

- Non standard, not recognized as industry standard
- Drilling in close proximity to other utility that could be struck.
- Creating voids and causing geology to change, threatening ground stability.
- Drill operators not experienced or familiar enough (certified?) to steer drill properly.

B. Coating, integrity and weld issues

- Coating Damage during pull back
- “Coating issues”, causing SPLP to dig up and replace segments in five counties.
- Coating sitting out far longer than recommended and is compromising the integrity of the coating, therefore questioning the safety of the pipelines.
- Susceptible to stress corrosion cracking and possible cryogenic embrittlement.
- Multiple leaks on Mariner 1 which could have been avoided.
- SPLP/ET’s corrosion control and maintenance of buried pipelines. In addition to their maintenance responsibilities, there are questions of potential cathodic shielding to the buried pipes.

C. Sunoco’s egregious behavior, disregard for safety and their violations and other complaints.

The newest one being from BI&E, strengthening my concerns and allegations. Additionally, there is currently a criminal investigation opened by our county DA. SPLP’s actions and inactions have put the public at great risk and simply admitting mistakes and promising to ” do better” is not how public safety is upheld.

D. Lack of adequate emergency planning and public awareness now 4 years into operations and forcing our municipalities, counties and state out of compliance with our Health and Safety

Statute, Title 35. The public is not informed or prepared with how to deal with a Mariner East Pipeline failure. SPLP continues to ignore requests for information and is now even excluding entities who have involved themselves with PUC complaints from informative meetings.

E. Pipeline installation in potentially unstable soil.

- Multiple sinkholes
- Revolution Pipeline explosion
- Inadequate studies and common sense decisions.

F. Pipeline reversal and repurposing is contrary to PHMSA guidelines is disregard for safety. These ancient lines were not built to withstand this commodity or pressure. Mr. Metro stated that himself in a testimony.

Consolidation of Cases

I am open to consolidate with the other pro se complainants if consolidation must take place. Prior to a decision to settle, I was in favor of consolidation with the BI&E complaint but seems to no longer make sense. Please reference my answer to Sunoco's motion to consolidate for my opinion and information regarding consolidation of all complaints.

Petitions to Intervene

Thomas Casey

Virginia Marcille-Kerslake

Witnesses

My list of potential expert witnesses:

Paul Metro & Sunil Patel - BI&E/Pipeline Safety

These two gentleman have knowledge of pipeline integrity, pipeline safety, the Mariner East Pipeline system, and have knowledge of past incidents/violations that have occurred.

Mehrooz Zamanzadeh (Dr. Zee) Matergenics

(412) 788-1263

NACE CERTIFIED CORROSION/MATERIALS SELECTION/DESIGN/COATING/CP
SPECIALIST

William Turner - Deputy Director of Chester County Department of Emergency Services

Knowledge of emergency response and planning and has been very involved in planning for Mariner East and meetings regarding regarding the safety of it.

Seth Kovnat - Senior Structural Engineer

(215) 939-8422

Mr. Kovnat can testify to structural stability and the properties of hazardous/explosive materials.

List of potential witnesses:

Margret Egan - Principal of Saints Peter & Paul School. Mrs. Egan can testify to the past and current emergency plans for the school and the information given by the respondent over the last four years.

Kevin Miller - East Goshen Emergency Management Coordinator

Mr. Miller can testify to our township's plans for emergency, evacuation and response. Additionally, he can speak for information received from Sunoco. As West Whiteland's Fire Chief, he could potentially give expert testimony on responding to a pipeline emergency and/or explosion.

Caroline Hughes can testify to the lack of knowledge that Saints Peter & Paul had/has from SPLP, as a fellow safety committee member during the summer of 2017 and a fellow mother of a student.

Given that issues can change and have in the past, I continue to reserve the right to change or call additional expert witnesses for pipeline integrity, pipeline safety, emergency response and anything else that will help prove my concerns in the future.

Site Visits

It is my understanding that site visits are an option and up to her honor, Judge Barnes, to possibly visit the area of concern. The opportunity for her honor to come to East Goshen Township and visit Saints Peter and Paul School would be greatly appreciated and very beneficial/informative in this matter.

Discovery

I am prepared to submit my interrogatory requests and subpoenas for discovery. Assuming that the respondent will be cooperative, I believe it shouldn't take long.

Procedural Schedule

I will cooperate with Judge Barnes and the other Parties (if consolidated) to create a reasonable procedural schedule for this matter.

Settlement

. I am willing to participate in settlement discussions that may arise during the pendency of this matter.

Respectfully Submitted,

Melissa DiBernardino

April 19, 2019