alternatives analysis ignores alternatives to HDD, conventional augur boring, and open trenching. Sunoco only considers those three possibilities at the Site, and claims it cannot use conventional augur boring because of “the curvature requirements to follow the exi[s]ting utility easement and the inability to steer an augur bore into curves.” But Sunoco has acknowledged it also uses “FlexBor” technology, guided bores, and guided augur bores, all of which can steer.<sup>6</sup> In fact, it specifically notes

that guided boring “is commonly used when working adjacent to or when crossing other utilities.” Due to the particularly hazardous nature of using HDD at the Site, the Department should require a detailed and convincing analysis by Sunoco of why other methods of boring would not be possible to use instead.

Sunoco claims adjustments have been made to the HDD profile, but none are evident from the Report. Sunoco makes the following statement in its Report: “HDD specialists and geologists employed by SPLP have investigated the HDD design and subsurface geologic conditions for HDD S3-0580, and made minor adjustments to the profile design, which included a minor extension in length of the 20-inch as detailed in the introduction section above.” The introduction section provides no such explanation. It is unclear what exactly was changed and why, as there is only one set of HDD profiles provided in the Report. There is a little more explanation in the Hydrogeologic Report but again, no explanation of why the changes were made. The Department should require an explanation.

Thank you for considering these comments. Please keep us apprised of your next steps on this HDD Site. (21-25)

Letter – [Clean Air Council – 3-16-18 – Gradyville Road Crossing](#)

#### **24. Comment**

This letter is in response to Sunoco re-evaluation analysis for HDD drilling site Gradyville Road Crossing in Edgmont PA. DEP section 105 permit SPLP HDD No. S3-0580 and HDD S3-0580-16. The Township has the following concerns or questions that need to be clarified in response to reviewing the analysis:

- Statement: The opening paragraph indicates that “This data will be used to evaluate the water chemistry and other physical characteristics of the water quality at the specific well location before, during and after construction, and if an impact occurs, the permit requires replacement of the water supply to the satisfaction of the well owner.”
- Township’s Question: At what point will Sunoco “test for impact”? Sunoco needs to provide specific timeframes for testing.
- Statement: Page 4 of the report under 2.2.2 “Bedrock Lithology” states “Four geotechnical borings evenly spaced along the alignment were advanced to depths between 13.8 and 30 feet. The borings recorded “very intensely fractured,” weathered gneiss, suggesting saprolite to a depth of at least 30 feet.
- Township’s Question: Saprolite is a clay-rich rock and as such, there is a concern about future settlement of the pipe. Does Sunoco have any special procedures for areas such as this that contain highly weathered rock?
- Statement: Page 12 of the report states “A contingency plan to connect nearby residents to a supplemental water supply should be prepared in case it needs to be implemented. Identifying the closest public water service and its respective proximity to the HDD should also be completed.”

- Township's Comment: To date the Township has not seen such contingency plan in the event that nearby residents' water supply is compromised. Sunoco must complete this report urgently and expeditiously so that residents have assurances that safe water will be provided to them in the event that alternate water supply is needed.
- General Comment: This section of the proposed HDD contains a previous site that was contaminated by Sunoco's Breeze Point to Montello 12" pipeline in April 2015 at the address of 1436 Valley Road. To date, this area has yet to complete the DEP-Required Act 2 Remediation. In meetings with Sunoco, the Township has insisted that Sunoco complete this remediation, in accordance with all required standards and secure the required permits, PRIOR to completing the HDD boring in this section of Valley Road. DEP must insist that this be completed prior to allowing this HDD to continue in this area so as not to further disrupt the contaminated areas prior to them being remediated.

These comments, questions, and concerns are respectfully submitted on behalf of the Edgmont Township Board of Supervisors. Thank you. (26)

## **25. Comment**

RE: ME2- Pennsylvania Pipeline Project HDD Reevaluation Report for HDD No. S3-0580 and HDD S3-580-16

DEP's Mission Statement: To protect Pennsylvania's air, land and water from pollution and to provide for the health and safety of its citizens through a cleaner environment.

It is my hope that you have the ability to honor the Mission Statement of the DEP and protect our environment by halting the PA Pipeline Project. I understand that my neighbors have reached out to you with the same request; and I hate to be redundant, but I am extremely concerned about the project that is occurring within a few feet away from our front door. If you are unable to halt this project, Sunoco Pipeline L.P. (SPLP) will begin to poison and harm children and families in our neighborhood. Our only source of water is our private well, which is within 150 feet of the HDD site and within 100 feet of this stop sign. According to the HDD analysis report provided by Sunoco, our water supply will be ruined and contaminated. Mariner East 2 endangers our environment and our lives.

