

DEP Permit # E15-862
DEP Permit HDD Reference # PA-CH-0199-000-RD
DEP HDD # S3-0360
Township – West Whiteland & Uwchlan
County - Chester
HDD Site Name – Biddle Drive Crossing

2nd Public Comment Period

Commentator ID #	Name and Address	Affiliation
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4	Jennifer Nichols	
5	Christian McFadden	
6	Meredith O’Neal	
7	Rachel Kelly	
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20	Joseph Mccullough 1854 Plymouth Dr Woodlyn, PA 19094	
21	Arianne Allan 12 Brookside Rd Wallingford, PA 19086	
22	Dale Harris 79 Ardmore Avenue Lansdowne, PA 19050	
23	Sue Morgan 3901 Franklin Court Chester Springs, PA 19425	
24	Eve Miari 407 Meetinghouse Lane Media, PA 19063	
25	Marilyn Maurer 538 Ballytore Rd Wynnewood, PA 19096	
26	Michael Babitch PO Box 1045 Kimberton, PA 19442	
27	Chara Armon 309 Dogwood Ln Wallingford, PA 19086	
28	Barry Cutler 115 Wyndmoor Rd Springfield, PA 19064	
29	Meta Neilson 77 Middle Rd Apt 263 Bryn Mawr, PA 19010	

30	Bob Steininger 100 Westridge Pl S Phoenixville, PA 19460	
31	Lani Frank 14 Meadow View Lane Malvern, PA 19355	
32	Donna Smith 1367 Harrington Rd Havertown, PA 19083	
33	Suzanne de Seife 514 Harrison St Ridley Park, PA 19078	
34	Lora Snyder 1443 Gradyville Rd Glen Mills, PA 19342	
35	Connor Young 364 Devon Dr Exton, PA 19341	
36	David Brittingham 5 Toms Circle Malvern, PA 19355	
37	Linda Beavers 536 Astor Square West Chester, PA 19380	
38	Linda Emory Healy 345 West Second Street Media, PA 19063	
39	Derek Zmuida 2 Adelpia Lane Chester Springs, PA 19425	
40	Suzanne Taylor 849 Durant Ct West Chester, PA 19380	
41	Janet Marchetti 411 Fairfax Drive Exton, PA 19341	
42	Courtney Prozeralik 610 N Plum Point Dr Exton, PA 19341	
43	Luke Bauerlein 364 Devon Dr Exton, PA 19341	
44	Brian Kerslake 103 Shoen Rd Exton, PA 19341	

45	Margaret Quinn 503 Carmarthen Drive Exton, PA. 19341	
46	Kecia Lee 1 School Lane Malvern, PA 19355	
47	Rachel Bright 161 Hillcrest Ave Phoenixville, PA 19460	
48	Jonathan Gostkowski 1219 New Hampshire Lane Downingtown, PA 19335	
49	Jim Castellan 1048 W Baltimore Pike Apt H510 Media, PA 19063	
50	Elizabeth Seltzer 2901 Burden Rd Brookhaven, PA 19015	
51	Pam Ungruhe 7 Judith Lynn Way Malvern, PA 19355	
52	Thomas Zane 107 Granite Ln. Chester Springs, PA 19425	
53	Gina Mulfinger 7202 Woodview Way Malvern, PA 19355	
54	Bea Quaintance 20 Line Rd Malvern, PA 19355	
55	Tim Hepp 105 Carters Grove Malvern, PA 19355	
56	Miriam Burstein 27 E. Central Paoli, PA 19301	
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59	Nancy Harkins 1521 Woodland Rd West Chester, PA 19382	
60	Lauren Cortesi 1 Rabbit Run Lane Glenmoore, PA 19343	
61	Jodie Brown 805 Queen Dr West Chester, PA 19380	
62	Jo Weiss 35 Northwoods Rd Radnor, PA 19087	
63	Sally Sims 1506 Conifer Dr West Chester, PA 19380	
64	Debi Norris 1520 Conestoga Rd Chester Springs, PA 19425	
65	Barbara Kontur 217 Richards Way Exton, PA 19341	
66	Sidne Baglini 203 Channing Ave Malvern, PA 19355	
67	Judi Anderson 111 Pontiac Way Gaithersburg, MD 20878	
68	Brian Noah	
69	Alexandra Manning 805 Graystone Lane Downingtown, PA 19335	
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72	Jessica Heichel 219 N Laurel Lane Exton, PA 19341	
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78	Zhanna Zhitomirsky 415 Chrislena Ln West Chester, PA 19380	
79	Roberta Lewis 1124 Nottingham Drive West Chester, PA 19380	
80	Theodore Strand 307 Horizon Ct Exton, PA 19341	
81	Nancy Krablin 433 Brookwood Dr. Downingtown, PA 19335	
82	Chris Digiulio 782 N Reeds Road Downingtown, PA 19335	
83	Carol Ann Roke 426 Vineyard Lane Downingtown, PA 19335	
84	John McGrath Exton, PA	
85	Chuck and Terry Mattioni 107 Shoen Road Exton, PA 19341	
86	Libby Madarasz	

