

June 29, 2021

Pennsylvania Department of Environmental Protection
Southeast Region, Waterways and Wetlands Program
2 Main Street
Norristown, Pennsylvania 19401

RE: Chapter 102 Permit No. ESG0100015001 and Chapter 105 Permit No. E15-862

Dear Sir or Ma'am:

My name is retired Army Colonel Tom Magness. I am providing this letter of input as a strategic advisor for the Grow America's Infrastructure Now (GAIN) organization, and as a former executive leader with the United States Army Corps of Engineers. I have commanded Army Corps of Engineers Districts in Detroit, Los Angeles, and Afghanistan. I have extensive experience with major infrastructure projects and have myself been the final approval authority at the federal level on permit applications for large public and private sector infrastructure projects throughout my areas of responsibility. I know the process and have great respect for those making these important decisions.

This spring Sunoco Pipeline LP applied for permit amendments that would allow the company to change the construction method and routing for a final section of the Mariner East 2 Pipeline. I am writing to encourage the Pennsylvania Department of Environmental Protection (DEP) to approve the requests.

Having closely followed the development of the Mariner East 2 Pipeline, I see no reason not to approve the proposed permitting amendments. The changes will enable completion of a final section of the pipeline in a manner that adequately upholds public safety and reasonably prevents further environmental disruptions.

Over the past two decades, pipelines have improved exponentially in sophistication, technology, building and design, and operations. Public-private partnership have also helped develop and share industry best practices, which have enhanced construction, monitoring and incident-response. These advances have and continue to make pipelines, which are demonstrably the safest way to move energy products, even safer and more efficient.

The Mariner East 2 Pipeline is constructed to meet and often exceed the highest industry standards. That includes pipe resiliency testing at 125 percent of maximum operational load; minimum pipe depths that in many areas exceeds regulatory requirements; equipment and supply standards (about three-quarters of which is made in the USA); x-ray of inspection of joint welds; and security to prevent vandalism and tampering.

Equally rigorous controls have been developed to ensure the pipeline's safe operations once completed, including aerial and ground surveillance; interior cathodic monitoring devices; automated and manual stop-valves; real-time data acquisition; tools to identify pipe deterioration; centralized control centers; emergency response training; and public awareness programs.

Which is all to say, the Mariner East 2 Pipeline is designed and built to ensure public safety and preserve the integrity of surrounding land and waters against any reasonably foreseeable conditions or impacts.

Construction of the pipeline was halted last September after inadvertent returns—the escape of drilling mud to surface—were reported. These occurrences are not unusual in horizontal directional drilling, nor are they particularly damaging. The substance is a combination of bentonite clay and water, both natural elements. In fact, bentonite is found in many consumer products, including skin care and dietary items.

To prevent any further inadvertent returns, Sunoco Pipeline LP is now seeking to finish this section of the Mariner East line via open trench installation. This method requires no horizontal directional drilling, and therefore precludes any possibility of drilling mud releases. While it may cause greater surface-level disruption, moved earth will be replaced once the pipe is set, and impacted grounds will return to prior condition. Importantly, this installation method will allow the same high-level precision in the construct of the pipe as horizontal directional drilling.

Sunoco Pipeline LP's proposed routing also further ensures that in the unlikely event of an incident along the pipeline, sensitive geographies will not be affected. This too is a step "above-and-beyond" to protect local ecosystems. The route has been carefully vetted and builds on plans that were previously approved in the regulatory process.

Energy pipelines are critical to Pennsylvania's remarkable shale development. They also best serve our communities and the environment by mitigating the likelihood of failure. The primary alternatives are truck and railcar shipments, which are much more volatile. One study found that rail was more than four times more likely to experience a spill than pipelines.

The Mariner East 2 project has fully met or exceeded the necessary regulatory requirements up to this point, which should give the DEP confidence to approve the requested permitting amendments. It is in the public's interest that the pipeline be completed and that the appropriate authorizations be granted to ensure it meets the highest regulatory standards.

For these reasons, I encourage the DEP to approve Sunoco Pipeline LP's proposed permit modifications for the Mariner East 2 Pipeline. If it behooves your agency, I would welcome the opportunity to discuss this matter in greater detail with members of the DEP.

Thank you for your time and consideration.

Sincerely,

Thomas H. Magness IV
Colonel (Retired), U.S. Army Corps of Engineers
Founder, Eagle Leadership Group
Advisor, Grow America's Infrastructure Now (GAIN)