We have 19 children in our neighborhood ages 2 months to 18 years old. However, there are many other families with children who will be harmed by Sunoco. They also reside in the Blast Zone. Our children are doubly doomed, as many of them attend Glenwood Elementary School in Media, PA. Glenwood is less than 900 feet from Mariner East 2. Glenwood has almost 500 students, ages 5 to 12, who someday may be injured by this toxic and deadly pipeline. Because of their schools' proximity to the pipeline, there are thousands of lives across Pennsylvania's Blast Zone that are at risk because of SPLP's terrible track record. Sunoco just reported its 300th pipeline leak since 2006. According to the report of the accident, it was a leak of hazards

liquids in Sinking Spring, Berks County PA, on January 15, 2018. Sunoco continues to damage and pollute our environment. Further, myself and many of my neighbors care a great deal for our vegetable garden and consume its yields, as well as enjoy the flowers, plants and trees we've spent years creating. If Sunoco continues with this damaging project, I fear the results will have a negative impact on our gardens as well. DEP, we beg you to follow through on your mission statement and take the proper steps to protect our environment, to ensure the safety of our community, and to allow us continued access to our clean water source. Please stop Sunoco/ETP from constructing ME 2. The damage to our aquifer will be permanent.

Why would you allow Sunoco to drill on Valley Road when the "HDD S3-0580 location is identified as a unit of relatively poor groundwater production" (Found in 2.2.8 Results of Geotechnical Borings). Not only do the residents along Valley Road have to worry about muddied water, but now our water supply may be completely disrupted. We have no other water source.

Edgmont township is a small township in Delaware County compared to our neighboring township – Middletown township, and it is my understanding our township administrators are not receiving adequate and timely information from Sunoco Pipeline L.P. As a result, many residents in our township remain uneducated about what is happening. Those of us that are Internet savvy are made aware of meetings held by our township where a Sunoco representative will be present to answer questions with only a few hours notice, which is not sufficient to mobilize a plan that will provide a household representative to be present – which frankly, feels like Sunoco's intent. How is it that bullying is not allowed in other public sectors, but here – a company is allowed to bullying residents by overriding the law in their favor?

On October 31, 2017, I received a certified letter from Mark McConneell, Land Project Manager representing Sunoco which offered a number to reach if we were in the blasting zone. I will send a copy of this letter for your review later this evening. Per instruction, I spoke with Amy Johnson at the number provided and was told that only natural gas products that do not include butane, methane or propane would be transported. She appeased my worries by saying that there is nothing to worry about and she explained how harmless the horizontal drilling process is to our environment. Further, she informed us that our well is not located in the area where they would be providing us with a private water supply. A few months later, we received another letter from Sunoco offering us a temporary water supply fix while they drill which would not be sufficient for the size of our house and our family. Amy Johnson was greatly misinformed about this project and its impact on our household, as well as our neighbors! I am sickened by the events Sunoco has managed to pursue so close to our home, and with so little regard to human life, animal life and the overall environment.

Please honor your mission statement and take the proper steps to insure the safety of our community, to protect our environment and to allow us continued access to our

clean water source. Please do not allow Sunoco to permanently damage our environment. Please stop the Pennsylvania Pipeline Project. (27)

## **26. Comment**

I am writing to comment on the Sunoco plan for HDD at the “Gradyville Road crossing” in Delaware County. There are many things wrong with this plan.

1. They did not consider alternative routes, even though the August 9 settlement required them to. There are alternatives with far fewer houses and wells on either side of the planned alignment. Instead, they plan to run it right down Valley Road, through the most populated part of the area.
2. They will be spreading MTBE pollution. Their drilling plan means that the drill will go right through ground that is known to be contaminated with the gasoline additive MTBE from a 2015 pipeline leak. The drilling will spread it to wells, aquifers, and nearby streams; and the circulation of the drilling mud will ensure that it goes everywhere along the route.
3. They admit that they will be destroying wells and aquifers. How can the DEP go along with a plan where the company’s own geological report says that they are in danger of destroying drinking water?
4. The flow back of ground water will pollute Chester Creek. It will be contaminated with MTBE.
5. This pipeline poses a risk to human life that has never been closely examined. It’s wonderful to have a clean environment, but first you need to protect life and keep people from the possibility of being seriously injured.

You need to send Sunoco back to the drawing board on this one. This is one of the worst of the hundreds of plans that Sunoco has filed, for all the reasons listed above. Make them do better! (28)

## **27. 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 # Horizontal Directional Drill Analysis Gradyville Road Crossing PADEP Section 105 Permit NO.: E23-524 PA-DE-0032.0000-RD and PA-DE-0032.0000-RD-16 (SPLP HDD No. S3-0580 and HDD S3-0580-16).

Those of us who live in the Commonwealth rely on the Governor, the PA Attorney General, the PA DEP, the PA PUC, our elected officials and township personnel to protect us as you have the knowledge and authority to do so. Despite claims to the contrary, the butane, ethane, and propane transported by Sunoco are for export

purposes. No sensible person truly believes that they are for use here in the state of Pennsylvania since ME 1 has sufficient capacity to supply intrastate needs without ME 2. Nevertheless, residents of PA are being forced to bear the brunt of this company, now Energy Transfer Partners, which engages in bullying, harassment and intimidation tactics. They are destroying wetlands, forests and residential neighborhoods for corporate gain while the constituents of Pennsylvania are suffering loss of value of their home, loss of privacy and our roads and neighborhoods are being torn apart. The DEP's role is to review permits with the intent of protecting the environment, water sources and the health and safety of residents. The PUC has the responsibility to assess the need for this infrastructure and to determine what, if any, benefit there might be for the people of Pennsylvania in the additional ME 2 capacity. The few new jobs being created in Marcus Hook do not outweigh the terror of living next to a highly volatile pipeline which can leak gases capable of killing hundreds of children in what is supposed to be one of their safest environments, their schools.

