

DEP South-Central Regional Office
Waterways and Wetlands Program
909 Elmerton Ave.
Harrisburg, PA, 17110

To Whom It May Concern:

As an active conservationist and naturalist from York Springs, Pennsylvania, I am writing this letter to express my concerns regarding the environmental impacts of Sunoco Logistics' Mariner East II pipeline (Mariner II), also known as the Pennsylvania Pipeline Project (PPP). The Mariner II is planned to be a 306 mile long pipeline for carrying liquid natural gas product (LNG) from the gas rich Marcellus Shale region of Pennsylvania and Ohio to ports at Marcus Hook, Delaware County, Pennsylvania. To begin construction on this project, Sunoco must obtain their Chapter 102 permit for sediment and erosion control, and their Chapter 105 permits for disrupting wetlands. This is a brief statement containing my primary concerns regarding this project receiving these permits.

Water quality should be of paramount concern when considering whether to grant these permits. Along its route, the pipeline will cross 1,227 streams and 581 wetlands areas, including sections of the Middle Creek Wildlife Management Area, which is an Important Bird Area. In total, over 35 acres of wetland and 8.6 acres of riparian land along streams will be permanently impacted.

When confronted with a wetland area or stream, a crossing must be performed. Two methods will comprise 91.5 percent of total crossings on the Mariner II. The first, and most disruptive method, is an open cut. Using this method, a trench is dug straight-through the wetland like would be done on dry ground and the pipeline is laid. This method is extremely disruptive to wetland hydrology and native flora. It also provides a disturbance, which is an excellent opportunity for invasive species to take hold. Invasive seed can easily be introduced into the wetlands via the heavy equipment required in the digging procedure. Under the current proposal, the open cut method would be used in 74.5 percent of wetland and stream crossings on the Mariner II project.

Another 17 percent of wetland and stream crossings performed during the construction of the Mariner II, would be done using horizontal direction drilling (HDD). HDD bores a tunnel under wetlands instead of trenching through them, causing considerably less disruption to the impacted area. Wetlands should always be impacted with great care, because they are extremely biodiverse, and act to preserve water quality by filtering out pollutants. Given the decreased impact to wetlands that HDD causes, it seems like plain common sense to use HDD instead of the open cut method if and whenever possible. HDD is more expensive than an open cut, but it is imperative that we protect our natural resources, especially our waterways, as we move forward in developing our natural gas infrastructure.

One issue that should be of concern is Sunoco Logistics' history of disregarding Pennsylvania's environmental regulations. In 2015, at least 42 citations were issued by the Pennsylvania Department of Environmental Protection for work being done on

the Mariner East I pipeline project. With such a poor record of compliance with environmental regulations, why should they be allowed to continue to expand their infrastructure when they can't even maintain what they currently operate in an environmentally safe manner?

Sunoco Logistics' pipelines have proven to be unsafe and a number of their lines have ruptured over the years causing damage to the environment. One leak in 2005 unleashed 260,000 gallons of crude oil into the Ohio and Kentucky Rivers. In 2008, an improperly installed valve caused 12,000 gallons of gasoline to be spilled into Turtle Creek, Westmoreland County Pennsylvania, killing most of the aquatic life along a three mile section of the stream. And yet another spill in Wellington Ohio, resulted in 2,780 gallons of gasoline being spilled and 30 homes having to be evacuated. If the Mariner II were to rupture along one of the more populated sections of its route, such as the Philadelphia suburbs or the Cumberland Valley, it would be devastating to not only the environment, but also the economy.

As you continue to discuss whether to grant Sunoco Logistics these permits or not, please take a moment to reflect on the words of Article 1 Section 27 of Pennsylvania's Constitution, which states.....

"The People have the right to clean air, pure water; and to the preservation of the natural, scenic, historic, and esthetic values of the environment. Pennsylvania's natural resources are the common property of all people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people."

After reviewing all the comments and testimony for this case, you must decide for yourself; can this project go forward while still protecting the constitutionally insured right of the people to a healthy environment? If you are like me and believe that this project poses a clear threat to our Article 1 Section 27 rights, take a stand and oppose Sunoco Logistics' chapters 102 and 105 applications. It is your duty to the citizens of this Commonwealth.

Sincerely,

Eli DePaulis

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"A true conservationist is one who knows that their world is not inherited from their father, but borrowed from their children."

-John James Audubon