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To Whom it may Concern:

The following are my comments regarding Sunoco Logistics LP's Mariner II/Pennsylvania Pipeline Project 102 NOI under Pennsylvania's Erosion and Sediment Control Act.

Although the proposed pipeline project traverses the length of Pennsylvania Sunoco Logistics LP has submitted individual site plans. Permit approval should be based up the entire project as laid out in their narrative instead of individual parcels. Therefore, Sunoco Logistics LP (Energy Transfer Partners) should be required to file an NPDES in addition to the 102 NOI as per the Federal Clean Water Act and the Pennsylvania Clean Streams Law.

Even before calculating the project size below it is apparent that the total project size greatly exceeds minimum land disturbance size of each of the aforementioned. Plus, by Sunoco's own disclosure in their project description they admit to the immensity of this proposed project. *"The project involves the installation of approximately two parallel pipelines within a 306-mile, 50-foot-wide right-of-way (ROW) from Houston, Washington County, Pennsylvania (PA) to SPLP's Marcus Hook facility in Delaware County, PA."*

Using Sunoco's numbers it didn't take long to calculate the following: The project will impact 80,784,000.00 ft² which is 2.90 mi² or 1856.00 acres of disturbance along the length of this 306 mile-long project. However, the disturbance area does not stop there considering that many of the ROW agreements include an additional temporary 25 ft. of working staging area space directly adjacent to the 50 ft. ROW which equals to 75 ft. wide area of disturbance, not 50ft wide, as indicated in the application. Also in many cases this 75 ft. wide ROW extends up to or past streambanks. In addition, Sunoco will be doing open cuts across hundreds of waterways along the entire length of this project. There will be increasing potential for something to go wrong with each open cut across all of the streams. A few impacted streams might result in little to no consequences but hundreds could lead to cumulative impacts that end up damaging both smaller and larger bodies of water through sedimentation, streambank failure and the resulting effects on main bodies of water that could cost thousands of Pennsylvanians dependent upon these waterways for their daily needs.

Other problems with their 102 NOI application. Sunoco and their consultants have failed to correctly identify the majority of the watersheds in counties of south-central PA on the pages titled SUMMARY TABLE FOR SUPPORTING CALCULATION AND MEASUREMENT DATA including Berks, Blair, Cumberland, Dauphin, Huntingdon, Lebanon, Lancaster and York that could potentially be impacted by their activities. Instead they have given each location an obtuse name, usually a road and in some cases municipalities, located as much as 3.5 miles away. These are inaccuracies that cause difficulty for reviewers both government and public alike to correctly identify site locations so that educated comments can be provided based on available information unless they have access to accurate maps or GIS files. Please note the following comments regarding errors in naming Cumberland County watersheds:

- page 13. **Watershed Name:** Plainfield Cumberland. Plainfield is actually a small borough located 3.5 miles south of the proposed pipeline location not a waterbody or watershed
- page 13. **Watershed Name:** Creek Rd. Cumberland There are actually several Creek Roads located in different areas of Cumberland County. The correct Creek road should be identified.

- page 13. **Watershed Name:** Wolf Bridge DA1- Cumberland. road name not the watershed or water body
- page 13. **Watershed Name:** Wolf Bridge DA2- Cumberland. road name not the watershed or water body. I also question why there are two Wolf Bridges
- page 13. **Watershed Name:** Middlesex Cumberland. Municipality name not watershed or waterbody
- page 13. **Watershed Name:** Arcona Cumberland County. The Pipeline crosses an Arcona road but the waterbody impacted is two (2) miles to the east of the road and does not have that name.

The page numbers used above are not in error since there are multiple pages 13 and 14 in this document. All of the inaccuracies regarding watersheds should be corrected to denote the actual creek or stream watershed name.

This application also lacks sufficient information as to locations of the numerous waterways listed in the Receiving Waters Table (attachment 3) that could potentially be impacted by open cuts across waterways. Each tributary should have its own designation not for example unnamed tributary to Conodoguinet (3). There should also be accompanying maps clearly labeled with each tributary/stream name so as to clarify where each is located.