1. Comment

Please do not approve new permits for this drill site for Mariner East. My community has been subjected to the unsafe drilling practices for just about 4 years now. This is eminent domain abuse. Private well water has been destroyed. Our aquifers have been contaminated. It's clear this company can not safely drill through this location, both for human and environmental safety. (1)

2. Comment

Isn't it common sense by now this crap is not needed or wanted? Stop this profit over people non-sense. Please. Do the right thing. (2)

3. Comment

As a 20+ year resident of West Whiteland Township, I'm writing to express my family's opposition to continuing with the doomed & failing Mariner pipeline project as it currently exists. Our family's reasons are many, but perhaps the most personally upsetting is watching my two teenagers. Both have done school research projects evaluating the need for this pipeline & the associated risks. Until then, they'd always ignored the occasional loud booming sounds. Now that they understand what those noises sometimes represent, I watch them flinch in fear. They want to move away from here so they don't feel constantly afraid of being blown to bits.

How am I, as a parent, supposed to calm their fears when I share them? I can't tell them about the excellent safety record - they know that's a lie. I can't say we need the fuel - we clearly don't. It makes me sick that this is even a question. Shut it down. For all our sakes. Please.

Consider this:

The Mariner pipeline, when completed, will consist of 3 distinct pipelines; the existing Mariner 1 and proposed 2, and 2x. Mariner 1 is an existing 8-inch line that was first installed in the 1930's to carry petroleum from Marcus Hook west to the Pittsburgh area. However, in 2014 it had its flow reversed and was converted to a high pressure NGL line, making Mariner 1 an un-assessed hazard and safety issue for Pennsylvanians for the last 3 years.

105,000 PA lives are in a blast zone, and since there is no color or odor to these gases, residents and first responders cannot depend on their senses.

There is no pipeline siting agency in PA. Therefore, it is being placed next to 40 schools putting thousands of our most vulnerable populations, our children, at risk.

Energy Transfer Partners is known for its frequent spills. The Dakota Access pipeline leaked at least five times in 2017. Energy Transfer Crude Oil pipeline, a natural gas pipeline converted to carry crude leaked at least three times in 2017.

Sunoco has the worst safety record in the industry.

The "cracking" process that converts the pipelines contents into plastic helps fuel carbon emissions adding to climate change.

Oil based plastics do not decompose. Instead, they fill our landfills and many times end up in our oceans and hurting our sea.

This pipeline is hurting our European neighbors as the communities near the Ineos cracking plants have safety and air quality concerns. (3)

4. Comment

I am writing regarding the proposed Sunoco permit for HDD-360. I urge you to not approve the permit until Sunoco addresses some major concerns.

- The current plan to resume drilling must address the areas of concern mentioned in geotechnical review of this area from February 2020
- Inadequate geotechnical testing has been done in this area. Boring that is actually along the HDD alignment and that is deep enough to draw legitimate conclusions must be done.
- How will the aquifer be protected
- How will they prevent frack-outs from the drilling
- How will they prevent new seeps

Please require that these issues are addressed prior to approving any permits. (4)

5. Comment

Please:

- Address the original areas of concern.
- Includes adequate geotechnical testing, with boring that is actually along the HDD alignment and that is deep enough to draw legitimate conclusions.
- Will ensure the aquifer will not be hit again.
- Will prevent frack-outs from the drilling.
- Will prevent new seeps. (5)

6. Comment

ET has drilled through an aquifer more than twice at the Devon to Shoen drill site, pumping away hundreds of thousands of gallons of water to maintain the integrity of their precious borehole. They have used these boreholes to lay hundreds of miles of pipe that has been left sitting in the sun for years, pipes which are designed to carry 1 billion water bottles' worth of Highly Volatile Organic Compounds for export to Scotland. Such Highly Volatile Organic Compounds are heavier than air and incredibly explosive, and they are being pumped through our communities and complexes, by our schools and nursing homes, all without our consent or benefit. Please put an end to this hazardous project, putting the health of our communities in harms way. (6)

7. Comment

I have a lot of issues with the ME2 pipeline and I've felt unheard and ignored for so long. There needs to be adequate geotechnical testing. Boring that's along with the HDD alignment and is deep enough to draw legitimate conclusions. The pipeline is not deep enough, anyone with eyes can see that. It's unsafe and could cause major harm to my community. Sunoco needs to be sure that they will not hit the aquifer

again, no new seeps, and prevent frack-outs from drilling. The library might have to move?

