

DEP Permit # E23-524
DEP Permit HDD Reference # PA-DE-0046.0000-RD
DEP HDD # S3-0591
Township – Middletown
County - Delaware
HDD Site Name – Valley Road Crossing

3rd Public Comment Period

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1. Comment

I have grave concerns over the proximity of the HDD site on my street and would like to register my commentary and objections. This is addition to my letter of 13 March 2018.

Having reviewed the Citizens' Risk Assessment study, I would add my concerns around the HDD site that is on my street. We live in close proximity to a working quarry. It regularly executed drilling blasts that shake the foundations and structure of my home. I can only imagine the impact on a volatile gas pipeline. What happens over time to the structural integrity to both old and new pipelines?

To quote from the study

"Highlights from the Citizen's Risk Assessment study:

**Horizontal directional drill" (HDD) entry and exit points are locations of significantly heightened likelihood of release. In the event of a breach along a deeply buried segment, gas will flow along the path of least resistance, which is likely to be the HDD entry exit points. Gas may also be released through fissures or cracks that may have been created during loss-of-drilling-fluid events ("frac-outs").*

**The presence of two pipelines approximately doubles the probability of an accident over a single pipeline. Three pipelines triples the probability, and so on. A doubling of probability represents a doubling of risk.*

**There is a threshold rate of release below which the operator is unable to detect a leak is occurring. This threshold release rate is large enough that it could produce very serious consequences including injuries, death, or property damage.*

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There is a threshold rate of release below which the operator is unable to detect a leak is occurring. This threshold release rate is large enough that it could produce very serious consequences including injuries, death, or property damage."

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. (1)

2. Comment

For those of you who do not live within 1/2 mile of Sunoco/ETP Mariner 1 and 2 East Pipelines, please count your blessings that your family and friends are not in the way of this potentially deadly pipeline that carries odorless, colorless, undetectable and explosive liquid natural gases. While the victims featured in the article had some type of warning, we, in Edgmont Township, will have none.

<https://www.usatoday.com/in-depth/news/nation/2018/11/01/natural-gas-cast-iron-pipeline-explosion-fire-leak-safety-phmsa/1362595002/>

Along with thousands of children that live and go to school along the path of the pipeline, the 19 children that live in my cul de sac, ages 1 to 18, are at greater risk. We are located on Birchwood Lane in Edgmont Township in Glen Mills, PA 19342, less than 200 feet from the HDD Site S3-0591. We strongly oppose the building of this pipeline and greatly fear the Horizontal Directional Drilling that you are contemplating.

HDD S3-0591 should NOT be allowed at the Valley Road location. Please consider the following:

- Horizontal directional drill (HDD) entry and exit points are locations of significantly heightened likelihood of release. In the event of a breach along a deeply buried segment, gas will flow along the path of least resistance, which is likely to be the HDD entry exit points. Gas may also be released through fissures or cracks that may have been created during loss-of-drilling-fluid events (“frac-outs”).

*The presence of two pipelines approximately doubles the probability of an accident over a single pipeline.

*There is a threshold rate of release below which the operator is unable to detect a leak is occurring. This threshold release rate is large enough that it could produce very serious consequences including injuries, death, or property damage.

- Like the many families that live along Valley Road, my family's only source of water is from my well. Our well head is within 60 feet of the ancient Mariner East 1

pipeline and less than 200 feet of ME2. The process of HDD will contaminate our only source of water when it penetrates the aquifer. (If you would like me to send you documented accounts of when this has happened in the past, please let me know.)

- The Hansen Aggregate Quarry is within 5000 feet (less than one mile) from the HDD Site on Valley Road, which is across from my home. If the regular blasts from the quarry noticeably shake the homes in my neighborhood, how has and will this impact the structural integrity of the eighty year old ME1 pipeline? The ME 1 inspection performed by Sunoco contractors on October 30th, 2018 was cursory and visual only. They walked the pipeline's path. They did not uncover the pipeline, nor did they not flush water through the pipeline to check for leaks. Therefore, allowing the combination of HDD across the street (ME2) and a compromised old ME1 pipeline increases our risk on Birchwood.
- Even if the pipeline stays intact and it does not leak or explode, my family and neighbors will suffer serious long term health consequences due to contaminated well water and air quality. Our neighborhood abuts the Sleighton School property which has been documented to have significant levels of arsenic. (ME2 transverses a section of Sleighton Park.) The process of Horizontal Drilling may force arsenic into our water supply and may send it airborne.

http://www.delconewsnetwork.com/mediatowntalk/news/arsenic-found-in-soil-on-former-sleighton-school-property/article_b82fbecf-f26d-5ec3-b1eb-25f2ccfccb79.html

If you have any questions, please contact me.

