DEP Permit # E15-862 DEP Permit HDD Reference # PA-CH-0124.0000-RD DEP HDD # S3-0310

Township – Upper Uwchlan & Uwchlan County - Chester HDD Site Name – Pennsylvania Drive

2nd Public Comment Period

Commentator ID #	Name and Address	Affiliation
1	Bobette Burdenski	
	Chester County Resident	
2	Sandra Kerr	
	306 Exton Lane	
	Exton PA 19341	
3	Eileen Rosen	
	West Chester, PA	
4	Melissa Marshall, Esq.	Mountain Watershed
	P.O. Box 408	Association
	1414-B Indian Creek Valley Road	
	Melcroft, PA 15462	
5	Maya K. van Rossum	Delaware Riverkeeper
	925 Canal Street	Network
	7 th Floor, Suite 3701	
	Bristol, PA 19007	
6	Joseph Otis Minott, Esq.	Clean Air Council
	135 South 19 th Street, Suite 300	
	Philadelphia, PA 19103	
7	Alexander G. Bomstein, Esq.	Clean Air Council
	135 South 19 th Street, Suite 300	
	Philadelphia, PA 19103	
8	Kathryn L. Urbanowicz, Esq.	Clean Air Council
	135 South 19 th Street, Suite 300	
	Philadelphia, PA 19103	
9	Marcia Gentry	
	Exton, PA 19341	
10	Bob Redfern	
	451 Old State Road	
	Media PA	
11	David Shuey	
12	Susan Long	
13	Jennifer Nichols	
	Lenni, PA	

14	Bernard Greenberg, MD	Chairman, Southeast PA Sierra Club Pipeline
		Committee
15	Ann Buki	
	56 Kimberwyck Lane	
	Exton, PA 19341	
16	Judith Kay McClintock	
	Ardentown, DE	
17	JoAnn Williams	
	108 Judith La	
	Media, PA 19063	
18	Douglas Spencer	
	Kennett Square, PA	
19	Nancy C Wilson	
	Chester County	
20	Mary Ann Kusner	
21	Scott Greenly	Township Manager,
	715 N. Ship Road	Uwchlan Township
	Exton PA, 19341	_
22	Christina DiGiulio	
23	Danielle Friel Otten	Pennsylvania
	House Post Office Box 202155	Representative
	Harrisburg, PA 17120-2155	_
24	Katie Muth	Pennsylvania Senator
	Senate Post Office Box 203044	-
	Harrisburg, PA 17120-3044	
25	Tammy Krumbhaar	
	36 Meadow Creek Lane	
	Glenmoore, PA 19343	

1. Comment

I am writing out of concern regarding Sunoco/Energy Transfer requesting to do a second HDD at Pennsylvania Drive.

In Chester County bordering Uwchlan and Upper Uwchlan Township which resulted in in several frac-outs and a very large sinkhole. My concerns are many, however, the ground instability in that area and what happens when the installed pipe is removed are pressing for me.

I am requesting Sunoco/Energy Transfer make the geophysical report public for the community to have an opportunity to read and be able to express their concerns. Additionally, I am requesting Sunoco be made to address soil stabilization in order to prevent another sinkhole when the pipe is pulled back. (1)

2. Comment

The DEP musts insist on an adequate answer to each of these two issues related to the Sunoco pipeline.

First, the geophysical report must be made public, and the public must have a chance to read and comment on it.

Second, Sunoco must address the question of stabilizing the soil to prevent another sinkhole when the casing is pulled back.

Do not issue a permit for the HDD at Pennsylvania Drive until these two issues are resolved and the public has a chance to comment on Sunoco's response.

Please do your job in this regard. (2)

3. Comment

No Permit for HDD at Pennsylvania Drive. Make Sunoco accountable. (3)

4. Comment

On March 5, 2020, Sunoco submitted a limited response to the Department's inquiry regarding its reevaluation ("Report") of the horizontal directional drilling ("HDD") indicated by drawing number PA-CH-0124.0000-RD (the "Site"). In that response, Sunoco refused to make public the results of geophysical surveying for the Site. The geophysical results have now been made public. 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 regarding the geophysical survey results.

