

DEP Permit # E15-862
DEP Permit HDD Reference # PA-CH-0413.0000-RD
DEP HDD # S3-0520
Township – East Goshen
County - Chester
HDD Site Name – Strasburg Road / Bow Tree Drive Crossing

1st Public Comment Period

Commentator ID #	Name and Address	Affiliation
1	Kerry Marchetto	
2	Virginia Marcille - Kerslake	
3	Joan Herman	
4	Roberta and Edward Hunt 1124 Nottingham Drive West Chester, PA. 19380	
5	Joyce Tilli	
6	Ron Cocco	
7	Lex Pavlo	
8	Karen Parker-Masarone West Chester, PA	
9	Melissa Marshall, Esq. P.O. Box 408 1414-B Indian Creek Valley Road Melcroft, PA 15462	Mountain Watershed Association
10	Aaron J. Stemplewicz, Esq. 925 Canal Street 7 th Floor, Suite 3 Bristol, PA 19007	Delaware Riverkeeper Network
11	Joseph Otis Minott, Esq. 135 South 19 th Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
12	Alexander G. Bomstein, Esq. 135 South 19 th Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
13	Kathryn L. Urbanowicz, Esq. 135 South 19 th Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
14	George Alexander Media, PA	

1. Comment

As a private homeowner on North Chester Road in West Chester, PA, I am submitting my comments to PADEP as regards the Mariner East 2 pipeline.

I understand I may be hypocritical, or merely playing devil's advocate here as my husband and I did agree to the easement on our property pursuant to Sunoco running this line and we were paid for that right of way. In hindsight, I am regretful of the fact that we did sign on. In no small way, the construction activity on 352, the damage to peoples' homes, and the general unease that Sunoco has not done due diligence as evidenced by the violations they have been repeatedly cited for, has certainly given me concern.

In some measure, this brought a great deal of grief to my family and it is something I and my son are still trying to reconcile with.

With that said, I was happy to see the DEP suspend Sunoco's activities until they comply with requirements as outlined by DEP.

I suspect there was a lot of blame to go round. The East Goshen Board of Supervisors seemed rather lax and unresponsive from the onset of this project and only when Middletown Township began to push back did they seem to give equal time to the public response. However, homeowners like myself may have been complicit in that we did not respond more forcefully.

Ideally, I would prefer Mariner 2 was quashed altogether, but I'm certain Sunoco will prevail, given enough time

The East Goshen Board has proposed a legislative platform concerning any future pipeline activity in PA that would subject these industries to more oversight and greater legal and environmental accountability. I would like to think Harrisburg could look beyond the silver lining playbook they continue to see in the Marcellus Shale and begin to understand the real-time impact this is having on communities throughout PA. Extraction becomes an oxymoron when there is so much more being removed, and lost in this equation. (1)

2. Comment

Having Read Sunoco's HDD Re-Evaluation Report for the Strasburg Rd /Bow Tree Dr segment in East Goshen I have three key concerns:

1. Once again, Sunoco fails to give serious consideration to re-routing as required by the order.

2. As justification for its use of HDD as opposed to open trench, Sunoco acknowledges the surrounding infrastructure, utilities and residences. However Sunoco refuses to acknowledge the danger Mariner East presents to these same residents (and those within the larger evacuation zone) once the vast amounts of

ethane, butane and propane start flowing through their neighborhoods once Mariner East is completed.

3. In the report Sunoco acknowledges that ten private water wells in the vicinity will likely be contaminated by the HDD drilling. Sunoco claims that this contamination will not present a health risk. However, not knowing what will be picked up by their drilling fluids as they flow underground and eventually enter these wells, Sunoco cannot make that claim. Sunoco goes further and claims that this contamination will merely be "unsightly to users and affect taste". That was not the experience of the fifteen households in Marchwood in Uwchlan Township when Sunoco contaminated their wells in June 2017 on this project. People were temporarily put on bottled water and relocated to hotels and have had to switch to public water. It is concerning that not only does Sunoco downplay the consequence but is also very vague about what its response would be, going so far as to put the onus on residents to take precautions on their own: "... will encourage landowners to make advance arrangements for the supply of alternative water source as necessary during HDD."

