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HUMAN SERVICES

DATE: May 20, 2021  
TO: Pennsylvania Department of Environmental Protection  
[ra-eppipelines@pa.gov](mailto:ra-eppipelines@pa.gov)  
RE: Public Comment – HDD Reevaluation Report,  
Biddle Drive/Devon Drive/Shoen Road Crossing  
PADEP SECTION 105 PERMIT NO. E15-862  
PA-CH-0199.000-RD (SPLP HDD No. S3-0360)

Please accept for the public record these comments on the additional documents and appendices released by the DEP in May 2021, for Sunoco LP/Energy Transfer’s HDD-360 (Biddle Crossing/Devon Drive/Shoen Road) 20-inch line re-evaluation.

In [public comments submitted to the DEP on October 23, 2020](#) for the same HDD-360 site, I raised concerns about impacts to public health, safety, private property, the environment, and the waters of the Commonwealth. Unfortunately, nothing in the newly released documents addresses or alleviates these concerns. New geotechnical borings cited in the updated reports are outside the proposed path of the 20-inch line. There is no new information to resolve ongoing concerns about impacts to the aquifer; the prevention or mitigation of “seeps” at 103 Shoen Road or other private properties; or prevention and mitigation of inadvertent returns. The questions posed in my October 2020 comment remain: How will this situation be managed long term? Where will the water pop up when Sunoco drills a new pilot hole? How many more homeowners will be impacted?

Since June 2017, each time drilling has resumed at this site, the same issues with groundwater discharge, “seeps,” and inadvertent returns have continued. Neither the original drilling analysis for HDD-360 nor the newly available documents address any plan for preventing the discharge of 250,000 gallons per day of pristine groundwater, or any solution or mitigation other than hauling it away in tankers to be dumped as industrial waste.

The new documents fail to resolve the conflicts and contradictions between the findings of Sunoco’s September 2017 hydrogeological survey and their 2020 drilling analysis. There is also nothing in the new reports to alleviate concerns about subsidence incidents.

As I noted in October 2020, in addition to the inconsistencies in the reports that have been submitted on this site, according to USGS, land subsidence occurs when large amounts of groundwater have been withdrawn from certain types of rocks, such as fine-grained sediments. The rock compacts because the water is partly responsible for holding the ground up. When the water is withdrawn, the rock falls in on

itself. Excessive pumping of aquifer systems has resulted in permanent subsidence and related ground failures. In some systems, when large amounts of water are pumped, the subsoil compacts, thus reducing in size and number the open pore spaces in the soil the previously held water.

As the Department is aware, land subsidence poses risk of catastrophic failure in pipelines, with hillside locations being particularly vulnerable as evidenced in the September 2018 explosion of the Revolution Pipeline in Beaver County, PA, which caused a massive fireball, engulfing a home and burning section of land over 500 feet from the site of subsidence. In the heart of Exton, Chester County, a similar incident would cause catastrophic loss of life and property. As you are also aware, this area has been plagued with land subsidence events that have caused five families to have to move away from their homes and neighborhood at Lisa Drive in Exton. Route 30, one of Chester County's busiest thoroughfares, has had more than a dozen land subsidence events since June of 2020.

Along with the land subsidence issues in West Whiteland township, very close to this specific drilling location, nearby East Goshen township is currently investigating a subsidence "feature" revealed in a recent whistleblower report near the Bow Tree Development and HDD location. A subsidence feature was discovered in a wetland during the Marsh Creek spill clean-up in August 2020, and more land subsidence features were reported in nearby Upper Uwchlan Township and Wallace Township in October 2020. The one thing all these features have in common is that they are in the path of the Mariner East Pipeline creating additional risk to our local communities.

In addition to continued concerns about land subsidence in and around Chester County related to the Mariner project, I have serious concerns about the reliability of the information provided to DEP by Sunoco LLP/Energy Transfer and their contracting partners. Last year's whistleblower report by a licensed professional geologist raised suspicion and concern about the systemic suppression of vital geologic information by this operator. This most recent claim adds to the doubt that has already been cast by a weld inspector pleading guilty to falsifying weld reports on this project in Western PA. A pattern of disregard for the law, our regulations, public safety, or private property rights demands the question: Why should we trust the information provided by this operator on this project?

This operator has proven to be neither reliable nor trustworthy, and this project is neither safe nor suitable for a residential area. I hope the DEP will consider the above factors and the comments of other public stakeholders in its review of these most recent additions to Sunoco's HDD-360 report.

Sincerely,



Danielle Friel Otten  
State Representative  
155th Legislative District