1. The geophysical survey results have not been incorporated into the Report.

Over years of violations and construction failures that have necessitated reevaluations of its drillings sites, Sunoco has established a pattern of refusing to gather needed information, being forced by the Department to conduct surveys or other testing, and then failing to actually incorporate the results into its plans. Here, we see the same dangerous pattern again. Sunoco has conducted geophysical surveying of the Site but has not used the survey results to improve or even inform its plans. Making the geophysical survey results public was an important and necessary step, but it is nowhere near sufficient. If Sunoco does not actually apply the findings of the surveys to its plans, the surveys are of little value. The Department must not approve the Report until it fully accounts for the results of geophysical surveying.

2. The geophysical surveys do not cover the correct area.

Any geophysical surveys in the vicinity of Sunoco's proposed drilling alignments represent some improvement over Sunoco's preferred approach of proceeding with minimal investigation. Here, the use of multiple geophysical survey methods was the right approach so data could be compared and corroborated. Unfortunately, though, the surveys were all concentrated over the area of the existing 16-inch line and do not cover the area that Sunoco wants to drill through to install the 20-inch line. Thus, while the geophysical surveys might give a better picture of the geology in the area in a general sense, they do nothing to identify the locations of potential voids or other anomalies that might be encountered when installing the 20-inch line. This reevaluation process is about improving the safety of plans for installing the 20-inch line, and yet all of the figures in the geophysical survey results clearly show that the data collected fail to extend to proposed 20-inch alignment. This is unacceptable and a missed opportunity to avoid another dangerous sinkhole. Sunoco was already responsible for creating a massive sinkhole at this very site while installing the previous line. It is crucial that construction of the 20-inch line not proceed without full information and mitigation plans. That means conducting geophysical surveys in the area where Sunoco actually intends to drill.

3. Additional drilling may pose a risk to the 16-inch line.

The geophysical survey results show that the geology around the 16-inch line remains vulnerable. The Report surmises that heavy rainfall and vibration from its drilling contributed to the sinkhole that erupted while constructing the 16-inch line. Those risk factors remain. We can reasonably anticipate more rain this time around and there will necessarily be vibrations from drilling the 20-inch line. While we do not know exactly what underlies the proposed 20-inch alignment because Sunoco has inappropriately limited the scope of its surveys, the surveys do show that anomalies exist around the 16-inch line. Sunoco has not demonstrated that construction of the 20-inch line will not further disrupt the geology around the 16-inch line.

Sunoco's geophysics consultants recommend an area of low gravity on the 16-inch alignment "be inspected by the geotechnical engineer or geologist of record to check for signs of earth movement or excessive infiltration." Sunoco has given no indication that it will follow this recommendation. It would be reckless not to. If construction of 20-inch line activates fractures or voids along the 20-inch alignment, this could trigger groundwater or drilling fluid to move in unexpected ways, causing flooding or inadvertent returns. Even worse, there could be a new subsidence event that could threaten the integrity of the 16-inch line.

Thus, in addition to extending geophysical surveys to cover the area where construction will actually take place and incorporating results of all surveys into the Report to make the construction plans safer, Sunoco must also use the current geophysical survey results to ensure that further construction will not cause problems along the 16-inch alignment.

Thank you for considering these comments. Please keep Appellants apprised of any next steps. (4-8)

Letter – Clean Air Council – 5-4-20

5. Comment

I want to remind the DEP of the unstable geology of this area, as evidenced by a huge sinkhole already caused by Sunoco. The geophysical report must be made public and comment allowed. Sunoco must address the question of stabilizing the soil to prevent sinkholes when the casing is pulled back. Please do not issue a permit for HDD at Pennsylvania Drive! (9)

6. Comment

Do not issue a permit to Sunoco for the HDD at Pennsylvania Drive, Chester County, until the sinkhole stabilization issue is resolved, and the public has a chance to comment on Sunoco's response. (10)

7. Comment

Please do not approve the permits for this drill site until Sunoco properly responds to your request for ground stabilization strategy with or without casing. This area is known to be unstable during previous drilling operations and extreme caution is warranted. (11)

8. Comment

Please do not issue permit to Sunoco for HDD drilling on Pennsylvania Drive in Chester Springs as the ground is unstable and they have yet to address issue. (12)

9. Comment

I am writing about Sunoco's proposed HDD drilling at Pennsylvania Drive, Chester County.

