

Rosemary Fuller
226 Valley Road
Media, PA 19063

September 22, 2019

Mr. John F. Hohenstein P.E Environmental Program Manager
Southeast Regional Office
Pennsylvania Department of Environmental Protection;
2 East Main Street Norristown,
Pennsylvania 19401-4915

Re: Response to DEP Comments for Hydrogeological HDD Re-Evaluation Report
SPLP HDD No. S3-0400 Exton Bypass Crossing
PADEP Section 105 Permit No.: E15-862
West Whiteland Township,
Chester County

Dear Mr. Hohenstein,

On May 30, 2019, Sunoco Pipeline, L.P (SPLP) submitted for public review and comment a Re-Evaluation of the permitted Horizontal Direction Drill (HDD) and proposed replacement construction plans for a segment of the Mariner East II Pipeline Project (Mariner II) known as the Exton Bypass Crossing, S3-0400, as referenced above. SPLP received emailed comments from the Department dated August 13, 2019, requesting additional information concerning the Direct Pipe Bore replacement construction plan.

As a resident of Middletown Township and a landowner living 150 ft from the old, leaky, 12” “workaround” and approx. 1100 ft from the old 87-yr old repurposed ME1 behind me, I would like to submit my grave concerns regarding Sunoco’s new plan for Lisa Drive.

As you are no doubt aware, on Friday 13, 2019 we suffered our second sinkhole in Middletown Township as a result of Sunoco’s HDD activities. The Sleighton Park sinkhole was right next to the HDD entry/exit point and half a mile from my home. What happens at Lisa Drive could have a direct impact on us here.

My concerns are:

1. What happens if the new borehole hits grout from previously filled depressions?
2. Will the grouting material used to fill the Lisa Drive sinkholes be disturbed during boring?
3. Where exactly did all the grout go that was used for the underground voids?
4. We need exact and **detailed information on the location of the grout.**
5. The DEP must demand a **resistivity survey** and not allow for evasive responses.
6. Near its exit point the bore profile is within 19 feet of the surface. If the grout is “15-20 ft” (as stated) underground then there is no guarantee the grout will not be disturbed. If the grout was poured into the holes from ground level then some of it will certainly have

remained near the surface. We therefore need **actual evidence** that the grout is deeper than 20 ft otherwise the direct bore could hit it.

7. What are Sunoco's plans if the direct bore hits the grout? This is not with regard to the cuttings from the boring machine. The question is what contingencies are there if the grout were hit in the boring process? "None" is unacceptable. I urge the DEP to require a contingency plan.
8. I urge the DEP not to accept the direct-bore approach. It is too big a risk to the other pipelines in this easement. For part of the segment, the drill will be in close proximity to the two active NGL lines – the old ME1 and the old 12" "workaround". How will these lines be protected from the drill? Each crosses the planned route of the 20" line at least once.
9. Does Sunoco know the exact location of both ME1 and the 12" "workaround" underground?
10. Sunoco denies the possibility of an alternative route. Why was the route of the existing 12" "workaround" not considered to avoid the vulnerable Lisa Drive location? I urge the DEP to insist on the requirement for examining alternative routes.
11. This plan has the potential to risk more sinkholes and frac-outs. Both inadvertent returns and subsidence are not eliminated with this direct-bore approach. This is not acceptable.

The DEP must insist on the required information and not accept evasive responses. This plan has the potential to damage active pipelines and open new sinkholes. An obvious alternative route has not even been considered. For Sunoco to claim there is no "practicable" alternative is not the case. Sunoco must be required to do better.

Sincerely,

Rosemary Fuller