Let's be honest, this pipeline is not being built well. It's going to be carrying natural but dangerous liquids across very populated areas and could cause a huge explosion. This pipeline needs to be shut down and so does the frankenpipe, which the judge said needed to be shut down, but has it been. It's all so unsafe. (7)

8. Comment

I am writing to express my concerns over Sunoco's plans for the HDD 360 20" pipe installation, submitted to the Department of Environmental Protection for re-evaluation. I live directly across the road from the worksite on Shoen Road. I am acutely aware of what has occurred during this construction over the past four years, and have a Bachelor's degree in Earth Science and Master's degree in Soil Science.

In the previous public comment period, I and others drew attention to the need for further geotechnical investigations at the downstream (Shoen Road) end of HDD 360: Buried in Sunoco's HDD Reanalysis report for this restart was a February 27, 2020 report from Rettew recommending further investigation of three areas of concern that could potentially act as preferred pathways for water flow or contribute to possible earth subsidence's. These areas were marked as Areas A and B on the hillside on north side of Shoen Road, and Area C on the south lane of Shoen Road adjacent to the HDD drill site.

The documents submitted since then appear to be in response to this and they confirm the earlier areas of concern. However, the concerns are not resolved in the new reports; the geotechnical borings are inadequate and inconclusive; the reports contain erroneous statements; and they fail to correct problems from and during previous drilling at HDD 360. This is detailed below.

The repeat geophysical testing conducted on October 19, 2020 confirms the existence of Areas A, B and C and the proposed 20" passes through these areas of concern.

- Rettew states "these anomalies are roughly coincident with those detected in the previous [February 2020] geophysical study" (December 9, 2020, page 4) however the ovals appear to be significantly relocated without justification. In the photo below, Figure 7B (original geophysical survey) is on left and Figure 7A (repeat geophysical survey) is on right.
- Area A in Figure 7A (on right in photo below) excludes the fracture zone to the west.
- Area B in Figure 7A also excludes the gravity low to the west and fracture zone to the south.
- The proposed 20" path (grey line in 7A on right side in photo below) passes just west of Area A, along the western edge of Area B and through Area C. It passes through three possible fracture zones, one uphill from and behind our

neighbors' house at 109 Shoen Road, one at the bottom of the hillside on our property at 103 Shoen Road and one in between.

The borings on the hillside in the Areas of Concern A and B are insufficient and inconclusive.

- Only two borings were conducted on the hillside: S3_0360_AP_A1 in Area A and S3_0360_A1 in Area B. The borings only went to depths of 28.8 feet and 11 feet respectively. (PSI, January 11, 2021).
- Rettew's only conclusion from the borings is a vague possible explanation for the gravity anomaly in Area A (February 18, 2021 page 2).
- Having no conclusion from the boring in Area B, Rettew suggests an "elevated sand mound septic system" on the hillside "may be the source of the gravity anomaly" (February 18, 2021 page 2). However, no such septic system exists at that location nor anywhere on the hillside, nor has one ever existed according to my neighbor Chuck Mattioni who has lived on the hillside for over thirty years and who built his home at 107 Shoen Road and the Wardles' (109 Shoen Road) downhill.
- As stated in the PSI report "The strata shown on the logs represent the conditions only at the actual boring locations. Variations may occur and should be expected between boring locations". Not only were there merely two borings on the hillside, they weren't even conducted on the proposed path of the 20". (The location of the borings is marked in light blue and the proposed 20" in grey on the figure on right side of photo above)

Contrary to Rettew's claims, it remains unknown whether or not Area C is underlain by karst.

- The two borings (360A and 360B) in Area C only went to a depth of 30 feet and 31 feet and did not hit bedrock (PSI report June 22, 2020).
- A shallow trench was excavated across Shoen Road in June 2020 to install a mitigation system for potential IR's at the seep on the north side of the road. This trench was only a few feet deep. It did not hit bedrock.
- As noted on page 5 of the December 9, 2020 Rettew report, boring OW-1 on the HDD360 drill site in 2017 encountered karst. According to the boring logs in Attachment B of the October 2020 Reanalysis Report, this occurred at a depth of 60 feet.
- Rettew uses borings 360A and 360B and the shallow trench to claim Area C is not underlain by karst bedrock (Rettew report December 9, 2020 page 5), however none of these reached bedrock or came anywhere close to the depth where karst was encountered at the nearby OW-1 boring.

The Rettew Reports contain several erroneous statements

- Rettew inflates the geotechnical borings in the geophysical survey area when it lists eleven "borings completed at the site to date" (February 18, 2021, table on page 1). Three of them (B6-9E, S3-0360_SB-01 and -02) are from other parts of HDD360 and one is from an entirely different HDD (S3-0350_SB-04).