Sunoco's plans in no way address the issue of potential sink holes at the site. This area has already had sinkholes, and soil stabilization must be addressed.

I encourage you to insist that Sunoco rectify this, and the public has a chance to comment on the plan before a permit is issued. (13)

10. Comment

I have two major concerns regarding Sunoco's planned HDD at Pennsylvania Drive in Chester County.

1. Due to the geological features of this area (Karst formation) and the large sinkhole created by HDD during construction of the 16" pipe isn't there a major risk of another sinkhole when the 20" pipe is installed. Another sinkhole could expose the 8" pipeline (ME1). A thorough geophysical report should be made available and adequate time for the public to respond.

2. What will prevent the collapse of unstable soil when the casings are pulled back? How is the soil to be stabilized to prevent another large and potentially dangerous sinkhole?

Please do not issue the required permits until these concerns are adequately addressed. (14)

11. Comment

I am writing to ask you insist that Sunoco directly address the question of stabilizing the soil to prevent yet another sinkhole when performing the HDD and when the casing is pulled back.

Also, do not issue a permit for the HDD at Pennsylvania Drive until this issue is resolved and the public has had a chance to comment on Sunoco's response.

I await your written reply. (15)

12. Comment

On Sunoco's desire to do HDD (horizontal directional drilling) again at Pennsylvania Drive, in Chester County, on the border between Uwchlan and Upper Uwchlan, after a bad track record there.

Sunoco's first HDD at Pennsylvania Drive, in Chester County, on the border between Uwchlan and Upper Uwchlan was a disaster.

During that process, there were multiple frac-outs. Perhaps most disturbingly, a huge sinkhole was created that could have threatened the active 8-inch pipe running in the same right-of-way. Now, the company wants to do a second HDD at that site.

The two main problems with this request are: 1. the unstable geology of the ground in the area, and 2. the question of what happens when the casing (in which the pipe is to be installed) is removed.

These issues were raised in earlier public comments. In the first public comment period, ending February 18, the two issues noted above (among others) were brought up in comments from Mountain Watershed, the Delaware Riverkeeper, and the Clean Air Council. These three well-known commendable organizations pointed out that before allowing their request, Sunoco needed to fully address the risk of another possible sinkhole at the above site, and that it had not done so.

In addition, the unstable geology of the ground in the area, and the question of what happens when the casing (in which the pipe is to be installed) is removed are huge problems. These two questions are interrelated (because unstable ground might collapse if the casing is removed) and they are the questions that the DEP is most interested in, based on their responses to Sunoco.

On February 26, the DEP's Richard Staron wrote to Nick Bryan of Energy Transfer (Sunoco's parent), highlighting ground stability issues including the casing problem: "If [the casing is] temporary, an explanation will be required demonstrating how the overburden will be stabilized in the absence of the casing."

But there has been no answer to the stability issue. On March 5, Monica Styles of ET responded. She avoided directly answering the casing-related question. Styles wrote, "ET's intent is to remove the casings, following completion of the construction of the 20" pipeline, where possible. This determination, however, can only be made after the pipe is completely installed…"

The public must hear a response from Sunoco on the stabilization and casing issues at this site. The DEP must insist that Sunoco directly address the question of stabilizing the soil to prevent another sinkhole when performing the HDD and when the casing is pulled back.

Anything less than that is unacceptable because people's properties and lives are at stake!

Please do not issue a permit for the HDD at Pennsylvania Drive until this issue is resolved and the public has a chance to comment on Sunoco's response.

