



101 Commerce Drive
Exton, Pennsylvania 19341

Tel: (610) 363-9525
www.westwhiteland.org

September 25, 2019

Richard Kanaskie, Director
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Boring for pipeline construction near Lisa Drive in West Whiteland Township

Mr. Kanaskie:

In March 2018 and January 2019, the Pennsylvania Public Utility Commission ordered Sunoco to suspend operation of the Mariner East 1 pipeline following subsidence behind Lisa Drive in West Whiteland Township. The PUC also ordered Sunoco to fill underground voids in that area with a significant amount of grout.

The subsidence occurred as a result of construction of Sunoco's Mariner East 2 pipeline installed via horizontal directional drilling (HDD), apparently near an underground fault. Because of the problems caused by HDD in that location, Sunoco (now Energy Transfer) is seeking approval from the Pennsylvania Department of Environmental Protection for a permit modification to allow Mariner East 2X to be installed via different construction methods – a combination of open trench construction and direct boring under the Route 30 bypass and Amtrak railroad. The exit pit for the boring will be located very close to the area that was grouted.

The prospect of pipeline construction so close to the grouted area that surrounds one natural gas liquid pipeline – Mariner East 1 – and is in close proximity to another – the 12" "workaround" pipeline that Energy Transfer recently put into operation – is unnerving for our community. If DEP issues the required permit and Energy Transfer prepares to begin construction of Mariner East 2X, on behalf of our residents we ask that the PUC order Energy Transfer to suspend operations of the 8" Mariner East 1 and the 12" workaround pipelines as a preemptive measure.

If our request is not granted, we would appreciate an explanation as to how pipeline construction can be approved so close to an underground fault and to a heavily grouted area without risking damage to nearby pipelines carrying natural gas liquids.

Thank you for considering our request.

West Whiteland Township
Board of Supervisors


Theresa Santalucia
Chairman


Michele Moll
Vice-Chairman


Beth Jones
Member



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Ian Woods
Community Liaison, Eastern Region
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: Corrosion control for Mariner East pipelines

Dear Mr. Woods,

We appreciate the many hours that PHMSA has spent on the Mariner East pipelines, particularly in West Whiteland Township. We are reaching out now in search of a path to information that will shed light on an issue of concern to residents.

Last month, a West Whiteland resident discovered an electrical box in a state of disrepair. The electrical box was located by the Chester County Library in Exton, PA and houses a test station from the cathodic protection system for the operating 8" and 12" Mariner East pipelines. Energy Transfer has since replaced the box, but the discovery of old equipment in such poor shape added to the community's ongoing fears about the safety of NGL pipelines so close to their homes, businesses and gathering places.

A lack of information about Sunoco/Energy Transfer's integrity management program, particularly pertaining to corrosion control, is a big part of the problem. Those of us without industry or regulatory access to information fill in the blanks as best we can, without knowing whether we are piecing together a complete picture.

For example, we know that the PA PUC's Bureau of Investigation and Enforcement's December 2018 complaint against Sunoco for the Morgantown leak included 15 counts of violations related to corrosion control, as well as a statement that there is a "statewide concern with SPLP's corrosion control program and the soundness of SPLP's engineering practices with respect to cathodic protection." On PHMSA's website, we've found that, as a result of inspections in March 2018 on a different segment of the 8" Mariner East pipeline, PHMSA issued a notice of probable violation to Sunoco for corrosion control. We know that PHMSA inspected the 8" Mariner East pipeline last year which led to the replacement of the test station referenced above (among others) and that testing was done on the 12" Mariner East pipeline before it went into operation conveying natural gas liquids. We also are aware that Energy Transfer acquired Sunoco and replaced Sunoco's corrosion control procedures with their own,

which apparently addressed the concerns about corrosion control expressed by PUC staff in the Morgantown complaint.

What we do not know is anything about the results of those inspections, whether anyone can confirm that revised corrosion control procedures have been implemented for the Mariner East pipelines in West Whiteland Township, or most importantly, whether these pipelines are safe.

The aura of inadequacy surrounding Sunoco/Energy Transfer's corrosion control – reinforced by examples like the mangled electrical box – have left our residents with deep misgivings about the safety of the current and future Mariner East pipelines. They want concrete assurances from reliable sources that effective corrosion control measures are in place now, or if not, what steps will be taken to make that a reality.

We would appreciate your help in gathering the following information:

- A brief description of the purpose of the test station by the library and whether its condition prior to the repair is an indication of the condition of the corrosion control in place on Energy Transfer's 8" and 12" pipeline segments in West Whiteland.
- A summary of the types of corrosion control measures that Energy Transfer is implementing now for the 8" and 12" pipelines in operation, and how PHMSA knows that those measures are in place.
- A summary of the results of inspections of those pipelines in West Whiteland Township, and when the inspections took place.
- A description of any different or additional corrosion control measures that Energy Transfer will put into effect for the new 16" and 20" pipelines when they are operational.

Please contact Township Manager, Mimi Gleason, at mgleason@westwhiteland.org or 610-363-1760 with any information you can provide. Thank you in advance for your assistance.

Sincerely,

West Whiteland Township
Board of Supervisors


Theresa Santalucia
Chairman


Michele Moll
Vice-Chairman


Beth Jones
Member