It is well known that Sunoco did not do its due diligence when preparing the permitting documents. There was no attempt to obtain proper geological studies of the proposed path of the pipe. If those studies had been done, utilizing modern technology, post 1930, and today's data which is readily available, it would have been clear that installing a pipeline thru this region was not a wise decision.

Edgmont Township is known to have bog turtles living along, and literally right next to the path of this construction. Sunoco began this project by clearing trees unlawfully, before any permits had been issued, so as to eliminate brown nose bat habitats. During the continued construction, they have proceeded to do whatever they wanted to do with total disregard for the authority of the DEP, the conservation Districts, and state and local government authority.

Sunoco failed to identify the hundreds of wells located along the path of the ME2 construction. It ignored homeowners when they tried to correct Sunoco's faulty data. It purposely provided false information when addressing water sources in Edgmont Township as they claimed that public water was available. There is no public water infrastructure in most of the western part of the township near the pipeline construction. Sunoco refuses to address the location of well aquifers. When discussing private water sources, it utilizes a standard of its own choosing. Sunoco only recognizes well heads located within 450 feet of HDD activities. Good science cannot ignore the fact that aquifers may be located outside an arbitrary arc of 450 feet from an HDD drill site. The question is the affect upon the quantity and quality of private water sources. Please instruct ETP/Sunoco to address the concerns of those whose aquifers lie in the path of, or near, the HDD. The drill site located near the junction of Valley and Gradyville Roads is the site of a 2015 pipeline leak/spill. This area is still being monitored for contamination. Permitting drilling in an area known to be contaminated is irresponsible and puts the health and safety of residents at risk.

The drill site located at Shepherd and Meadow Lanes is another site of a recent spill. That particular site is also slated for HDD and that immediate area is known to have

petroleum related substances in the soil per recent soil samples. The proximity of these two drill sites to past spills makes them prone to spreading harmful chemicals from the previous spills. It has been documented that these areas are likely to create new fracture lines which increases the likelihood of contaminants seeping into previously unaffected private water sources. Contamination of these water sources is not something that can be undone, the result will be permanent. A more exact hydrogeological water flow study should be required to determine the path of the water. We need a proper assessment of these areas. Sunoco should be required to share the results with the general public. We are tired of Sunoco's approach: drill, hope that the adverse results are not discovered, and react after the fact when something bad happens. It is just wrong to permit it to continue operating when they openly ignore the DEP, refuse to report "frac-outs" and willfully engage in HDD in areas where it is not permitted. Modern technology and tools are available to Sunoco to conduct a proper assessment. Sink holes open up and Sunoco fails to properly inform the DEP, the PUC, effected townships and the PHMSA! Some governmental authority must be asserted!

Sunoco had open trenches along Valley Road where ME1 was exposed for weeks at a time. In one instance, ME1 was exposed for months. Sunoco contractors drive backhoe's, tri-axels, track hoes and other construction equipment over ME1. This is an ME 1 disaster waiting to happen.

There has been no input permitted from those of us being impacted by this project. No public meetings with the DEP or the PUC. It was more than a year after decisions were made that homeowners finally became aware of this project. No one told landowners of the true nature of the products which Sunoco intended to transport. Sunoco representatives simply told homeowners that it was too late to object. Why would the DEP not turn to those who live and work locally to ensure that the information provided to them by Sunoco was correct? Why did the DEP not insure that Sunoco/ETP avoided drilling in high risk areas? Why do the PUC and the DEP not insist that Sunoco avoid installing pipes in densely populated areas that contain schools, nursing homes, group homes, apartments, and retirement communities whose residents are the most vulnerable? Query – whose job is it to protect the public? Sunoco made up its mind to complete this project only one way – its way. It refused to consider alternative routes. We are tired of hearing that loss of life is just a cost of doing business. Any failure of this pipeline in densely populated areas would have catastrophic consequences. Failure to address this risk and these potential scenarios whereby the elderly and school children would be killed is unconscionable. What does Homeland Security say about the risk of having so many adjoining pipelines located in this area? If the Department of Homeland Security is concerned, then we should be as well.

We teach our children to be responsible and respectful. We teach our children that there are consequences for bad behavior up to and including expulsion from school. Wouldn't it be appropriate under the circumstances, given what we know about ETP's poor safety record, their inability to properly run a construction project, their

disregard for our state laws and local ordinances, and their willful misconduct, if, finally, those tasked with keeping our environment safe, and our residents safe from highly volatile pipelines, walked the walk and set an example for our children? Maybe it's time to give Sunoco/ETP the option of rerouting this project and if they refuse to do so, then it is time to enforce strict controls to protect our populace and ask Sunoco/ETP to leave our state.

For the above stated reasons, we request that this proposal be denied. (29)