It seems obvious to me that Sunoco should be required to go back and seriously consider, as ordered, where to locate Mariner East such that it does not present a danger to this densely populated segment. If HDD is to be allowed by the DEP through this segment, this allowance should come only AFTER Sunoco has reached written agreement with each of the ten property owners with private wells as to specifically how Sunoco will be compensating and assisting them in the event of any contamination of their well water during HDD drilling Vague promises and unsubstantiated claims are insufficient. (2)

3. Comment

Please we need your help. I have a well and I am worried about what will happen when SuNOco begins drilling. We cannot have our wells affected or the aquifer as it was affected in other area!!! Are you not concerned for all us homeowners who own wells. It isn't as simply as getting public water! They are ruining our water and our ground! Please, make them responsible and stop allowing them to do what they want!
(3)

4. Comment

We are completely opposed to the approval of the revised ME2 construction plans.

1. There is concern that there may have been political pressure from the Governor's Office for the DEP to fast track the original permits. If that is true, the public has been denied DEP's full expertise re this pipeline. Given appropriate time, DEP's answer may have been different in the beginning.

2. Using history as the best predictor of the future (which is all we can count on, given Sunoco Logistics' propensity to falsely advance their own interests), there is every reason to expect that well contamination will continue to be a problem. And, in SL's not-too-subtle admission of this, they are prepared with a remedy if anything

nasty happens. People in nearby communities have already signed such agreements after SL contaminated their wells; accepting the "pay off" included their agreement that they would take no further legal action against SL.

3. Understand, that we do not have any more than a lay person's understanding of this, but I am concerned with the recent (January 2018) very serious notice from the Federal Pipeline and Hazardous Materials Safety Administration regarding pipeline bending at a site in Ohio. Has SL responded to this? Once again, there is no reason for comfort that this has not, or will not, occur here. The failure of a bend can reportedly be catastrophic.

4. Governor Wolfe has not been responsive to the concerns of citizens along the route of this pipeline, even though one of his main responsibilities is the protection of our health and safety. We are sorry that this now falls to you. (4)

5. Comment

I live in Bow Tree and I am appalled at the disregard for our health and well-being that the pipeline is presenting. I have paid my mortgage and taxes to live in this area. They are destroying our environment and our way of life. This is inexcusable. (5)

6. Comment

Please be advised that I am a resident of Chester County and live along 352 in Bow Tree Farms.

I am dead set against Sun's recent revised plans along 352 in Chester County and along Valley Road in Delaware County.

As a long time Water Company retired employee I am extremely worried about the effect of private wells along these routes as well as the negative impact on the aquifers in these areas. Sun has not provided adequate data to support the impact of this drilling and recent contamination of wells proves that this is a very bad idea.

Construction should be permanently halted until an independent risk assessment has been performed to ensure our precious water resource is protected. (6)

7. Comment

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8. Comment

The Sunoco Mariner East project should not have any plans to proceed, alternative or otherwise before a complete risk assessment is conducted. The local citizens are working to raise our own funds for an unbiased and independent risk assessment. With all the documented problems with this project so far and the lack of PA laws enforcing safety and accountability, we need more common sense protections first, before attempting to streamline and expedite the permit process for these oil and gas companies. (8)

9. 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-CH-0413.0000-RD & PA-CH- 0413.0000-RD-16 (the “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 HDD 0413.0000-RD & PA-CH-0413.0000-RD-16

1. The risk to water supplies has not been adequately addressed.

As a threshold matter, Sunoco has not finished collecting data on well locations and features and should not be permitted to proceed with its plans until all this data is collected and analyzed. Sunoco explains that through contact with nearby landowners, it identified 10 wells within 450 feet of the proposed alignment. While the majority of wells in this area are served by public water, Sunoco has identified 13 parcels for which it lacks water supply data. These landowners must be reached, especially given the known risks to water supplies Sunoco describes in the Report. Even for the wells Sunoco has begun to document, it has not identified well production zones, as required by the Order, and thus cannot ensure their protection.