Thank you for considering my views. (16)

13. Comment

Apparently ground stability means nothing to you. The thought of a pipeline shifting and leaking or blowing up is frightening. This will never work properly in the future that is in a dying and bankrupt industry. Green energy is now and won't blow up and kill you or cause huge sinkholes. This must be stopped. The world doesn't need more pollution or plastic! (17)

14. Comment

I am very concerned about the Sunoco pipeline drilling which is now scheduled to go through an area of Chester County near Pennsylvania Drive bordering on Uwchlan and Upper Uwchlan townships. That area was recently the site of a major sinkhole, and thus far Sunoco has essentially avoided giving a straight answer as to how they are preparing to avoid another one if they continue their horizontal drilling process in that region. They must give a well-documented answer (i.e. with data about the soil and rock in that area) as to how they will stabilize the area as they drill. Thank you for keeping after Sunoco to make them follow the rules. (18)

15. Comment

Sunoco has not adequately provided answers/solutions to the problems inherent with this pipeline through our neighborhood. I ask that you deny them a permit to proceed. My comments are below:

- 1) I hope you noticed that the geological survey presented for the new Pennsylvania Drive HDD is actually not for that area but for an area previously worked. It seems this type of shoddy follow through is typical of Sunoco. It's uncanny how they continue to get permits with their errors, omissions and downright lies. Why is it permitted to slide through unscathed?
- 2) Regardless, there is nothing in Sunoco's reply that addresses the ground stability issue at the Pennsylvania Drive HDD site.

There is nothing said about what Sunoco plans to do to deal with the likely happenings on that site. What will happen if there is a sinkhole?

It is not far-fetched to assume there will be one or more additional sink holes -perhaps matching or exceeding the previous 15,000 cubic ft one which Sunoco
attempted to keep hidden from the local community. An after-the-fact filling of the
cavity with concrete is not a solution to the real problems that our local geology
presents. Some local pipe (hi pressure excess components from fracking traveling
from western PA or our water or sewer lines) will be irreparably disturbed.

Sinkholes are a fact of life in this region and it is beyond stupid to assume that this propensity will not affect Sunoco's high-pressure lines. So, either Sunoco is not willing to say what it plans to do about the possibility of another sinkhole -- or more likely -- it has no plan at all. Don't let them weasel out of being truthful.

And, with a sink hole in one or more of these areas, Sunoco risks their accident taking out our water, sewer and natural gas supplies to businesses and homes. They would decimate our infrastructure and life as we knew it before they arrived with their 'you will never know we are there' promises.

3) We are not in some rural area where only a few deer and trees will fall into the abyss or where a couple hundred scorched acres can re-grow out of sight. This Sunoco pipeline debacle is traveling through a dense suburban area where the homes to be affected are in the thousands and the commercial properties that will be leveled in a blast are valued in the \$ billions.

In my rushed and sloppy data collection on the night before your public comment period ends, I located within a half mile radius of the area being studied (aka conservative blast zone).

160 businesses. Who report 3,800 employees at their local location and \$400 million in sales revenue from the local location.

But not everyone here is selling something. Within a football field distance (300 feet of the corner of Pennsylvania Drive and Rice).

The Chester County Food Bank is here. They distribute to 120 local pantries within our Chester County to serve the 51 thousand families that are food insecure in our county

There are schools, nursery and toddler programs many for these 3800 very-local employees. There are senior apartments, doctors, dentists, insurance agents, etc, etc.

If Sunoco is permitted to do its HDD through this area where there is likely ground instability like in another local attempt and one or more of those parallel high pressure lines of excess components from western Pennsylvania being sent to Europe to produce single use plastics has a rupture, there is a real risk leveling our local economy and killing off some of our best and brightest.

Each of these employees will have to run 'uphill', not using an elevator to exit the building, not using a cell phone, not knowing where to go for safety.

Any employee not physically able to run away will meet a certain fiery demise since no vehicle can be used to help them escape the blast.