On behalf of my family members living in my home: my mother, Marina (90 years old), my husband Steve (51), my son, Marcus (age 18) and my daughter, Lauren (age 12) (2)

3. Comment

On October 31, 2018, Sunoco submitted a supplemental letter to the Department in response to the Department's March 23, 2018 request for additional information regarding horizontal directional drilling ("HDD") Site PA-DE-0046.0000-RD ("Site"). Pursuant to the Corrected Stipulated Order entered on EHB Docket No. 2017-009-L on August 10, 2017 ("Order"), and on behalf of Clean Air Council, Mountain Watershed Association, Inc., and the Delaware Riverkeeper Network ("Appellants"), we respectfully submit these comments in reply. Our comments first address point by point Sunoco's letter, then discuss additional matters.

Point 1

Though very late in the game, Sunoco's commitment to conduct surface geophysics at the Site is an important step in the right direction. It is critical, however, that the Department ensure the geophysical surveys are adequate in scope and the results are fully incorporated into the construction plans for the Site. Sunoco has a history of ignoring and obscuring the findings and recommendations of its own scientists in the context of these HDD reevaluations. Commenters and the Department have

identified this practice on multiple occasions. Sunoco also cannot be trusted to fully utilize the results of geophysical studies when it has vehemently rejected the usefulness of precisely such studies: in its previous supplemental filing for this Site, Sunoco claimed, “geophysics will provide no functional information at this non-karst HDD location.”

To avoid Sunoco undermining the value of the geophysical surveying, both the raw data and the expert analysis of the results (including recommendations regarding construction) must be made available to the public with an opportunity to comment. There is also no reason such studies should not be shared, according to the sworn testimony of Sunoco’s Geologist, David Demko. May 12, 2018 Hearing Transcript, Pennsylvania State Senator Andrew E. Dinnman v. Sunoco Pipeline L.P., Pennsylvania Public Utility Commission Docket No. P-2018-3001453, 700: 2-4. While Sunoco has committed to perform surface geophysics, it is still ignoring the Department’s request to perform a suite of downhole geophysics and caliper testing at the Site. These are different survey techniques that provide different data and Sunoco still has neither agreed to perform these additional tests nor provided a valid reason as to why they cannot be performed. The Department should continue to require Sunoco to conduct downhole testing.

Point 2

The proactive measures Sunoco describes in point 2 are not “supplemental” to Sunoco’s previous, inadequate submissions, but merely a recitation of practices that Sunoco is already required to use, has committed to using, or both. The HDD IR Plan plainly requires the use of APM: “The following requirements shall be placed upon each HDD contractor with respect to drilling fluid control: Instrumentation – The HDD contractor shall monitor the annulus pressure of returns during the HDD pilot hole phase of HDD using an annular pressure monitor.” Sunoco also already wrote in its May 21, 2018 letter that “the HDD operator will use an Annular Pressure Monitor (APM), to actively observe conditions in the profile while drilling.”

Similarly, the explanations of “tool face pressure” and “tracking of cuttings removal,” are not new or additional preventative measures; they are standard operating procedures that, while necessary, have proven inadequate by themselves.

Point 3

In point 3, Sunoco describes two grouting measures it may generally use at HDDs, under the heading “Proactive Treatment by Annulus Grouting.” These grouting plans appear to conflict with earlier grouting plans Sunoco described to the Department, which involve the injection of bentonite chips rather than cement or sand/cement. It is unclear if both protocols will co-exist or this is intended to supplant the old protocol. If both protocols will co-exist, it is unclear when one will be used versus the other. They conflict, and so cannot both be operative. For example, Sunoco previously indicated that minor loss of circulation events can be effectively treated with loss control materials. Here, Sunoco says that they “are less effective below 70

ft of the ground surface,” which is where “[m]any of SPLP’s HDD profiles are.” Sunoco should clarify what it intends to follow.