Along this same line of thinking Sunoco should not be granted an exception under section 102.14(d)(1)(ix) nor a waiver under 102.14(d)(2)(ii). They should be held fully responsible and accountable for any damage that could result from their planned activities. Also they should specifically clarify what **“to the extent practicable”** entails since it is used repeatedly throughout the length of their NOI regarding potential impacts to forested areas and other stream crossings. Any time an open cut is performed the risk of sedimentation increases especially if something should go wrong either during the process or afterward. What if an extreme precipitation or other weather event should occur during the period of time they are working at any of the stream crossing locations? How would they guarantee that they could minimize or prevent sedimentation or other forms of pollution to PA waterways resulting from that type of event?

This could easily happen to at least one location I mentioned in my 105 comments: As stated their site plan depicts an open cut through a roughly 300m long streambed/wetland. Approximately half of this open cut will repeatedly take place within ~150 meters of the existing streambed so that the ME2 pipeline can be laid alongside the existing ME1 (see attached map). Although Sunoco plans to do stream restoration work there I highly question the open cut crossing method planned at this site based on the orientation of the pipeline in conjunction with the streambed, stream flow, floodplain area and other on-site characteristics. It is guaranteed that normal annual processes combined with future expected heavy precipitation and or more extreme weather events, will ultimately result in washout of streambed materials over time, future sedimentation events and eventual exposure of pipeline. In this case an HDD bore is the only intelligent and correct option).

Additional comments regarding: Attachment 6 Riparian Buffer Waiver Request; Pennsylvania Pipeline Project South Central Region: Spreads 3, 4, 5

Page 3.

While it is impractical to document all the actions taken by SPLP to avoid/minimize impacts on a project of this size, the intent of this section is to provide a summary of the major actions SPLP has taken to accomplish this goal. ***It is not impractical and each and every action should be documented using supporting evidence***

The final route that was selected **minimizes environmental impacts to the maximum extent practicable** while still maintaining the project's overall constructability and ensuring a safe working environment while

also taking landowner constraints into consideration. ***Again this need to be explained in detail with supporting evidence***

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Sunoco states: "The project would significantly impact resources if HDD's were not performed to minimize impacts to resources and were instead open cut installations of the pipeline." ***Yet the majority of their water crossings are open cuts not HDDs.***

NO IMPACT ALTERNATIVE

"The No-Impact Alternative considers the potential benefits and adverse impacts if the Project were not constructed. If the Project were not constructed, one potential benefit would be the absence of environmental impacts associated with construction and operation of the Project; however, the local communities/markets in need of the natural gas liquids (NGLs) that would no longer be provided would be adversely impacted. Specifically, the purpose/need of the Project to transport low cost Marcellus Shale production to markets locally and domestically in the U.S. and to international markets would not be met. Consequently, the No-Action Alternative would likely require the use of other energy sources to satisfy the growing energy demand that would not be met by the Project. Accordingly, customers in those markets would have fewer available and likely more expensive options for obtaining natural gas supplies in the near future."

*Sunoco has yet to provide evidence as to what quantity of the gases specifically NGLs (ethane, butane and propane) they plan to transport in these pipelines would actually remain in the United States or where it would be used. Until recently Sunoco never mentioned domestic use until opposition to the pipeline pointed out that this pipeline crosses two state boundaries with a final destination of Marcus Hook for export to Europe so that Sunoco can meet contractual obligations with two European companies (INEOS and Borealis AG). Two items to note: According to recent reports from the US Energy Information Administration(EIA) there has been more than enough natural gas supplies in the northeast and the rest of the country. In fact more natural gas liquids are being exported than imported in the U.S (see attached documents "US propane exports increasing, reaching more distant markets and accompanying graph., As such I question the need for these pipelines under the premise they present under **No impact alternative.***

Thank you.

Sincerely,

Kim Van Fleet
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