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May 20, 2021

Ms. Karyn Yordy
Executive Assistant, Office of Programs
Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Dear Ms. Yordy,

Please accept the following comments in response to the HDD Reevaluation Report submitted by Sunoco Pipeline, L.P. for DEP Permit number E15-862, HDD Reference number PA-CH-0199.0000.

Following my review of this report, I have a number of questions and concerns related to the stated environmental and quality of life impacts for citizens in Uwchlan and West Whiteland Township. Specifically, this report stated, *In general, the geologic survey results displayed anomalies along the alignment indicative of fractures that are possible locations for slightly-elevated subsidence and IR hazards.* For years, this drill site has caused undue and significant environmental harm to the local ecosystem. To think that the most recent effort to complete this section of the project will result in an alternative outcome is absurd and outright negligent. The provided geophysical survey highlights these risks and documents the very fact that any activity at this site will result in further environmental damage. As I have stated numerous times in the past, this project can not be completed without irreversible harmful impacts. I question the judgement of our state's environmental regulatory authority to permit the continued degradation of environmental conditions along the pipeline's profile. Further, I request that due to the unprecedented number of violations associated with this construction project, the department reject the most recent scheme as unsatisfactory. Simply put, there is no safe way to build a pipeline through a high consequence area without significant harm to the community, our shared drinking water resources, and our constitutionally protected environmental quality.

In addition to known and well documented environmental impacts to the local aquifer, water seepage north of the Shoen Road drill site has plagued this project since 2017. In fact, when drilling resumed at this location in August of last year, Sunoco reported a drastic change in the flow and quality of seep, leading to water testing required under the Seep Monitoring Work Plan. The re-evaluation report under consideration by the DEP indicates that while the groundwater was tested, Sunoco determined that based on a field test for pH, special conductance and color, there were no impacts from drilling fluid. This analysis conflicts with local reports and photographic evidence indicating an IR of drilling fluid may have occurred at this location. With this in mind, I question the decision to avoid formal laboratory testing of this groundwater for bentonite and other drilling contamination. Groundwater contamination caused by pipeline construction at this location flows east and deposits into a tributary of the Valley Creek, an Exceptional Value waterway and I question the ability for this plan to be successful without further contamination of this important water resource.

Compounding environmental and water quality issues, recent legal filings call into question the validity of any data presented to the department and believe it is in the best interest of all involved that additional and more extensive geophysical and hydrologic testing be performed at this site by an independent third party. After all, ground disturbance and earth movement are known to have resulted in the catastrophic failure of the Revolution Pipeline in Beaver County, Pennsylvania on September 10, 2018. If a similar pipeline explosion were to occur in the high consequence area of Southeast Pennsylvania, the resulting loss of life would be beyond tragic and gross negligence.

While Sunoco has gone through the motions of reevaluation, it is clear that the information provided will undoubtedly result in additional environmental harm. It is my strong recommendation that the Department reject this report as incomplete, call for significant public involvement including public meetings, and require Sunoco to perform a complete third party assessment of the entire project, across all 17 counties, to ensure construction activities do not cause permanent and irreparable harm to the environment and the Pennsylvania public. Otherwise, it is virtually impossible to determine if this pipeline is safe and stable. Failure to require additional oversight is nothing less than gross negligence and could result in catastrophic harm, similar if not worse that what occurred in Beaver County in 2018.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katie Muth', with a stylized flourish at the end.

Senator Katie Muth, SD44