

**DEP Permit # E15-862**  
**DEP Permit HDD Reference # PA-CH-0212.0000-RD**  
**DEP HDD # S3-0370**  
**Township – West Whiteland**  
**County - Chester**  
**HDD Site Name – North Pottstown Pike Crossing**

**2nd Public Comment Period**

<b>Commentator ID #</b>	<b>Name and Address</b>	<b>Affiliation</b>
1	Joey G.	
2	Christina Johnson Delaware County, PA	
3	Kevin Grubb	
4	Matt Teacher	Sine Studios, LLC
5	Deena K. O’Neill Delaware County	
6	Rick Valenti Brookhaven, PA	
7	Jennifer Nichols	GreenWeaver Landscapes
8	Rachel Kelly	
9	Margaret Quinn Exton, PA	
10	Melissa Romano	
11	Aurora Dizel	
12	Bernard Greenberg	
13	Carrie Gross Exton, PA	
14	Deb	
15	Alisha Parsons	
16	George Alexander Media, PA	
17	John Quinn	
18	Joshua Isard	
19	Joanne Seavey 604 Brecknock Drive Exton, PA	
20	James and Emily Scarola 504 Lakeside Drive Exton, PA 19341	
21	Richard DiGiulio	
22	Jillian Boyle	

23	Alexa and Kevin Manning 805 Graystone Lane Downingtown, PA 19335	
24	Judith McClintock 1601 Harvey Rd. Ardentown, DE 19810	
25	Linda Smith	
26	Margaret Fernandes 8 Katie Way West Chester, PA	
27	Melissa Marshall, Esq. P.O. Box 408 1414-B Indian Creek Valley Road Melcroft, PA 15462	Mountain Watershed Association
28	Aaron J. Stemplewicz, Esq. 925 Canal Street 7 <sup>th</sup> Floor, Suite 3 Bristol, PA 19007	Delaware Riverkeeper Network
29	Joseph Otis Minott, Esq. 135 South 19 <sup>th</sup> Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
30	Alexander G. Bomstein, Esq. 135 South 19 <sup>th</sup> Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
31	Kathryn L. Urbanowicz, Esq. 135 South 19 <sup>th</sup> Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
32	Janet Marchetti	

**1. Comment:**

It is blatantly obvious that Sunoco does not have sufficient safety measures and geological information to continue to construct the Mariner East 2 pipeline. Not only that, but the fact that they are strong-arming landowners and conducting questionable business practices is enough to immediately halt construction. We need oversight of this project and we need to make Sunoco responsible for informing residents of the impacts of this construction. And there needs to be some kind of enforcement of authority over Sunoco when they violate the rules. (1)

**2. Comment**

I'm writing as a concerned resident that lives along the Mariner East Pipeline route. I am writing to ask you (DEP) to reject the current re-evaluation plan that has been submitted by Sunoco/ETP for open trench digging along route 100 in Chester County. When you look at the response (or lack thereof) given by Sunoco, it is obvious that they have failed to do the simple task of RE EVALUATING their plans. They have NOT looked into other possible (less destructive) routes. They are taking the easy

way out, and have gotten away with destroying our land, air and water for too long. They have continued to spill their drilling mud, have NOT reported it properly to DEP or Fish and Boat officers. It is clear that this company CAN NOT be trusted. They have never properly evaluated the surrounding land, and have caused a sinkhole! Homes are going to be condemned, well have been contaminated, our streams have been destroyed. This company clearly is not operating safely. It is YOUR duty to assess these plans. (2)

**3. Comment**

I am a resident of West Whiteland Township in West Chester, PA.

I recently read Sunoco's responses to your requests for more information about their new "open trench" plans. Frankly, I find the information they provided to be unacceptable.

You had 5 specific requests, and for 3 of them, they gave you no new information at all (requests #2, 3, and 4). And, it looks to me like they did not seriously consider other alternative routes for the pipeline, as evident in their answer to request #1.

The entire Mariner East 2 project is seriously concerning, and these answers are just more proof that Sunoco should not be permitted to continue it. They are not taking enough responsibility for their actions. The citizens of Pennsylvania are bearing far too much of the responsibility for making sure our state is safe today and for generations to come.