Did it ever occur to anyone that we do not yet have any instructions on how to identify danger or to exit danger? In the past, all Sunoco has done is say that that information is 'withheld for Homeland Security reasons'. Somehow that is an appropriate answer to providing real solutions. We are now working on the assumption that we are just expendable to Sunoco. What's a few thousand lives when there are \$Billions to be made.

4) At a minimum, Sunoco must address the question of stabilizing the soil to prevent another sinkhole. This will be where they fail because it is impossible.

I'm nearly positive they will try to weasel out of giving that answer (again) since there really is nothing to protect us from a near term sinkhole or one that develops after the next big rain.

This pipeline should never have been approved without the appropriate geology studies in advance. If those studies had been done when appropriate, this pipeline would never have been started.

5) Please use some common sense and deny them a permit. (19)

16. Comment

Why are you even thinking of listening to these greedy, uncaring, destructive, horrible, foreigners who have invaded and destroyed our peace and enjoyment.

Let them dig and cause water problems, sink holes, and explosions around their homes.

Sunoco cannot sell this gas/oil since there is a glut and no buyers. They may decide to dump gas/oil in sink holes!!

Sunoco has had more than 350 "accidents" and have made me fearful of dying running away from a fireball with my walker.

Sunoco has attempted to cause our deaths, injuries, getting COVID -19 destroying our homes, families, etc. My over 55 condo, with 1720 homes would definitely have nowhere to run. More than 2,000 lives will be lost, worse than California.

What about Gov. Wolf's demand that only essential medical and Security personnel are allowed to work or leave their homes.

If you feel is so wonderful having Sunoco near your home, I am offering to sell my home to you (prices have dropped). Certainly, you will have a very different outlook.

I have heard Sunoco pays off everybody and anybody to get their way. Is blood money that important? (20)

17. Comment

In response the PA DEP's April 30, 2020 posting for public comment on Sunoco Pipeline, L.P.'s geophysical survey report for HDD 310 in Uwchlan and Upper Uwchlan Townships, Uwchlan Township has reviewed the geophysical survey report and submits the following comments for consideration:

- 1. Uwchlan Township recommends that PA DEP require the design professional who is responsible for the Hydrogeologic Reevaluation report review and update the report based upon the completed Geophysical Survey. The Geophysical Survey was not complete at the time of the Hydrogeologic Reevaluation report (noted as pending in Section 2.4 page 9).
- 2. Uwchlan Township recommends Sunoco be required to submit additional analysis to PA DEP prior to the removal of the casing pipe that addresses the following:
 - 1. Post pipe pull subsidence inspections around the casing locations,
 - 2. Review of any issues encountered during the pipe pull (i.e. groundwater flow-back)
 - 3. Ability to pull the casing without adverse effect to the installed pipe
 - 4. The logistics and effectiveness of providing suitable replacement materials (such as backfill soils or grout) following the casing removal.
- 3. Uwchlan Township recommends additional analysis be completed for the reevaluation report and the geophysical survey. The report and survey do not address the existing active 8" pipeline that is located adjacent to constructed 16" pipeline and the proposed 20" pipeline. Sunoco is very lucky the subsidence event did not impact the existing active 8" line and it is important to evaluate need for this

line to be shut down during the HDD process or at least when the casing pipe is proposed to be removed. The Geophysical Survey exhibits do not even note the location of the existing 8" pipeline.

4. Uwchlan Township recommends that additional work be completed for the Geophysical Survey. The limits of the survey do not correlate to the limits of the HDD for the 20" pipe at the entry and exit locations (due to fact areas were inaccessible due to ground mats, construction equipment, and drilling activities. It is important to complete the survey in the area of the proposed work to determine if any areas of concern are noted.

Please do not hesitate to contact me at 610-363-9450 if you have any questions or need any clarification on the comments above. (21) Letter – Uwchlan Township – 5-5-2020

18. Comment

Many people have done their research about this site and the HDD process (which is an abnormally hazardous practice in the hydrology and geology of Delaware and Chester County) and I would like to share with you some of that research:

On February 26, the DEP's Richard Staron wrote to Nick Bryan of Energy Transfer (Sunoco's parent), highlighting ground stability issues including the casing problem: "If [the casing is] temporary, an explanation will be required demonstrating how the overburden will be stabilized in the absence of the casing."