Additional Comments

It has recently come to Appellants’ attention that the Sleighton school property contiguous with the Sleighton Park location where the northern HDD entrance is planned has been contaminated with arsenic. See “Arsenic found in soil on former Sleighton School property,” Bette Alburger, Delco News Network, http://www.delconewsnetwork.com/mediatowntalk/news/arsenic-found-in-soil-on-former-sleighton-school-property/article_b82fbecf-f26d-5ec3-b1eb-25f2ccfccb79.html. Appellants do not know the current status or extent of the contamination, but urge the Department to ensure that soil testing and proper protections be taken at the site, including containment and remediation as needed. The site currently serves as a municipal recreational park. Thank you for considering these comments. Please keep us apprised of your next steps on this HDD Site. (3-7) [Clean Air Council – 11-2-18 – Valley Road Crossing](#)

4. Comment

Sunoco has ignored many of the issues that have been brought up in previous public comments. It is time for the DEP to step up and do its job, which is to protect our water resources from the kind of damage that Sunoco has done elsewhere along the Mariner route. Now, the DEP must insist on answers—and action—in situations where it has failed to do so before and Sunoco has played havoc with wells, streams, and aquifers.

What, exactly, is Sunoco’s plan for monitoring wells along the HDD route? Sunoco promises “regular monitoring.” Is that once a month? Once a year? Once a decade? What tests will be performed?

What will Sunoco do about the possibility of groundwater flow-back at the drill site? In a previous response, Sunoco said this has not happened in the past, but that is wrong. It has happened at Shoen Road and at Tunbridge Apartments, with serious consequences in both cases. It is very likely to happen at the southern end of this HDD, which is lower than the water table throughout the HDD. Not only that, but there is a sensitive wetland area immediately downhill from the southern end of the HDD, and groundwater flowing back to it could cause significant environmental damage.

Will Sunoco be required to provide well depths, casing depths, and water-level depths for all the wells along the HDD route? Sunoco claims to have done this, but of 32 wells listed in the appendix to their plan, 30 have the water level listed as “unknown”. The DEP must insist on this measurement. It will be important in determining whether, and to what extent, wells have been damaged.

What is Sunoco’s plan for water access? In general, Sunoco has not come up with a plan for avoiding damage to wells and groundwater in this part of the route. Since there is no public water available here, what is Sunoco’s plan for providing water to

those whose wells are spoiled? Will the company deliver water in plastic water buffaloes for decades to come? Will it pay to have new wells drilled?

The DEP has not been doing its job in protecting water supplies and holding Sunoco to account. Now is the time to change that. The DEP must insist on real answers from Sunoco, and on real actions based on those answers. (8)

5. Comment

According to the supplemental information to the May 21st letter from SPLP, supplied by Larry Greminger sent on Oct 31st to John Hohenstein to assist in the review of the SPLP proposal, the data and methods were “shared” in the use of the HDD to “minimize the risk of Inadvertent Returns (IRs) and impacts to public and private water supplies during the construction phases of the HDD”. The proposed method incorporates the use of an Annular Pressure Monitor that records the drilling fluid pressures within the annulus of the HDD as the pilot tool advances, and the supplemental information notes the follow:

“...Abrupt decreases in AP are indicative of drilling through a fracture, and are typically accompanied by a Loss of Circulation. Declining AP while progressing forward is indicative of formation weakness and loss of fluids to the surrounding formation...”

And the “corrective” action upon encountering such “weaknesses” (weaknesses related to supporting a pipe, not related to the naturally occurring flowing water in this region) is noted below.

“Accordingly, corrective action to address the presence of fractures or unstable geology at greater depths below ground requires grouting of the HDD annulus. Two types of grouting will be utilized for corrective actions to seal fractures and stabilize zones of weak geology. These are: 1) grouting using “neat cement”; and 2) grouting using a sand/cement mix. Neat cement grout is a slurry of Portland cement and water. The sand/cement grout mix is a slurry of mostly sand with a small percentage of Portland cement and activators that after setup results in a material having the competency of a friable sandstone or mortar. Both grouting actions require tripping out the drilling tool, and then tripping in with an open-ended drill stem to apply or inject the grout mixes. The neat cement grout is highly reactive to the bentonite/water drilling fluid mix and is used during pilot phase drilling to stabilize the movement of fluids within the geologic formation where multiple fractures exist in relative proximity to each other in a stable geologic formation...”

And where, the author Greminger admits the following as an additional risk:

“Proactive Treatment by Annulus Grouting Generally the use of Loss Control Materials (LCMs) are less effective below 70 ft of the ground surface. The AP below that depth can exceed the effective stabilization capability of LCMs. Many of SPLP’s HDD profiles are below 70 ft of depth for the horizontal length of the profile. Accordingly, corrective action to address the presence of fractures or

unstable geology at greater depths below ground requires grouting of the HDD annulus” ...