Thank you for your work and for listening to my concerns. (3)

**4. Comment**

I'm writing to voice my concern over Sunoco's answers, or lack thereof, to your recent questions. Please do not let them get away with their bullying ways. We are counting on you to protect us. This pipeline is not something that's benefitting our community and is, in fact, causing short term stress for residents and long term imperilment. Thank you for your time. (4)

**5. Comment**

Hi! I'm writing to you today to encourage you to hold Sunoco accountable and provide the information that the DEP has requested.

They keep passing the buck onto the DEP when residents deserve clear answers. (5)

**6. Comment**

Welcome to today's America. Where Corporations and \$\$\$ make the rules and determine the fate of our nation. All for their own betterment and huge profits. With no concern for the public or general welfare of our nation, they run rough shod over rules and regulations, (even bribe officials, I'm sure) and like Trump, arrogantly refuse to respond to requests to provide info. DISGRACEFUL!!!

As you are aware, this pipeline runs thru densely populated communities (sometimes 20-30' from homes) with no concern for safety or the public interest. The only concern seems to be maximizing profits for Sunoco!

How this got approved in the first place is still a mystery. It would seem that many public officials abdicated their responsibilities (or worse) and gave Sunoco a green light to initiate this dangerous travesty of a pipeline! As I said "Welcome to today's America !" (6)

**7. Comment**

I am writing regarding Sunoco's "open trench" plan for its route for the Mariner East 2 pipeline under Rte. 100 in Chester County. My understanding is that Sunoco has failed to adequately answer the DEP's questions for additional information regarding this new plan. The DEP should not allow Sunoco to continue with this plan until they can provide adequate answers as to the environmental impact of this new plan. (7)

**8. Comment**

I'm asking the DEP not to back down on getting the information it needs to protect the public. Sunoco needs to provide more information about their plans, like a risk to water supplies, sink holes, and surface impacts. If this information exists it's not available to the public. It clearly was not adequate to address DEP's very reasonable concerns as DEP's request came after Sunoco supposedly supplied that information. (8)

**9. Comment**

Construction will destroy trees and wetlands in the center of Exton. Wetlands act as water purification, flood protection, and water recharge. A Damage Assessment needs to be done by Army Corps of Engineers EPA's section 404 Enforcement needs to do Field Research and damage assessments including storm water management. An EPA study needs to be made of the 3 streams that will be affected in the construction area. Digging and Construction in a highly populated area threatens our clean air and water. Traffic assessments must be made to report how it will be effected by construction under Rt 100. (9)

**10. Comment**

This is a comment concerning Second! Response to North Pottstown Pike Crossing in West Whiteland Township Crossing DEP Permit number E15-862 DEP HDD #S3 0370 Digging and Construction in a highly populated area threatens our clean air and water. Traffic assessments must be made to report how it will be effected by construction under Pottstown Pike which is very busy at all times. There are streams and aquifers in this area that need to be protected. (9)

**11. Comment**

As a resident of Pennsylvania, we need pipelines to heat our homes. ME2 however is not one of them. Carrying these dangerous odorless colorless explosive liquid gases

are much too dangerous. With their dangerous hazardous liquids pipelines, Sunoco has the potential to destroy the lives, property and environment of Pennsylvania residents. We need you to STOP the expansion of these pipelines. They do not belong in a highly residential area. The original pipeline route was constructed long before Delaware and Chester county were as populated as they are now. The risk to local residents is not worth the use of these liquids for plastic production over sea.

Since April, Sunoco has been responsible for over 90 drilling spills, which have polluted springs, creeks, aquifers and private wells. And for what? To ship this product overseas to make plastics. This is an outrage. But not as much of an outrage as placing these dangerous pipelines so close (from 25 feet to 680 feet) to schools, homes, apartments, hospitals, malls, heavily trafficked roads and businesses. In the event of a leak/explosion, many lives would be lost and property damaged. May I remind you that Sunoco has the WORST safety record in the industry.

Unfortunately, there is nothing pretty about large construction projects - from highways to pipeline projects like Mariner East 2. Horizontal Directional Drilling (HDD) has had devastating effects on our waterways, wetlands, natural resources and especially our families. The construction of this pipeline in environmentally sensitive areas is taking it's toll. HDD has been a nightmare. Waterways, aquifers and private wells have been rendered useless due to Sunoco's carelessness and disregard for your constituents. Their poor safety record is atrocious. ETP has proven themselves to be a poor choice of partners for the people of Pennsylvania. The alternative option of open cut trench installation has the same negative impact to Pennsylvania's wetlands, steams, and other environmentally sensitive areas.