No answer to the stability issue. On March 5, Monica Styles of ET responded. She avoided directly answering the casing-related question. Styles wrote, "ET's intent is to remove the casings, following completion of the construction of the 20" pipeline, where possible. This determination, however, can only be made after the pipe is completely installed and the area around the casings is evaluated for but not limited to: 1) post pipe pull subsidence inspections around the casing locations, 2) review of any issues encountered during the pipe pull (i.e. groundwater flowback) 3) ability to pull the casing without adverse effect to the installed pipe 4) the logistics and effectiveness of providing suitable replacement materials (such as backfill soils or grout) following the casing removal."

None of Styles' answers addresses the DEP's request, which was "an explanation ... demonstrating how the overburden will be stabilized in the absence of the casing."

- Answer #1 just addresses the situation before the casing is removed, not "in the absence of the casing."
- Answer #2 speaks to "groundwater flowback" but not the stability of the ground without the casing.
- Answer #3 addresses whether the pipe would be damaged by pulling back the casing (and it doesn't say how that assessment would be done) but it does not mention the resulting situation "in the absence of the casing."

• Answer #4 tells ways that a sinkhole could be filled if one is created, but it fails to address the question of stabilizing the soil to prevent such an event, which could trigger a catastrophe.

Meanwhile, Sunoco finally released the geophysical testing report for this site (which it had earlier refused to make public, claiming it was "Confidential Security Information, which of course, it was not). The report is embarrassing for Sunoco, though, because it covers the area where the previous pipe is already in the ground, instead of covering the area where the new HDD will take place.

Neither Styles' memo nor the geophysical report really addresses the ground stability issue or Sunoco's plans to deal with it. Either Sunoco is not willing to say what it plans to do about the possibility of another sinkhole, or it may have no plan at all.

As a resident of Upper Uwchlan Township, I insist on a response to the stabilization issue. It is the duty of the DEP to insist that Sunoco must directly address the question of stabilizing the soil to prevent another sinkhole when performing the HDD and when the casing is pulled back.

In that, I insist that the DEP adhere to good practice in protecting the environment and water and do not to issue a permit for the HDD at Pennsylvania Drive until this issue is resolved and the public has a chance to comment on Sunoco's response.

As well - this area is close to a wetland. Being that Sunoco continually infiltrates groundwater with an industrial waste been been tonight and with the current Federal Supreme Court ruling that ground water is included in the Clean Water Act protections, is the DEP aware that an NPDES permit could possibly be required for this process? I have been made aware by the DEP that they typically do not cover groundwater nor the aquifers which our aquifers and groundwater lead directly to protected waterways of Pennsylvania's - it is called Chester Springs for a reason. Do you have evidence that the ground water in the area does not lead directly to that wetland or any other waterway in UUT or Uwchlan Township? Because the way I see it, the industrial waste they are using and infiltrating our groundwater with on several occasions now-that drilling mud which cannot get into those waterways because it is an industrial Waste and does threaten life and the health of said waterways- must be looked at as a source point for contamination. The groundwater must be considered as a source of travel for contaminants into these waterways which are protected by the CWA and therefore is DEP's duty to prove that that groundwater (which suNOco cannot avoid casing or not) does not get into those waterways. it is not Sunoco duty it is your duty to understand the hydrogeology of the area in which you are permitting. My final question is do you have the scientists which are qualified to determine this and are you coordinating with the Pennsylvania geological Survey is the USGS, who have the scientists and understanding to be qualified to determine this? If there are resources available, I do hope the DEP reaches out to those resources because the evidence is pretty clear at this point rubberstamping permits which allow for contamination of groundwater is a huge liability for this

state. I do hope our state scientists are aware that plausible deny ability is non-existent at this point, and good practice in science is your strongest tool. (22)

19. Comment

Thank you for soliciting public comment on Sunoco's geophysical survey report at HDD 310 in Uwchlan and Upper Uwchlan townships.