- Rettew claims “the karst [encountered on the drill site in boring OW-1] does not extend to the HDD entry/exit” (February 18, 2020, page 5). However according to the September 1, 2017 Hydrogeological Investigation report, “boring [B6-4W] near the south entry/exit pit was most likely in karst as the boring went 130 feet before encountering bedrock”, and “the geological structure in this area is complex and the location of the contacts, as shown on geological mapping may lack structure” (page 2)
- Rettew further claims that karst does not extend anywhere along the HDD path (February 18, 2021, page 5) but that claim is baseless because, as previously explained, the two borings and the trenching on Shoen road were only 30 and a few feet deep respectively and did not hit bedrock.
- Rettew revised the contact between the Ledger (karst) and Harper formations mapped by the PA Geological Survey (December 9, 2020, Appendix C), incorrectly putting the HDD entry/exit pit and Shoen Road in the Harpers Formation. As stated above, boring B6-4W confirmed that the entry/exit pit is most likely in karst and the borings and trench on Shoen Road were too shallow to determine the underlying geology. The location of the contact north of the entry/exit remains uncertain.
- Rettew refers to the seep on the north side of Shoen Road as “a natural, pre-HDD seep” (December 9, 2020, page 2). It has already been well-established, including by Sunoco, that the seep is the result of Mariner East drilling activities and began in July 2017 immediately after the pilot hole was grouted.

Sunoco is proposing to HDD drill at a site that has experienced inadvertent returns of drilling mud and grout, seep formation and a subsidence feature. Geotechnical borings on Shoen Road and the hillside were insufficient to remove the concerns for more subsidence, IR’s and seeps. These concerns are on four private properties and a busy township road with HVLs being transported a mere few feet underground through two pipelines (ME1 and the 12”) in a High Consequence Area. The proposed 20” passes through these areas of concern.

Further work is needed to address these concerns and those previously submitted.

It is clear from the reports introduced since the October public comment period, that the DEP must require further geotechnical borings in all three areas of concern and reports submitted to the DEP for this reevaluation. The borings need to be deep enough to be conclusive; on the 20” path; and sufficient in number.

In addition to the geotechnical borings, concerns raised in the October public comments have yet to be addressed. From my comments alone these include:

- The DEP must require Sunoco to submit a plan to ensure drilling the 20” will not impact the aquifer again, discharging large amounts of groundwater (over 250,000 gallons per day) into the borehole and having it hauled away as industrial waste.
- The DEP must require Sunoco to submit a plan to better contain inadvertent returns at this site, as well as avoiding them altogether.

- The DEP must require Sunoco to stop the seeps their drilling activities created at Shoen Road. Extensive grouting of the 16” pipeline’s annulus did not achieve this as Sunoco had previously predicted.
- Ensure drilling the 20” does not create seeps on other homeowners’ property.

Of final note, when the owner of the West Whiteland apartment complex on the south side of Shoen Road extended its temporary easement with Sunoco for another twelve months (with the option of an additional twelve months) on September 24, 2020 (for \$900,000) it required specific amendments to Sunoco’s indemnity obligations, such that Sunoco will defend and hold harmless the owner West Whiteland Apartments from all claims etc. including death, damage to neighboring property and lands, environmental contamination, clean-up of hazardous materials, etc. It specifically includes leaking of drilling fluid and investigations by the PA DEP. These amendments are clearly in response to what has transpired at that site and on the north side of Shoen Road since Mariner East HDD construction began here in June 2017. Sunoco has submitted no plans to ensure such impacts to the environment and neighboring properties do not occur when constructing the 20”.

A public meeting on this re-evaluation is requested. (8)

Letter - [Virginia Marcille-Kerslake](#)

Attachment - [Virginia Marcille-Kerslake pictures](#)

9. Comment

First, I want to thank the DEP for the Alternative Fuel Incentive Grants. Citizens see that you are investing in projects that will increase our air quality. Residents of Pennsylvania are also concerned about water quality and the impact of pollution on all our residents. A recent Environmental Health Network report proved the negative public health impact of fracking. <https://www.ehn.org/fractured-fracking-study-politician-response-2652884417.html>. Groundwater seepages from the Mariner East 2 Pipeline contain the same toxins.

Sunoco gladly pays fines imposed for environmental spills, because they look at it as a business expense. They have deep pockets and seem to consider groundwater seepage a normal occurrence. The recent Marsh Creek spill is also an example of how Sunoco is harming our environment and public health. What about the toll on innocent citizens? In the EHN study, all people tested had way over the recommended body burden for toxins. One child had 91% over the maximum allowable levels. What if that were your child? How does the money that Sunoco pays in fines, actually alleviate the damage caused by the spills.

Please stop this madness. Why issue more permits to Sunoco, since they continue to violate environmental standards. They make a mockery of the environmental standards that you have put in place. The Mariner East 2 Pipeline has no real provisions for containing further groundwater seepage. They will continue to harm Pennsylvania citizens if you don’t stop them.

Please consider that no amount of money can alleviate the public health issues caused by toxic chemical seepage/spills. Please Protect Us. (9)

10. Comment

Please find attached joint comments on HDD 360, crossing PA-CH-0199.0000-RD. Please let me know if you have any questions.