Despite Sunoco's non-compliance with multiple regulations, the Mariner East 2 project was illegally vetted, reviewed and permitted by the Pennsylvania Department of Environmental Protection. Mariner East has been discussed, debated and LIED about by Sunoco during formal comment sessions. Again they have not fully answered the DEPs questions regarding open trenching. This project needs to be STOPPED NOW. For all of these reasons, I am writing to you and your office to implore you to end this project immediately. (10)

## **12. Comment**

As a resident of Pennsylvania, we need pipelines to heat our homes. ME2 however is not one of them. Carrying these dangerous odorless colorless explosive liquid gases are much too dangerous. With their dangerous hazardous liquids pipelines, Sunoco has the potential to destroy the lives, property and environment of Pennsylvania residents. We need you to STOP the expansion of these pipelines. They do not belong in a highly residential area. The original pipeline route was constructed long before Delaware and Chester county were as populated as they are now. The risk to local residents is not worth the use of these liquids for plastic production over sea.

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product overseas to make plastics. This is an outrage. But not as much of an outrage as placing these dangerous pipelines so close (from 25 feet to 680 feet) to schools, homes, apartments, hospitals, malls, heavily trafficked roads and businesses. In the event of a leak/explosion, many lives would be lost and property damaged. May I remind you that Sunoco has the WORST safety record in the industry.

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### **13. Comment**

It is extremely disappointing to review Sunoco's replies to your questions regarding their request to use the open trench approach for ME 2 in Exton as they cross route 100 in a very busy shopping area. They have not provided an adequate reason to use an alternate route which would provide much less disruption and greater safety to residents and shoppers. The route chosen in Chester County follows the route of ME 1 which was constructed in 1931 when there were mostly rural farmlands with few residents and no shopping malls. Behind Sunoco's decision to convert from HDD, which they cannot use because of the topography, to open trench is their concern that they cannot obtain the necessary easements for an alternate route which will also result in further delays in completing this pipeline project. They do not appear concerned at all about either our residents or our environment.

I urge you to deny their request and demand that they pursue an alternate route distant from this densely populated residential and business area.

Bernard Greenberg. Chairman SPG Sierra Club Pipeline Subcommittee and member East Goshen Environmental and Safety Advocates steering committee. (12)

#### **14. Comment**

Digging and Construction in a highly populated area threatens our clean air and water. Traffic assessments must be made to report how it will be effected by construction under Pottstown Pike which is very busy at all times. There are streams, ponds and aquifers in this area that need to be protected in this area. Sunoco still needs to provide additional information on how open trenching and conventional boring can be undertaken without causing or exacerbating sinkholes and associated impacts. Sunoco needs to show evidence that this Pipeline will NOT affect Public and Private water supplies. Sunoco needs show that they examined an alternate route, they have NOT! Please do not allow open trench through Exton. (9, 13, 14, 15)

#### **15. Comment**

1. ME2 if not stopped will be carry highly volatile gases through a highly populated area. Putting thousands of citizens at risk of death if there is a leak.
2. There needs to be an independent Risk Assessment (Not Sunoco) regarding the Blast Radius before any permits for this area are given.
3. This Pipeline will pass through Sunrise Senior Living Property It would be impossible to evacuate this facility in time after a leak.
4. This Pipeline will make the Library, Exton Mall, and surrounding shopping and residential areas a dangerous place for citizens to be and live.
5. This Pipeline will bring property values down because people do not want to live and raise their families in a Blast Zone.
5. Construction will destroy trees and wetlands in the center of Exton. Wetlands act as water purification, flood protection, and water recharge.

A Damage Assessment needs to be done by Army Corps of Engineers EPA's section 404 Enforcement needs to do Field Research and damage assessments including storm water management.

An EPA study needs to be made of the 3 streams that will be affected in the construction area.

6. Digging and Construction in a highly populated area threatens our clean air and water.
7. Traffic assessments must be made to report how it will be effected by construction under Rt 100. (9)

#### **16. Comment**

This is a comment on Sunoco's response to your questions concerning their plan for open trenching at North Pottstown Pike (Route 100). I consider the responses from Sunoco to be completely unacceptable.