We echo the concerns raised by the Clean Air Council, Mountain Watershed Association, Inc., and the Delaware Riverkeeper Network in the public comment periods ended February 18, 2020 and March 31, 2020, as well as the concerns cited in the DEP's initial response to Energy Transfer, dated February 26, 2020. Specifically, the ground in the immediate area is known to be unstable, and the question of what will happen when the casing is removed remains unanswered and unresolved. Nothing in Energy Transfer's original proposal, geophysical survey report, or March 5 response to DEP satisfactorily addresses or alleviates these concerns.

The 25-foot by 20-foot by 30-foot sinkhole created when Sunoco drilled to install the 16-inch line at the same site was only yards away from the existing, operational 8-inch line. Nothing in Sunoco's initial proposal, geophysical survey, or March 5 response to DEP suggests that they have taken any measures or found any solution to prevent a similar sinkhole from developing as they drill for (or remove casing from) the 20-inch line. They have demonstrated no efforts to minimize or mitigate the risk of exposing or destabilizing the 8-inch pipe, the 16-inch pipe, or any of the several public water and sewer lines that transect the site.

In the DEP's February 26 response to Energy Transfer, the department required an explanation "demonstrating how the overburden will be stabilized in the absence of the casing." Absolutely nothing in Energy Transfer's response satisfies this requirement. The response refers to inspections of the site before the casing is removed (with no details about the manner of such inspections), the potential for groundwater flowback during the pipe installation, and the potential for damage to the installed pipe resulting from casing pullback, but never do they address the stability of the ground without the casing.

Just as disturbingly, Energy Transfer's response includes a reference to "suitable replacement materials" to fill a sinkhole or subsidence in the event one is created. They fail to present any plans whatsoever for stabilizing the soil to prevent a subsidence event, which could result in catastrophe. Once again, Energy Transfer presents subsidence and sinkholes as an acceptable risk—and even an expected outcome—of construction activity. We have seen this movie before, and this is not a risk or an outcome we are willing to accept.

Sunoco must directly address the question of stabilizing the soil to prevent another sinkhole in the course of drilling and casing pullback, and the public must have the opportunity to comment on Sunoco's response in a public hearing. If the current stay-at-home order precludes a public hearing from taking place, DEP should arrange

for a virtual hearing, or postpone issuing a permit or determination on this reevaluation until such hearing can take place.

Under no circumstances should the HDD-310 permit be approved until (1) the question of ground stability is resolved, (2) the public has had ample opportunity to be heard, and (3) the Department of Environmental protection can assure the public that the department is able to operate at full capacity with regard to site inspections, regulation enforcement, and incident response, particularly given Energy Transfer's long and well-documented history of ground subsidence incidents and failure to identify or report such incidents.

Thank you for your consideration of these comments. We implore you to keep the health and safety of our communities at the center of your deliberations. (23, 24) Letter – PA Senator Katie Muth & PA Representative Danielle Friel Otten 5-5-20

20. Comment

My name is Tammy Krumbhaar. I am a resident of Upper Uwchlan Township and am concerned about the proposed HDD at the site on Pennsylvania Drive. There were major problems with Sunoco's first HDD at Pennsylvania Drive. These problems have not yet been resolved. (multiple frac-outs and sink holes) Energy Transfer has done nothing to address the instability in the ground when removing the existing casing. Their reports show a lack of clear knowledge in their expertise to address this issue. When pressed, they hide under the guise of "confidential and secure information." We, as a community, need transparency and the DEP to do their job of "protecting the environment" from those who wish to benefit financially by destroying it and our livelihood. When the drilling occurs and the ground fails, we, the community, will be pointing our fingers at you for your lack of oversight.

Sunoco must directly address the question of stabilizing the soil to prevent another sinkhole when performing the HDD and when the casing is pulled back. It is not much to ask. Please make this your priority in order to protect those who reside and work in the areas impacted by the pipeline that is carrying Highly Volatile Liquids for capitalist ventures. This pipeline is in no way, other than by title, a public utility. Please protect our livelihood. (25)