THE CHALLENGE:

In our area, the “naturally occurring rock fractures” are the primary methods by which water naturally flows within our local neighborhoods to major and minor water tributaries, wells and other naturally occurring wetlands, and to which it has already been proven on a personal encounter that no one (not including Sunoco) can predict the impact of water flow as a result of any previous nor future digging) when “inadvertently” encountering rock fractures and it’s subsequent downstream impact on water flow, when disturbed.

Therefore a “fracture” is only considered an anomalous condition (in this Sunoco SPLP proposal scenario), when considering whether such digging can support the weight of a massive and un-natural pipe (destined to carry decidedly unnatural explosive materials) without any regard to the impact of the actual and naturally occurring flow of water that our neighborhoods, wells, livestock, and plants are dependent on. Fractures or the existence of them for our area, dictate how water flows in our area, so “plugging them up” when the impact would be unknown will absolutely result in un-natural and permanently altered natural water flow wherever such HDD drilling is done. This is not a maybe scenario, this is an absolute outcome. Maybe if we had a convenient above-ground (visible) river to watch how water flows, this would not be an issue. But we don’t. We have what is indigenous to this area in which water distribution is dependent on these “anomalous fractures” that have sustained our natural water flows within our neighborhoods for a long time.

The approach proposed is a little like saying (using a simple analogy of surgery in a human body) that SPLP proposes we to do “blind (unable to determine the nature of what you are digging around in until you stick the probe in)” experimental surgery, where we know nothing about where or the nature of the structure we are doing the surgery in (digging in this regard), with a simple minded approach to (paraphrased) “oh, and when we encounter a (hmmm, fracture or something else squishy we don’t know the nature or composition of, equivalent perhaps within a human body, to a vein or capillary or giant aorta using the surgery analogy) that gets in our way, we will “simply” fill the (fracture/vein/capillary/aorta) with cement (and other stuff that stops or plugs things up)”. Consider if a physician elected to do surgery with this approach (plug all things we don’t understand so we can put this un-natural object in your body. Whoops we inadvertently plugged up your aorta. Oh well, your problem not mine?

This particular fact was thrown back at me when my local pond went dry (and presumably, in order to force SPLP to the table) I would have had to scientifically prove some earlier digging that occurred by Sunoco impacted this random occurrence to which the geological consultant who reviewed my case suggested I would have to prove).

THE OBVIOUS WATER AFFECT AND IMPACT IN OUR AREA

Given that it is assumed that abrupt decreases of AP WILL be incurred (because rock fractures ARE the way water flows in this area – no other major methods), the proposed remedy when encountering this “weakness” is to “pump” various forms of slurry, concrete mix and sand to “stop” (one presumes) or “block” these naturally occurring weaknesses in the rock formations and naturally occurring fractures, that are in fact the way water flows through this region.

SO the question I return to SPLP (given I was offered the same scenario to try to defend my own position when my pond went dry from early SPLP digging - even though I was not the one digging in my own yard) – how will Sunoco “prove” (prior to digging anything) that the method it proposes to use to randomly fill that dumping slurry, cement, sand whenever the encounter the “perceived” weaknesses in the rock with their APM (by which the weakness or fractures in the rock currently provide the path for water flow in our area today) will NOT therefore affect nor alter (further) the existing water flow to our areas natural wells, ponds, streams and impact our livestock, lives, homes, naturally occurring water ways purely on water flow alone? (Notwithstanding the impact on water quality (assuming we still have it and it is not obstructed), the health of the water, and the contamination of of the water that feeds ourselves and livestock and plants).

The whole plan is deeply disturbing, unscientific, and not even remotely attempting to employ simple engineering standards or thoughtful environmental approach to risks/impacts. To purposely dig through an area where the known water flows utilize the rock fractures to move to its destinations with the sole purpose of laying unnatural large pipes without consideration or foreknowledge for the impact on geological, natural water flows when they are in fact undocumented or unknown (in an area where we are water dependent) is totally irresponsible behavior. Worst engineering plans I have ever encountered.