Sunoco did not take seriously the request to consider an alternative route, as you requested in your first question. Of course it would create "a new greenfield corridor", as Sunoco states. Why is that bad, if it results in a route that is safer for people and less damaging to the environment? An alternative route could perhaps

have avoided the Aqua wells and aquifers too. And Sunoco simply refused to address your questions 2, 3, and 4. You need to revoke their permits altogether! (16)

### **17. Comment**

- Sunoco’s overall response to DEP was dismissive, misleading, and lacking in substance.
- Sunoco must respond to these very reasonable questions with the sufficiency and authenticity they deserve, considering the great risk to our safety and environment.
- Sunoco’s rerouting arguments are incredibly vague and do not provide verifiable details about specific paths they’ve considered. The DEP and residents are essentially asked to blindly trust Sunoco’s conclusions.
- The limited information Sunoco does provide reflects an artificial constraint that an alternate route would have to fall within a relatively narrow distance from its original path.
- The response disregards that alternate paths, even if they are in other significantly-populated areas, may very well be conducive to HDD - a key reason why Exton was originally considered viable. Sunoco is also making a false, presumptive argument that, because rerouting would add new pipelines easements, doing so is fundamentally worse than the risks and destructive impacts of trenching in Exton.
- Answers to questions 2, 3, and 4 share a common theme: they blatantly disregard that the DEP requested additional information for a reason — because the original information Sunoco provided was insufficient.
- Sunoco is misleading in its claim that they previously had “no available information” about the Aqua municipal wells to rule out HDD. In reality, they simply didn’t take the time to do the proper analysis until after they got the permits. (17)

### **18. Comment**

Sunoco’s pipeline work in Exton must be paused or halted all together for the following reasons:

Sunoco’s overall response to DEP was dismissive, misleading, and lacking in substance.

Sunoco must respond to these very reasonable questions with the sufficiency and authenticity they deserve, considering the great risk to our safety and environment.

Sunoco’s rerouting arguments are incredibly vague and do not provide verifiable details about specific paths they’ve considered. The DEP and residents are essentially asked to blindly trust Sunoco’s conclusions.

The limited information Sunoco does provide reflects an artificial constraint that an alternate route would have to fall within a relatively narrow distance from its original path.

The response disregards that alternate paths, even if they are in other significantly-populated areas, may very well be conducive to HDD — a key reason why Exton was

originally considered viable. Sunoco is also making a false, presumptive argument that, because rerouting would add new pipelines easements, doing so is fundamentally worse than the risks and destructive impacts of trenching in Exton.

Sunoco is misleading in its claim that they previously had “no available information” about the Aqua municipal wells to rule out HDD. In reality, they simply didn’t take the time to do the proper analysis until after they got the permits. (18)

### **19. Comment**

After reading the questions from the DEP and answers from Sunoco, it appears that Sunoco was submissive, not answering request by DEP for further information.

The reason DEP requested further information was because Sunoco didn't provide specific details in the first place. Yet Sunoco indicates they had already provided. NOT.

Where are the specific details on other pipeline paths they considered?

Why wasn't specific analysis provided on Aqua municipal wells done before permits were issued. Why was HDD ruled out after permits were issued? Their failure to even research.

They did not provide answers and should be halted until they do. They are arrogant about community safety and property. (19)

### **20. Comment**

We recently reviewed Sunoco’s response to the DEP’s request for more information related to the aforementioned permit. Despite your very thoughtful questions which reflected many of our key concerns, we were extremely disappointed that Sunoco’s response was dismissive, misleading, and lacking in substance.

Question 1: Alternative routes

- Sunoco’s justifications are incredibly vague and largely just restate claims from their prior application. Where exactly have they considered crossing? Where exactly are the difficulties? Rather than providing verifiable details about specific paths they’ve considered, they mention general regions and directions. Absent specificity and supporting maps/illustrations, the DEP and residents are essentially asked to blindly trust Sunoco’s conclusions.
- The scarce information Sunoco does provide reflects an artificial constraint that an alternate route would have to fall within a relatively narrow distance from its original path. Other options could be surfaced if the evaluation radius were to be expanded.
- The response disregards that alternate paths, even if they are in other significantly-populated areas, may very well be conducive to HDD — a key reason why Exton was originally considered viable. Sunoco is also making a false, presumptive argument that, because rerouting would add new pipelines easements,

doing so is fundamentally worse than the risks and destructive impacts of trenching in Exton. We strongly disagree.