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 the supplemental materials provided by Sunoco Pipeline L.P.’s (“Sunoco”) on its re-evaluation report (“Report”) for the horizontal directional drilling (“HDD”) indicated by drawing number PA-CH-0199.0000-RD (the “HDD Site”).

First, Appellants reiterate their previous comments on this HDD proposal concerning the possible corruption of the science presented as fact by Sunoco around the HDD operations in Chester and Delaware Counties and incorporate them by reference herein. Until the Department is able to ensure the proposal for this HDD Site is grounded in thorough scientific analysis, which is based on complete and accurate data, it is the Department’s duty not to issue an approval for this HDD proposal. Appellants’ additional comments are as follows:

1. The comment period should be extended because the geophysical report is largely incomplete.

The Rettew geophysical survey refers to a series of “enclosed” Figures 1, 2, 3A, 3B, 4, 5, 6, 7A, and 7B, and Appendices A, B, and C. The figures are not enclosed or otherwise available, and the Appendices were just made available as of this writing. The narrative summary is impossible to fully and meaningfully evaluate without the information presented in the figures and appendices. The Department should extend the comment period beyond May 20, 2021, as these vital documents have not yet been made available, and/or were just made available.

2. The newly available reports appear to be later versions of reports the public should have had access to originally.

Curiously, several of the newly-available documents contain stamps re-dating them. Rettew’s geophysical survey report states that it was “PG Sealed” April 16, 2021, and its geotechnical support was “PG Sealed” April 20, 2021. The Intertek PSI reports were “re-issued” April 20, 2021. The public should have access to the original reports submitted to the Department, not just new versions of the reports. If Sunoco submitted earlier reports that the Department deems to be inaccurate, unverified, or insufficient, there is no reason that they should be shielded from public scrutiny. The Department should make these documents available and ensure that the public has time to review and comment on these materials before closing the comment period.

3. Several serious problems remain with the boring and surveying at the HDD Site.

Appellants incorporate by reference the comments of Virginia Marcille-Kerslake on the HDD Site. Ms. Marcille-Kerslake is a resident in the neighborhood who Sunoco has harmed repeatedly and extensively over several years, and who is a soil scientist who has identified major problems in Sunoco's investigation at the Site. In particular, she points out the areas of concern that the investigation identified but did not resolve. The investigation contains contradictory information about what lies below the proposed drill path and suggests that there may be karst along the path but lacks enough information to adequately resolve the concerns.

Ms. Marcille-Kerslake identifies specific needs for the investigation. Appellants agree and urge the Department to require Sunoco to proceed as specified in her comments.

4. The geophysical surveying Rettew conducted should have been more extensive.

The new information provided to supplement the Report includes a Rettew geophysical survey report and a follow-up geotechnical report. The survey report includes in the "Site Description" section the note that "A geophysical survey was conducted over accessible areas of the HDD exit/entry locations (Figure 2). The actual exit/entry areas were inaccessible due to wooden and plastic matting in the east, and inaccessible to ERI surveying in the west." Sunoco can remove the wooden and plastic matting that it put down in the first place; that is no excuse for shortchanging its surveying operation. The claimed inaccessibility in the western end is simply unexplained. The Department should require a complete survey, not one limited by Sunoco's lack of interest in moving a mat it placed down.

5. Sunoco mischaracterizes the extent of karst.

After reporting that "[t]he actual exit/entry areas were inaccessible," Rettew then concludes that "the karst does not extend to the HDD entry/exit or anywhere along the path." Rettew cannot know that, as it just admitted it did not survey the HDD exit and entry areas. Of course, Rettew has a motive to describe the area of karst as less extensive than it actually is, in order to let the Department's guard down and make a quick approval of the HDD plan more likely. This contradiction should lead the Department to scrutinize the veracity of the rest of the Rettew report, which should already be under scrutiny due to the whistleblower's revelation of falsified science.

6. The new materials do nothing to alleviate concerns about the seep.

As explained in earlier comments regarding this HDD Site, Sunoco's drilling has caused drainage of the aquifer underlying the neighborhood, which not only depletes

fresh groundwater, but also results in localized flooding. Nowhere does Sunoco articulate a plan that would stop new drilling from exacerbating this problem. This is unacceptable. The Department should not greenlight a plan that would flood neighbors' properties.

Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site. (10-14)

Letter – [Clean Air Council](#)

11. Comment

I am writing to comment on Sunoco's New Plan to Resume Drilling at Shoen Road, in Exton PA.

My request: Please do not issue a permit for HDD-360 (which Sunoco is now calling "Biddle Drive").

Background:

Drilling at Shoen Road originally began in June 2017 and was abandoned when the aquifer was hit and huge amounts of fresh water began to flood downhill, swamping the drill site. The hole was grouted (plugged) and drilling was halted. Many residents uphill from the drill who had private wells lost their water. Sunoco starting drilling again on October 9, 2019, but that attempt was soon abandoned. On October 17, they once again hit the aquifer and had to stop because a local residential well was threatened.