Engineers around the world should be appalled at this simple minded and plan (and this document has already been shared with the “best” in global construction businesses, with similar response as to the one I am providing) that has no consideration for the assumed impact on the water dependencies our neighborhoods depend on. Some simple, rudimentary considerations for the just the basics of water flow impact by a regulatory agency or by the entity given permission to do this work, is COMPLETELY absent in this proposal or in any plan, and is simply beyond irrational.

DEPA should be ashamed to consider and approve this approach as proposed in this supplemental explanation of the methodology. I hope that DEPA has enough backbone to at least request more a more detailed and thorough investigation (and study) of a more logical and balanced approach to purposely digging in water flow sensitive areas where are immediate neighborhood water systems are at risk. (9)
Letter – [Linda Yu](#)

6. Comment

On October 31, 2018, Sunoco submitted a supplemental letter to the Department in response to the Department's March 23, 2018 request for additional information regarding horizontal directional drilling (HDD) Site PA-DE-0046.0000-RD. My comments first address Sunoco's letter and then additional matters of importance, including some comments I made in my last response submission which appear to have been completely ignored. I was under the impression that the reason for this extremely short comment period was to give the residents impacted directly by Mariner East 2 the opportunity to voice their environmental concerns and highlight issues that the DEP may not be aware of that need to be addressed. In my case, several of these issues have not been addressed. It is the responsibility of the DEP to obtain these answers and to ensure SPLP comply with the DEP's requirements before issuing any permits.

1. Geophysics Analysis

Sunoco's previous stance that "geophysics will provide no functional information at this non-karst HDD location" was outrageous and incorrect. It is more than somewhat concerning that we have to insist on geophysical and geological surveys for HDD drilling along these HCA's. It is critical for mitigating failure and negative impact incidents. In view of previous HDD failures in this area (drill running off course in Edgmont Township and bore hole failure at Tunbridge Apartments in Middletown Township) I request that both the raw data and the expert analysis of the results (including any construction recommendations) be made available to the public with an opportunity to comment - especially the residents like myself whose property is 150 ft from the proposed HDD.

I note that the DEP previously requested that SPLP perform a series of downhole geophysics and caliper testing at this site. These are different survey techniques that provide different and more in-depth data to surface geophysics. The DEP needs to insist on these additional tests. Sunoco has not agreed to perform them and given no valid reason as to why they are not agreeing to this. For our safety and the safety of the environment, Sunoco must be required to conduct downhole testing.

2. Proactive Measures to Prevent Inadvertent Returns and Annulus Subsidence

All the proactive measures Sunoco mentions – APM, tool face pressure and tracking of cuttings removal – are standard operating procedures for HDD drilling, not additional preventive measures which have proved to be totally inadequate by themselves in preventing IR's or annulus subsidence as we know only too well. This therefore begs the question as to why Sunoco is even mentioning this in the Supplemental Information? The question the DEP should be asking is what additional proactive methods can be put into place to prevent IR's and annulus subsidence in the future?

3. Proactive Treatment by Annulus Grouting

Sunoco here mentions the use of 1) grouting using “neat cement”; and 2) grouting using a sand/cement mixture. However, Sunoco’s May 21, 2018, Response to Comments mentions “bentonite chips” for fractures. This is confusing. Which of these methods are to be used?

Additional Comments

4. Arsenic Contamination at Sleighton School

It recently came to my attention that the Sleighton School property and playing fields are contaminated with arsenic. The levels were very high. This can find its way into aquifers if paths are created with HDD drilling. Sunoco needs to provide testing of our private wells for this before and after drilling.

5. MBTE Contamination from Sunoco leak on Valley Road April 2015

In addition, the 12” Point Breeze to Montello leaked here on Valley Road in April 2015 contaminating the soil and wells with MBTE. There has been remediation but to reassure residents Sunoco needs to re-test wells and soil for MBTE, a carcinogenic. This could find its way into aquifers if paths are created with HDD drilling.

6. Private Water Well Protection Guarantee from Sunoco

Despite numerous comments by residents in the previous Reevaluation Report Responses, Sunoco has still not addressed this issue.

A temporary water supply via a “water buffalo” is totally out of the question for our property. There is no contract or agreement with Sunoco to protect the residents from shoddy work. The water buffaloes installed in Edgmont Township were installed by uncertified contractors. Contrary to what we were told by Percheron Field Services, Sunoco did not apply for the necessary permits. They did not furnish the Township with the necessary water tests. They did not have certified contractors reconnecting the wells.