Questions 2, 3, and 4: Water supplies, water resources, and sinkholes

- All of these responses share a common theme: they blatantly disregard that the DEP requested additional information for a reason — because the original information Sunoco provided was insufficient. These are all serious question marks, and to insult the DEP and the public by dismissing legitimate requests is unacceptable.

Question 5: Changes in conclusions about HDD viability

- Sunoco is misleading in its claim that they previously had “no available information” about the Aqua municipal wells to rule out HDD. In reality, they simply didn’t take the time to do the proper analysis until after they got the permits. This was an egregious deficiency (not a surprise, as Sunoco portrays it), which the DEP thankfully identified and held Sunoco accountable to evaluate.

This overall response from Sunoco is inadequate and unacceptable, considering the great risk to our safety and environment. In order to satisfy our shared concerns, please demand that Sunoco respond to these very reasonable questions with the sufficiency and authenticity they deserve. (20)

## **21. Comment**

Please require Sunoco to fully respond to all DEP questions.

Here is the issues I have with Sunoco’s responses:

- Sunoco’s overall response to DEP was dismissive, misleading, and lacking in substance.
- Sunoco must respond to these very reasonable questions with the sufficiency and authenticity they deserve, considering the great risk to our safety and environment.
- Sunoco’s rerouting arguments are incredibly vague and do not provide verifiable details about specific paths they’ve considered. The DEP and residents are essentially asked to blindly trust Sunoco’s conclusions.
- The limited information Sunoco does provide reflects an artificial constraint that an alternate route would have to fall within a relatively narrow distance from its original path.
- The response disregards that alternate paths, even if they are in other significantly-populated areas, may very well be conducive to HDD — a key reason why Exton was originally considered viable. Sunoco is also making a false, presumptive argument that, because rerouting would add new pipelines easements, doing so is fundamentally worse than the risks and destructive impacts of trenching in Exton.
- Answers to questions 2, 3, and 4 share a common theme: they blatantly disregard that the DEP requested additional information for a reason — because the original information Sunoco provided was insufficient.
- Sunoco is misleading in its claim that they previously had “no available information” about the Aqua municipal wells to rule out HDD. In reality, they simply didn’t take the time to do the proper analysis until after they got the permits. (21)

## **22. Comment**

My husband and I have been homeowners in West Whiteland Township in Exton for 15+ years. We have two school-age children, and are very concerned about the health and safety issues related to the Sunoco pipeline, particularly now that the new route for the pipeline is practically through our backyard.

I have reviewed Sunoco's responses to the latest 5 questions posed by DEP about the plan to reroute the pipeline, and I am completely unsatisfied with the answers. I consider these responses from Sunoco to be wholly unacceptable.

They did not take seriously the request to consider an alternative route posed in Question 1. If they had, they would probably also have been able to avoid the Aqua wells. Sunoco's rerouting arguments are incredibly vague. They don't provide any verifiable details about specific paths they have actually considered. The DEP and residents are essentially being asked to blindly trust Sunoco's conclusions here.

More concerning, however, was the apparent refusal to provide answers to Questions 2, 3, and 4. These questions were asked because previous information provided was insufficient, yet Sunoco simply refers DEP back to that same information and ignores these questions. They are not taking this seriously enough.

As a resident, my family and I will be directly impacted by the initial work to route this pipeline as well as any longer term safety problems that may arise as a result. I am not at all comfortable with the details provided by Sunoco, nor do I believe they are taking the public's health and safety seriously. Our opinion on this situation matters, we deserve thorough analysis and answers here, and I want my comment to be on record. (22)

## **23. Comment**

We are writing to you in regard to Sunoco Pipeline's recent letter in regard to your correspondence to them with the request for additional information about their plan to construct the pipeline through the North Pottstown Pike, Exton Mall area in West Whiteland, Chester County. We are concerned about the company's reply to the issues that you would like them to address.