In early August, Sunoco resumed HDD (horizontal drilling) for the Mariner East pipeline at the Shoen Road drill site in Exton, PA. But again, it did not go well. Soon, Sunoco was arranging for huge tank trailers to be brought in so that the water that was pumped out of the drill pit could be carried away. One estimate is that 250,000 gallons a day were being carted off in this way (50 trucks a day at 5,000 gallons each)!!

On August 10, 2020 the drilling rig was shut down.

Now, Sunoco is submitting a plan to resume drilling at Shoen Road. Unfortunately, the plan is full of errors, misleading statements, and modified geological information, and it fails to correct the problems that occurred during the previous HDD drilling at this site.

The DEP must require that Sunoco submit a new plan that:

- Addresses the original areas of concern, not the bogus ones in Sunoco's new restart report.
- Includes adequate geotechnical testing, with boring that is actually along the HDD alignment and that is deep enough to draw legitimate conclusions.
- Will ensure the aquifer will not be hit again.
- Will prevent frack-outs from the drilling.

- Will prevent new seeps.

In summary, please do not issue a permit for HDD-360 (which Sunoco is now calling “Biddle Drive”) until these above issues are resolved and the public has a chance to comment on Sunoco’s response.

PS. I actually live in Delaware, but I care about the Sunoco pipeline and what happens with it, since I know many people who live right next to it, and I end up driving right by it, in my local travels. I also live only 5 miles from the endpoint of the Mariner East pipeline, in Marcus Hook, Pennsylvania. Should there be an explosion at Marcus Hook, my house in Arden, DE would be in the "evacuation zone", described by Sunoco as 3-5 miles from the “blast zone”. [Claymont, DE would be in the blast zone]. It is high time this pipeline be shut down, because of gross negligence on the part of Sunoco, and hundreds of the company’s brazen infractions, for many years now. Thousands of lives are endangered every single day because of the existence of this pipeline. Thank you for considering my views. (15)

12. Comment

I find Sunoco's plan to resume drilling at Shoen Rd. to be inadequate. Please insist that Sunoco file a new plan that: a) addresses the original areas of concern, (not the bogus ones in their restart report!); b) that it includes adequate geotechnical testing; c) ensures that they won't hit the aquifer again; d) will prevent frack-outs; and e) prevents new seeps from drilling.

Please don't issue a permit for HDD 360 (Biddle Dr.) until these issues are resolved and the public can comment on Sunoco's response! (16)

13. Comment

I am very concerned about Sunoco’s plans for the HDD 360 20” pipe installation, submitted to DEP for re-evaluation.

The comment period should be extended because the geophysical report is largely incomplete. The Rettew geophysical survey refers to a series of “enclosed” figures which are not enclosed or otherwise available. The DEP should extend the comment period beyond May 20, 2021, so that the public has time to review and comment on these materials before closing the comment period.

Serious problems remain with the boring and surveying at the HDD Site. Sunoco is proposing to do HDD at a site that has experienced inadvertent returns of drilling mud and grout, seep formation and a subsidence feature. Sunoco’s investigation identified numerous areas of concern that have not yet been resolved and offered no viable plan for preventing further occurrences.

Sunoco mischaracterized the extent of karst. The investigation contains contradictory information about what lies below the proposed drill path and suggests that there may be karst along the path but lacks enough information to adequately resolve the

concerns. The DEP should scrutinize this section of the report, as well as the veracity of the entire Rettew report.

The new materials do nothing to alleviate concerns about the seep. Sunoco's drilling has caused drainage of the aquifer underlying the neighborhood, which not only depletes fresh groundwater, but also results in localized flooding. Nowhere does Sunoco articulate a plan that would stop new drilling from exacerbating this problem. This is unacceptable -- the DEP should not greenlight a plan that would flood neighbors' properties.

DEP must require further geotechnical borings in all three areas of concern in the reports Sunoco submitted to the DEP for this reevaluation. The borings need to be deep enough to be conclusive, on the 20" path, and sufficient in number.

Sunoco also failed to address concerns raised in the October public comment period. These include:

- The DEP must require Sunoco to submit a plan to ensure drilling the 20" will not impact the aquifer again. Previous construction at this site resulted in Sunoco discharging large amounts of groundwater (over 250,000 gallons per day) into the borehole and having it hauled away as industrial waste.
- The DEP must require Sunoco to submit a plan to better contain inadvertent returns at this site, as well as avoiding them altogether.
- The DEP must require Sunoco to stop the seeps from its drilling activities created at Shoen Road. Extensive grouting around the 16" pipeline did not achieve this as Sunoco had previously predicted.
- Ensure drilling the 20" does not create seeps on other homeowners' properties.

I request a public meeting and hearing on this re-evaluation.