The offer of a “temporary water supply” is, in itself, an indication that Sunoco expects private well water issues. We now also have proof of the damage this HDD drilling has done to residents’ water wells. As we already know, Sunoco has left numerous destroyed and contaminated private wells in its wake, as well as sink holes and flooding issues. If Sunoco is unable to furnish us with a guarantee that there will be no damage to our well then it must offer us a permanent solution in advance of any trouble, danger or inconvenience to our household. As another resident so clearly stated “Water well contamination and impairment is not a temporary matter that always resolves, leaving the supply owners free to start using their water supply good as new”. There can be long-term and irreparable damage to in-house filtration systems, domestic appliances, water quality, water flow and quantity. In our family’s case, from a medical health standpoint, any contamination could be life-threatening.

Putting us at this risk is totally unacceptable and we need the DEP to support and protect us on this.

The DEP asked Sunoco for “well depths, casing depths and water-level depths”. Sunoco claims to have done this but no water level survey seems to have been done. In the list of 32 private wells given in Attachment 1, 30 of them have a water level of “unknown”.

Sunoco cannot be allowed to destroy people’s sole water supplies. There is absolutely no guarantee of remediation by Sunoco in the event of any negative impact to our property or our well. I have spoken with my neighbors who have had to resort to hiring attorneys. The DEP should have the authority and the power to protect residents from damage and contamination to clean water supplies. This is a violation of our Rights under Article 1, Section 27 of the PA Constitution. The DEP needs to enforce that.

This is the 3rd time we have submitted comments regarding this issue. I would like to see this addressed in the response by the DEP to Sunoco’s letter. The DEP needs to require Sunoco to offer a permanent solution to any problems prior to the start of HDD.

7. Weld X-Ray Falsification Allegations

I understand there is a joint investigation into the alleged weld x-ray falsification allegations. I have requested details of this investigation via an FOIA Request from PHMSA. Until this matter is resolved, the DEP cannot allow Sunoco to commence with HDD.

8. Coating Flaws

Coating flaws were discovered on newly-installed sections of the ME2 20-inch pipe. Some of these sections have been excavated and have been replaced by new pipes. I am awaiting the details of this investigation via an FOIA Request from PHMSA. Until this matter is resolved, the DEP cannot allow Sunoco to commence with HDD. It is possible that the coating damage may have been caused by HDD installation.

9. Failure of Leak Detection Equipment to identify Leaks in Other Pipes

The residents in this area have already suffered the damage from a leak on Valley Road in April 2015. This went undetected for some time. The cause of the leak was galvanic corrosion. The leak was from the 12-inch Point Breeze to Montello pipe carrying gasoline. The pipe had been tested hydrostatically the previous year and had cathodic protection. Since this will now be part of Mariner East 2 and run alongside the 20-inch and 16-inch pipes, I am seriously concerned that this adds to the risk that my family and all the residents in the “buffer zone” are faced with. PHMSA advised against using these old pipes for HVL’s in guidelines it issued in September 2014. A totally different product than that intended for the pipe, at a much great pressure and

in reverse flow. We, the residents of Valley Road, would like to see the hydrostatic testing results for the 12-inch Point Breeze to Montello pipe.

My question is why should the leak detection equipment that hasn't worked for four other leaks in recent times, suddenly work now on the pipes they are proposing to install via HDD which is known to sometimes cause damage to coatings during installation?

10. Pipe Bending in the Field

An example of my concerns is PHMSA Case File CPF-1-2018-5002 and the Notice of Probable Violation and Proposed Compliance Order dated January 11, 2018 from Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. This occurred in Ohio during the week March 27-31, 2017. Sunoco failed to provide inspection that ensured that the installation of pipe or pipeline systems was in accordance with the requirements of Subpart D of part 195. Specifically, Sunoco failed to adequately inspect pipe bending during the ME2 project to ensure it was in accordance with Section 195.212(b). Several segments of pipe had severe coating damage and at least one joint of pipe had a gouge that extended into the wall of the pipe. Markings on the pipe identified the segments as having been subjected to field bending.

Therefore, Sunoco failed to provide adequate inspection of the field bending of pipe during the ME2 project to ensure compliance with Section 195.212(b). I would like to know what the results of this incident were and what precautions will be taken in the future to ensure that adequate inspection takes place and how that will be monitored and controlled.