1. Sunoco does not address alternatives that may impact the residential, commercial, institutional areas, woodlands, and surface waters but states that rerouting would result in new impacts and there is no practicable reroute option to the north or south of the proposed route that would not cross additional water resources. As stated by Sunoco, rerouting of the project to the southwest would be complicated significantly by the increased density of development towards the City of Downingtown. A northeasterly route would pass through significant areas of development. This shows that there is no good route through this area that would not have major impacts on the environment and densely built up areas in this vicinity.

2. Impacts to public and private water supplies, water resources including streams and wetlands, construction in the porous Karst topography which has already caused sinkholes and other issues, will continue if the construction proceeds as planned.

3. Sunoco needs to determine complete safety of the water supply (public and private) before any work continues. My family relies on public water from one of Aqua PA wells and we know people whose private well was compromised. This is a public health issue.

For these reasons, we do not believe that the company has adequately addressed the issues defined in your letter to them and should not resume plans to construct the pipeline until these are addressed. If they cannot be addressed and for the reason of the safety issue of highly volatile liquified natural gas that will transported through these densely populated areas, the pipeline should be halted.

Thank you very much for your thorough review of the significant impacts of this pipeline on our health and safety. We look forward to hearing from you. (23)

#### **24. Comment**

The DEP has recently asked Sunoco a series of questions about its new “open trench” plan for its route for the Mariner East 2 pipeline under Rte. 100 in Chester County. Sunoco responded on December 20. In its response, Sunoco basically avoided answering the DEP’s questions.

Sunoco’s response is totally unacceptable. This behavior is not only unacceptable - it is clear that the DEP should not allow Sunoco to proceed with construction on the pipeline until they provide proper answers to these five questions!! (24)

#### **25. Comment**

I live on Exton Lane which is also a part of Meadowbrook Manor and I share a community well with nine other residents. I have contacted both Senator Dinniman and Representative Milne regarding my concerns not only with the well but with my own property. I fear we may suffer the same fate as the residents on Valley View Drive in Exton. There is a good chance that the weight of the heavy equipment may cause the pipes to from the well to burst, as well as the possibility of contamination, or worse, the well could run dry.

The existing Sunoco pipe lines run diagonally through the back corner of my property. Two years ago when I signed for the easement expansion I was assured all work would be deep underground, no property, including my swimming pool, would be impacted and if any damage was incurred, Sunoco would be responsible for the repair. Apparently, Sunoco’s engineers were too incompetent or just plain negligent and did not contact Aqua regarding the drilling site on Swedesford Road and have been required to change the location and the work will now be done much closer to the surface creating huge unsightly and dangerous trenches. I have been told by the Percheron representative, Bob Reilly, the trees on my property (and those on the

neighbor behind me and next to me), will have to be cut down. Part of my fence will have to come down, my shed will have to be moved, and the powerlines running behind my property will have to be raised to accommodate the big equipment. This will all be perilously close to the pool, my waterline, and will likely crush the bamboo barrier I was forced to install because my neighbor foolishly planted bamboo which is growing toward the sun and was taking over my property.

Thank you for your review of my concerns and your comments. (25)

## **26. Comment**

I am writing you to express my concern over Sunoco Mariner East2 Pipeline new plan to go thru the heart of Exton. As it passes the library, this approach destroys many of the remaining old-growth trees and much of the only significant remaining wetland in the center of Exton. And it runs right through the heart of downtown Exton, alongside the library and two major shopping malls, creating a massive, unnecessary danger to hundreds of people every day.

Sunoco failed to consider alternative routes. Sunoco filed the report with the DEP as the result of an agreement the company signed in August with the Clean Air Council and two other environmental groups. By the terms of that agreement, Sunoco is required to "...propose modification of the design of the HDD or relocation of the pipeline...."

But Sunoco has not met that requirement. It has not seriously considered relocation. Instead of insisting on routing the pipeline through the center of Exton, why didn't Sunoco consider a route through rural countryside a quarter of a mile to the north, on the other side of Ship Road? The damage to the environment would be far less, and the risks in the event of a leak would be dramatically smaller. But neither this nor any other alternative route was even considered.

The only reason the report gives for sticking to this route is that the company "routed the Project to be co-located with existing pipeline and other utility corridors to avoid new 'greenfield' routing alignments, to the maximum extent practicable." That was already a weak argument when the pipeline was to be located far underground; but now that Sunoco is proposing to locate it near the surface, it is disastrous.