DEP should not make a decision about a permit for HDD-360 until these issues are fully resolved and the public has a chance to see all of the report and comment on Sunoco's response. (1, 8, 17 – 70, 72, 73, 76, 78 - 83)

14. Comment

Do not issue a permit for HDD-360 (which Sunoco is now calling "Biddle Drive") until these issues are resolved

The DEP must insist that Sunoco submit a new plan that addresses these issues:

- Address the original areas of concern, not the fake ones in Sunoco's new restart report.
- Includes adequate geotechnical testing, with boring that is actually along the HDD alignment and that is deep enough to draw legitimate conclusions.
- Ensure the aquifer will not be hit again!
- Must prevent frack-outs from the drilling.
- Must prevent new seeps. (45)

15. Comment

Sunoco's plan regarding application for a permit for HDD-360 ("Biddle Drive") is full of errors, contains misleading statements and modified geological information, and fails to correct the problems that occurred during the previous HDD drilling at this site.

I am urging DEP to insist that Sunoco submit a new plan that:

- Addresses the original areas of concern, not the bogus ones in Sunoco's new restart report.
- Includes adequate geotechnical testing, with boring that is actually along the HDD alignment and that is deep enough to draw legitimate conclusions.
- Ensures the aquifer will not be hit again.
- Prevents frack-outs from the drilling.
- Prevents new seeps.

No permit for HDD-360 ("Biddle Drive") should be issued unless or until these issues have been resolved and the public has a chance to comment on Sunoco's response. Thank you in advance for your time and consideration. (71)

16. Comment

Sunoco's plan to resume HDD work at Shoen Road (HDD-360) is badly flawed. The company should not be allowed to resume until it has addressed these questions:

- Why did the "areas of concern" in the original geological assessment get arbitrarily moved to new locations, with no justification?
- Why didn't the test boring take place along the actual proposed route of the pipeline? How can such off-line boring be used to draw conclusions?
- Why did Sunoco not address the problems that will occur if it again hits an aquifer (likely, given the location and path)?
- How will Sunoco prevent inadvertent returns when it drills this time?
- How will new seeps (like those created by the previous boring) be prevented?

The geological analysis that has been done for this application is seriously inadequate. The DEP must insist on a proper analysis, accompanied by a realistic plan to head off the problems listed above. (72)

17. Comment

Regarding HDD 360 (Biddle Drive) No Permit should be issued until the DEP has adequate answers.

The DEP should demand clarification of the many issues that are unacceptable in the 're start' plan by Sunoco/ET for the Shoen Road /Biddle Drive drill site.

Once again, the public is left with more questions than answers – and mired in confusion. How is it possible for the DEP to accept a plan that varies from the actual

geology? How can the DEP accept a plan than does not correspond with previous geological descriptions?

There are blatant discrepancies in the report by Rettew, who writes the new test boreholes were 30 feet deep and finds “No Karst along the path of the HDD path”. However, karst is known to exist from 60 -120 feet deep. So, the claim made by Rettew that there is No Karst along the path of the HDD path is baseless and this issue should be further investigated.

Rettew also seems to have Moved the ‘areas of concern’ in his report. Another error? or a misleading statement? How can this be taken as a serious and legitimate report?

The proposed plan makes No accommodation for solving issues related to hitting an aquifer which happened the last time. This is simply not acceptable. The last attempt resulted in destroying many millions of gallons of pristine water. This omission alone should be unacceptable to the DEP.

The careless disregard for destroying groundwater resulted last time in Sunoco pouring untold amounts of grout into the ground. Subsequently, new springs have resulted along the path and this report offers no response to the possible negative impacts of redirecting groundwater long term. It offers no information as to how this grout has or could affect local wells on private property, including seeps on adjacent property. The DEP has an obligation to the public to know how this project will affect water long term.

As a citizen of PA, I fully expect a report to the DEP to address what are the actual areas of concern, and that the DEP does not allow this deficient report to be accepted until and unless it fully addresses.

- 1) The original areas of concern.
- 2) Adequate professional, non-biased geological testing along the actual path and dept of the proposed HDD.
- 3) A way to prevent more damage to the aquifer and new seeps.
- 4) Drilling that will not include Frack outs.

Your job is not about helping any project to be completed! It is supposed to protect and defend Pennsylvanians’ constitutional environmental rights. (74)

18. Comment

I am writing to express my concerns regarding Sunoco Pipeline’s request for reevaluation of plans to install a 20-inch pipeline via horizontal direct drilling (HDD) under Biddle Drive, Devon Drive, Valleyview Drive and Shoen Road in Uwchlan and West Whiteland Townships.

As state Senator representing Pennsylvania’s 19th Senatorial District and minority chair of the Senate Environmental Resources and Energy Committee, I have

significant concerns about the potential for this project's substantial and ongoing impacts to environmental safety and public health.

Please keep in mind that in the past, drilling through this same area has encountered geological issues, leading to groundwater discharge and impacts to private and residential wells. In turn, any plans to employ HDD here require and demand thorough, comprehensive, and in-depth geological analysis to prevent harm to our natural environment, local infrastructure, community health, and public and private water supplies.