11. Failure to Self-Report a Negative Impact Incident

There are numerous other incidents/events on Valley Road that compromised the safety of the residents or had a negative impact on the environment and our Wetlands. I have pictures of many of these. The conclusion from these incidents, violations and improper construction practices points to a total disregard for conditions and requirements set forth by all the regulatory agencies.

For example, on 9/9/18, on the property near the Wawa Wetlands, the barrier broke holding the IR which then flowed toward Rocky Run. A Percheron Field agent was notified at 9 a.m. By 3 p.m. still no action had been taken. There was heavy rain. A video of this was taken. I have a copy of that video.

The truth of the matter is that despite the \$12.6 million fine Sunoco received from the DEP for "willful and egregious violations", the company will continue to rampage through these densely populated areas with no regard for anyone or anything except getting the product through the pipes so the dollars can start rolling in. The fine should have been a warning to Sunoco that there are rules and regulations as well as restrictions to its construction practices. But Sunoco does not heed warnings or follow rules and regulations. And it does not self-report incidents. The DEP needs to

step in here if the residents along the path of Mariner East 2 are to be protected according to the DEP's mission statement – The Department of Environmental Protection's mission is 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.

Thank you for considering these comments. Please keep me apprised of your next steps on this HDD Site. (10)

7. Comment

I want to provide a public comment regarding the HDD drilling by Sunoco.

Watching Sunoco operate outside my kitchen door and in my neighborhood for the last 18 months, I am concerned in regards to their level of planning and care when operating. I have lived here for 10 years, and have noticed the following since they have prepared for HDD next to my property, made changes to a valve site in my development, and prepared for open trenching.

- Two sink holes opened up above the current 90 year old pipes, and were not addressed.
- EXTREME flooding that never occurred before has happened in various parts of the neighborhood, and as this was previously an orchard, there is a very real danger of chemicals moving from the areas they have disturbed (that were not touched by the developer) into areas where our children play.
- Their sound barriers were not even put up correctly, with pieces flying off and hitting houses – so how do we trust their operation methods?

Thank you in advance for addressing the danger they are bringing to my neighborhood. (11)

8. Comment

I am a homeowner in the very near vicinity of this proposed HDD site at Valley Road Crossing (S3-0591) DEP PERMIT # E23-524. I continue to have grave concerns with HDD drilling at this site due to the following factors:

1. This HDD proposed drilling area is in a very large wetland area. Any IR return of "industrial waste" would spread contamination to all wells and waterways in the area. This HDD site would greatly impact the ROCKY RUN stream which runs through the WAWA ROCKY RUN preserve area adjacent to drilling area. ALL homeowners in this drilling area are on private wells for water supply.
2. The geology of this area allows high risk for sinkholes due to "weak soil" regions etc. This shifting of the soil and changes in the soil erosion will place stress to current ME1 pipeline which is currently transporting the explosive NGL materials. We do not need a repeat of the sinkholes that occurred in West Whiteland to occur in this wetland area nor a catastrophic explosion from ME 1 pipeline.

3. Arsenic has been found at the site where HDD entrance point is and will contaminate our wells by pulling this from the subsurface area down to the aquifer system. Sunoco has not accounted for this cross contamination.
4. Once our wells are contaminated, there is no public water supply within the near area. What are the homeowners options???— to remain on “water buffalos” for permanent basis?

Sunoco has recommended numerous shortcuts to DEP requests, or ignored DEP requests outright. DEP must make Sunoco adhere to best practice procedures and not just the least expensive and most convenient for Sunoco!

The following should be insisted on by DEP before approving permits:

1. The DEP must insist on further geophysics testing in this area. Sunoco has only completed several core samples and says it does not need any more! Areas of fracture points and weak soil areas need to be determined due to the sensitive wetlands in area. The arsenic contamination must be accounted for and plans to keep this arsenic left untouched must be made available to the public.
2. The DEP should be notified of all critical phases of drilling in advance and be present with inspectors during these “critical periods”.
3. Sunoco states they will be monitoring our wells routinely. What does this mean routinely? One a week, bi monthly, monthly? Please demand a written time schedule.
4. A large percent of homeowners wells (30 people) have well depths and water level UNKNOWN. ALL wells should have water levels surveyed before starting drilling.
5. Sunoco has declined to grout 20 feet deep that DEP recommended. This should be insisted on instead of Sunoco’s proposed 15 feet of grout plug.
6. Sunoco should be required to use a casing (pipe liner) in the pilot hole at entry and exit points due to the severe threat of harming wetlands and wells. (12)