



May 27, 2021

Department of Environmental Protection
Southeast Regional Office
Waterways and Wetlands Program
2 East Main St.
Norristown, PA 19401

re.: Chapter 102 ESG0100015001 & 105 E15-862 Permits

While many states have been faced with economic challenges over the past decade and a half, thanks to the development of the Marcellus and Utica shale formations, Pennsylvania has been given an economic lifeline that others could only dream of. Energy production is nothing new to Pennsylvania. We are home to the first ever oil strike at Titusville in western Pennsylvania, and many Pennsylvania families worked in some capacity in the coal industry at one time or another. Thanks to these industries, Pennsylvania has been a manufacturing powerhouse for more than a century. Those days had been waning in recent decades, but a resurgence is possible thanks to increased energy production.

Energy development in Pennsylvania is only as good as the infrastructure developed to safely deliver those products to consumers. Pipelines are the safest means to transport energy products, according to the U.S. Department of Transportation's (USDOT) Pipeline Hazardous Materials Safety Administration (PHMSA).¹ At this moment, Pennsylvania's pipeline infrastructure cannot adequately support the demand or potential supply, which is problematic for industries that rely on these products, consumers that need them to heat their homes, and especially for Pennsylvania residents in communities that could be negatively impacted through the use of less safe transportation means like railroads and trucks.

According to PHMSA, 750 tanker trucks or 75 2,000-barrel rail cars would be needed daily to fulfill the transport capacity of a "modest pipeline."² That is a lot more traffic on our roadways; and both options are less safe than pipelines. Opponents of pipeline infrastructure appear to believe that if they stop pipeline development, they will stop energy development. All they are really advocating for is increased rail and truck traffic through our communities and an increase in the likelihood of potential harm to the environment, local communities, and individuals.

Mariner East is critical to support Pennsylvania's natural gas liquids industry by transporting propane, ethane, and butane from western Pennsylvania to the Marcus Hook Industrial Complex in Delaware County. About half of all Pennsylvanians depend on natural gas for home heat, and many depend on propane specifically. Propane dealers appreciate the local source of propane for customers available at Marcus Hook.³ More than 1 million Pennsylvania residents have already benefitted from the ethane

¹ <https://www.phmsa.dot.gov/faqs/general-pipeline-faqs>

² <https://pipeline101.org/Why-Do-We-Need-Pipelines/Other-Means-Of-Transport>

³ <https://www.eia.gov/state/print.php?sid=PA>

supply that Mariner East is providing to the CPV Fairview electric facility in Cambria County. This is just the beginning.

As the Department of Environmental Protection stated previously: “the permits (for Mariner East) are among the most stringent the DEP has ever issued.”⁴ DEP has also executed strict oversight of the project since those permits were approved and construction began.

Infrastructure development is never pretty and Mariner East is no different. Realities gleaned from on-site work have determined that express approval of these modifications is needed to alter some construction techniques to ensure the safe installation of the pipeline. A shift from horizontal directional drilling to an open cut trench installation is necessary for the safety of the environment and will ensure swift construction to minimize the impact on local landowners during construction. These methods are among the industry’s best practices and should undoubtedly be approved in a timely fashion.

Mariner East is being built with American-made, union-produced steel and is being installed with the best trained, highly skilled union workers from Pennsylvania.⁵ These are people who live and are raising their families in the communities where Mariner East will operate. They are committed to getting the job done in the safest manner possible.

The Pennsylvania Energy Infrastructure Alliance is a coalition of local labor, economic development, conservation, and agricultural groups and individuals, committed to pipeline infrastructure development in the commonwealth.⁶ Our members understand the economic benefits this industry can provide every Pennsylvanian while also ensuring that our domestically produced energy resources are delivered to the end-consumer without incident, keeping our communities safe.

For these reasons, we ask the Pennsylvania Department of Environmental Protection to approve the Chapter 102 and 105 permit modifications for Mariner East. Your timely approval will ensure increased environmental safety of this project. Thank you.

SINCERELY,

A handwritten signature in black ink, appearing to read 'Kurt Knaus', followed by a long horizontal line extending to the right.

KURT KNAUS

Executive Director and Spokesperson
Pennsylvania Energy Infrastructure Alliance
300 N. Second St., Suite 702, Harrisburg, PA 17101
E: kurt@paallianceforenergy.com * P: 717-571-5687

⁴ <https://www.ahs.dep.pa.gov/NewsRoomPublic/articleviewer.aspx?id=21248&typeid=1>

⁵ <https://www.post-gazette.com/opinion/Op-Ed/2015/12/27/A-new-job-pipeline-for-steelworkers/stories/201512270029>

⁶ <https://paallianceforenergy.com/about/>