This plan must be stopped.

It is my understanding that the DEP requested additional information from Sunoco and their response is not sufficient for the following reasons:

- 1) Sunoco's overall response to DEP was dismissive, misleading, and lacking in substance.
- 2) Sunoco must respond to these very reasonable questions with the sufficiency and authenticity they deserve, considering the great risk to our safety and environment.

- 3) Sunoco's rerouting arguments are incredibly vague and do not provide verifiable details about specific paths they've considered. The DEP and residents are essentially asked to blindly trust Sunoco's conclusions.
- 4) The limited information Sunoco does provide reflects an artificial constraint that an alternate route would have to fall within a relatively narrow distance from its original path.
- 5) The response disregards that alternate paths, even if they are in other significantly-populated areas, may very well be conducive to HDD — a key reason why Exton was originally considered viable. Sunoco is also making a false, presumptive argument that, because rerouting would add new pipelines easements, doing so is fundamentally worse than the risks and destructive impacts of trenching in Exton.
- 6) Answers to questions 2, 3, and 4 share a common theme: they blatantly disregard that the DEP requested additional information for a reason — because the original information Sunoco provided was insufficient.
- 7) Sunoco is misleading in its claim that they previously had “no available information” about the Aqua municipal wells to rule out HDD. In reality, they simply didn't take the time to do the proper analysis until after they got the permits. (26)

## **27. Comment**

On December 20, 2017, Sunoco submitted a letter to the Department in response to the Department's requests regarding horizontal directional drilling site PA-CH-0212.0000-RD (“Site”). Pursuant to the Corrected Stipulated Order entered on EHB Docket No. 2017-009-L on August 10, 2017, and on behalf of Clean Air Council, Mountain Watershed Association, Inc., and the Delaware Riverkeeper Network (“Appellants”), please accept these comments in reply.

Appellants strongly support the requests for information and analysis made in the Department's December 6, 2017 letter to Sunoco and believe those requests are consistent with the Department's duty to protect the health and safety of the public and the environment. Sunoco's recalcitrant response does not address the concerns raised by the Department, and certainly provides no basis upon which the public or the Department can assess Sunoco's plans for the Site.

The Department asked Sunoco to “explain what alternatives have been considered.” A meaningful analysis requires weighing quantitative and qualitative details about the potential environmental impacts of alternatives. Sunoco's response makes clear it refuses to engage in such an analysis. Sunoco does not actually propose or consider any specific alternative routes. Instead, it relies on generalities about greenfields and practicability that are too vague to verify or examine.

Sunoco also provided no substantive response to the Department's requests for additional information regarding impacts to water resources and avoidance of sinkholes. It only references information it claims to have provided to the Department as part of its Major Modification Permit request on October 17, 2017. Given that the Department's request for additional information was issued over two months later,

Appellants have no reason to believe the information the Department has requested was provided to the Department as part of a Major Modification Permit request. Furthermore, as part of the re-evaluation report for the Site that was submitted on November 8, 2017, Sunoco included what appears to be a copy of its Major Modification Permit request as Attachment 2: PADEP Permit Modification Package. That document plainly does not provide the information and analysis the Department requested. It includes modified maps and site plans but makes no substantive changes to its analysis and mostly reflects changes to dates and headings. If Sunoco did, in fact, submit a more comprehensive document to the Department on October 17th and it addresses the Department's concerns, Appellants request that document be made available to the public for review.

The information and analysis the Department has sought but not yet received is vital for the protection of the public. Please do not back down.

Thank you for considering these comments. Please keep us apprised of your next steps on the Site. (27-31)

Letter – [Clean Air Council - 12-25-17 - North Pottstown Pike Crossing](#)

## **28. Comment**

Sunoco has not provided proof of rerouting away from easement. To protect citizens, woodlands, or surface waters, commercial property.

Question 2 Sunoco did not answer

Question 3 Sunoco did not answer

Question 4 Sunoco did not answer

Question 5 Sunoco knew of the public Aquafier. But did not bother to look into the HDD effects it would have on our water supply.

This is unacceptable behavior for a public utility which you call it. To not take into account the citizens of Pennsylvania whose lives and water supplies are threatened. The permits should never have been issued in the first place. Do your Job and protect our water and environment. Sunoco is making you look like fools. (32)