In its discussion of risks to water wells, Sunoco explains that drilling may “result in transport of diluted drilling fluids towards the withdrawn zone for individual wells.” Sunoco also incredibly claims that, “while this does not present a health hazard, it can be unsightly to users and could affect taste.” This sweeping claim is false. Bacterial contamination is known to result from drilling fluids or other sediment in drinking water. Water contamination from Sunoco’s HDD has already caused bacterial contamination in wells of residents in Exton, PA and in Berks County near the Joanna Road HDD Site.

Also concerning is that Sunoco seems to have arbitrarily decided that “active HDD activities could affect individual well use ... for wells located within 150 linear ft, on either side of the profile, and wells out to 175 ft ... along potential identified fracture zones....” Not only are these distance limitations (150 and 175 feet) unsupported by data, but, in respect to wells along the fracture lines, they contradict Sunoco’s own Hydrogeological Evaluation Report. Sunoco’s hydrogeologists recognize the potential for increased migration along fractures and recommend that

[p]roperties that lie beyond the 450-foot buffer and are in alignment with the mapped geologic structural features (fracture traces/zone, faults), intersecting water bodies, or other identified high-risk indicator for the incidence of IRs should be identified. The locations of these properties should be surveyed for information on water supply type.

Sunoco has ignored this recommendation and should be required to conduct surveying and well identification beyond the 450 foot radius in these areas of known vulnerability.

Despite the admitted risks to water supplies, Sunoco does not intend to change its plans so well contamination can be avoided, but rather “to encourage landowners to make advance arrangements for the supply of alternative water sources as necessary during the HDDs.” Residents nearby Sunoco’s operations should not bear the burden of dealing with the consequences resulting from illegal conduct such as Sunoco’s pollution of their wells. They are innocent bystanders. The Department has a legal obligation to not permit illegal pollution such as water well contamination, and may not approve construction techniques that are likely to result in such contamination.

2. Sunoco has not developed adequate plans to manage flooding.

The Hydrogeological Evaluation Report recommends that “drainage control and storm runoff management infrastructure in the areas of HDD entry/exit should be evaluated.” And specifically notes that “[p]rior operation experienced significant surface water flooding at the drill entry point following large rain events and snow melts.” It appears Sunoco has chosen not to follow the recommendation of its scientists. Sunoco should be required to provide a detailed plan for preventing and controlling flooding at the Site.

3. The Report has not fully addressed the risk of Inadvertent Returns.

This HDD alignment, as the Hydrogeological Evaluation Report makes clear, is crossed by several probable fracture lines and zones. These are features where groundwater may travel freely (leading to possible well contamination) and where IRs may find a path to the surface. Sunoco has not adequately addressed the increased risks presented by these fractures in its plans. In particular, the Hydrogeological Evaluation Report notes that some residences in this area are on septic systems and where these are near the HDD alignment, or “where fracture traces/zones connect the borehole to septic system locations, the risk of IRs is increased.” It does not appear Sunoco has even attempted to locate the septic systems near the alignment and nearby fractures. Sunoco has also not provided a plan for dealing with this specific increased risk or discussed the potentially serious consequences of connecting with a septic system. This is all critical information that Sunoco should be required to provide. The spills Sunoco reports in relation to the Site also seem to be incomplete. Sunoco mentions only “minor fluid losses and IRs occurred during the pilot hole of phase [sic] of the 20-inch pipeline. Two IRs of approximately 100 and 70 gallons were observed near the corner of Glenmont Lane and State Route 352...” But this ignores a significant IR in a residential yard on Gateswood Drive, just beyond the northern end of that drill, and on the other side of Rte 352.