Specifically, I am alarmed by points raised by my constituents, including local resident and soil scientist, Virginia Marcille-Kerslake. Marcille-Kerslake, who is well-versed on this pipeline project having had its operations negatively impact her property over the years, raises valid concerns regarding the lack of detail and depth in the geophysical survey submitted by Sunoco. She notes multiple inadequacies in the survey – shortfalls that have the potential for major problems, including the potential for groundwater discharge, inadvertent returns, seeps, subsidence, and other geological issues impacting both public and private property.

While Sunoco routinely reminds residents and homeowners that the Mariner East project is nearing conclusion, it must be noted that each reevaluation and permit modification request reminds my constituents of the litany of problems this project has thrust upon their lives, homes, neighborhoods, and communities. It also warns us of the potential for more to come, especially when Sunoco appears to come up short in conducting extensive and diligent geophysical surveys and analysis.

In closing, Sunoco must conduct further geotechnical analysis and submit detailed plans to ensure that its operations do not impact the environment and our communities. I respectfully request that such study be required, and public comment be extended to ensure that residents and homeowners continue to have an opportunity to weigh in on this all-important issue. Until that happens, I encourage the Department of Environmental Protection to reject this report as insufficient and incomplete. (75)

Letter – [Senator Carolyn T. Comitta](#)

19. Comment

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 than what occurred in Beaver County in 2018. (77)

Letter – [Senator Katie Muth](#)

20. Comment

I am very concerned with the numerous problems inflicted upon the residence of Chester County by Sunoco / ETP's construction of the Mariner East hazardous liquid pipeline.

We have seen numerous aquifers compromised in Chester County and even a sizeable spill in a major reservoir at Marsh Creek.

At Shoen Rd. in West Whiteland, a Sunoco report from February 2020 shows areas of concern which in later reports Sunoco moved. This needs to be looked into.

They have shown poor geological surveying thus far on this project. I would insist on proper geotechnical testing along the actual HDD path and similar depth, and not one more convenient for their tests and perhaps desired results.

I would like a comprehensive plan designed by qualified engineers to ensure no more aquifer damage & pollution, and no more frac outs.

What is their plan for the seeps caused by their grouting of the compromised aquifer? Future seeps?

I would like to see them held accountable for the wells of those damaged by their project even if 1,000 feet away as seems to be the case with the Glenn Mills family that has been in the news (<https://philadelphia.cbslocal.com/2021/05/05/erica-tarr-john-tarr-mariner-east-pipeline-dirty-water/>).

Our water is such a precious resource that it must be better protected. Fines need to be far steeper so as to serve as a deterrent. Fines are just a pittance and part of doing business for them it seems.

Hopefully you are still reading. This whole project stinks of corruption and it needs to end. While pipelines may be safer than transport by train, or truck, but they do facilitate the possibility of disaster on a much larger scale. This transmission pipeline project, with a capability of half a million barrels of ethane a day, will run through heavy populated areas within feet of homes, schools, parks, and under swing sets and trampolines. You read stories of pipeline failures, invariably in farmers' fields, where fires rage and homes 1,000 feet away are damaged. This pipeline will run through a narrow 50' wide corridor alongside two 80-year old pipelines. Failure in one will surely cascade since no safety measures such as double walled pipes or blast protection are to be used to protect adjacent pipes. When a pipeline such as this fails

in a "High Consequence Area" as PHMSA puts it, the consequences can only be high. I hope those who were cavalier in putting this through backyards face negligent homicide charges in the event of any failure resulting in death. Failure is only an accident when all reasonable safety precautions are taken. Sadly, the Sunoco actuaries have determined that in the event of a disaster, my life, your life, and those of our neighbors are cheaper than building fault tolerant and safe infrastructure. (84)

21. Comment

We reside at 107 Shoen Road, Exton PA 19341. We have lived here 40 some years. In all of that time, never has water seeped from this hillside until the work started on the new pipelines. To express our concerns, we ask all involved to make certain that the aquafier is not compromised. (85)

22. Comment

I am writing to request that the DEP require Sunoco to do a more thorough geotechnical investigation and provide a plan to prevent the reoccurrence of previous drilling mishaps and violations before approving HDD drilling for Mariner East 2 from Shoen Rd to Devon Drive. Sunoco is proposing to do HDD at a site that has experienced inadvertent returns of drilling mud, seep formation and a subsidence feature. Sunoco's investigation identified problems that have not yet been resolved. Plans which showed areas of concern have been revised so that those sensitive areas have been removed without explanation. Geological testing has been inadequate. Core samples were taken at a much shallower depth than the HDD will occur. Sunoco's repeated mistakes in Chester County, and especially on Shoen Rd, have diminished any confidence that they are thoroughly prepared to tackle this area. Residents of West Whiteland Township are relying on the DEP to protect our assets and keep us safe. (86)