This spill resulted in the coating of the side yard of a home in a layer of drilling mud (which Sunoco then covered with straw). The connectivity between the Gateswood Drive spill location and this site should be explored to ensure there is not a repeat spill.

4. More geotechnical study and analysis is needed.

Sunoco’s revised plan has its HDD path running deeper than its previous plan, presumably to drill through more solid bedrock in order to avoid groundwater and IR issues. But in fact, the reported borehole information show that the quality of rock actually declines below 90 feet. Especially given the highly variable integrity of the bedrock at the Site, it is important for the geologists who analyzed the HDD Site to weigh in also on whether and how the revisions to the design will adequately address the risks present from the original design. At this stage, that is not clear.

Sunoco claims that existing geophysical studies and one test boring at each end of the alignment are sufficient and that no further geophysical studies are needed. But the IRs that have already occurred during pilot-hole boring suggest that a better understanding of the local geology is required, especially in the areas of past IRs and probable fractures. The boring conducted so far shows potential problems. The nature and magnitude of the fracture lines and zones that appear to cross the alignment, identified from aerial photographs, has not been confirmed by boring or other means on the ground. The DEP should insist that new studies be completed before HDD resumes.

5. Sunoco's Alternatives Analysis is inadequate.

The Order requires Sunoco to consider alternative routes to the one initially proposed. In this case as in previous cases, they have failed to do so. Their verbiage asserting that “no practicable re-route options” exist apart from the current proposal is simply a reiteration of previous inadequate responses. For example, even a cursory examination of Google Earth satellite imagery shows that a far less populated route exists to the northeast. Sunoco recognizes that an alternative a mile to the northeast exists, but dismisses it because it would require “deviating from the current route...until an intersect is achieved” and then “deviate and return to the continued direction of the existing Mariner II route.” The DEP must insist that Sunoco do an actual evaluation of routes to either side of this area, with enough details to provide a basis for quantitative and qualitative comparison of the alternatives.

6. Sunoco should provide a traffic control plan.

The Hydrogeological Evaluation Report points out that Rte. 352 (which the alignment follows) has no off-shoulder walkways in this area, making it hard to conduct inspections safely along the right-of-way during drilling, and to respond to IR. Sunoco's hydrogeologist has thus recommended “an effective traffic control plan should be maintained.” Sunoco has not provided such a plan and must be required to do so.

Conclusion

For these reasons, Appellants request that the Department not approve the HDD re-evaluation recommendation without first (1) requiring that Sunoco gather the needed missing information, as outlined above, and (2) determining that, in light of the newly gathered information, HDD as suggested is appropriate at the HDD Site.

Thank you for considering these comments. Please keep us apprised of your next steps on this HDD Site. (9-13)

Letter – [Clean Air Council – 2-6-18 – Strasburg Road / Bow Tree Drive Crossing](#)

10. Comment

This is a comment on Sunoco's new plan for the Bowtree/Strasburg Road area.

1. Sunoco is required to consider alternative routes, and they brushed it off as "not practicable". It is obvious from Google Earth that there are far better alternatives, especially to the northeast, and Sunoco must be required to actually consider them.
2. Sunoco is required to consider alternatives to HDD. In this case, several stretches of conventional boring should have been considered. That would minimize risk to the water table and aquifers. Sunoco said HDD was needed because the alignment was too long for conventional boring. Of course it is too long for a single bore. Sunoco should have considered a series of conventional bores.
3. Sunoco failed to take into consideration the apparent fault lines and fault zones in the area. Sunoco's own scientists recommended going beyond 450 feet in its well analysis in areas where faults might provide a link a channel for water flow from the drill zone to wells. Instead, Sunoco decided arbitrarily, and without evidence, that 175 feet was sufficient.

The DEP needs to see that these issues are addressed before permitting more HDD in this area. (14)