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Subject: **Docket No. E-2019-3010267. ANOPR**
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Thank you for soliciting input on the present Commission pipeline safety regulations. My comments are based on my experience as the Chairman of the Southeastern Pennsylvania Sierra Club's Pipeline Committee for five years and as a founding member of East Goshen Safety and Environmental Advocates. In addition I have been a resident of East Goshen Township for over 19 years and have been closely following the construction of Mariner East 2 and 2X as well as the repurposing of Mariner East 1.

The following areas will be the subject of my comments.

1. Valves. There has been a considerable controversy in my region of the need for a safety valve along Boot Road near highway 202. Initially an agreement was reached between Sunoco Logistics and West Goshen Township that a safety valve would be placed on Sunoco's property just west of 202. Subsequently the pipeline operator stated that they were going to place the valve on the property they had purchased just east of 202. When West Goshen Township objected Sunoco concluded that this safety valve wasn't necessary and would be eliminated entirely.

This approach to a feature as important as a safety valve which could automatically shut off flow if an accident occurred does not instill confidence in local residents. The PUC should establish strict regulations regarding the spacing of safety valves along pipelines carrying natural gas liquids (NGLs) in high consequence areas such as the one I live in.

2. Construction compliance. Sunoco has been cited for numerous construction violations leading to more than \$13 million in fines and several mandated halts in construction. There must be more effective measures than fines and temporary halts if there are many egregious violations. When is enough enough? Regulations should be developed that provide for a mandatory halt in construction together with a comprehensive review of the construction process to determine if the pipeline operator can safely and efficiently construct this pipeline. A high standard should be set.

3. Utility interactions with local officials. Sunoco has never established a satisfactory relationship with many townships. They have not been responsive to inquiries from local officials e.g. need for meetings without being penalized in any way. This should not be tolerated. Mandatory meetings need to be part of the construction plans and if the operator does not attend there should be serious consequences.

4. Public awareness meetings. These meetings should be held at frequent intervals and have a set agenda which include a discussion of the risks residents will be exposed to as a result of the pipeline, how they will be minimized and carefully detailed plans on how residents will be notified in case of an accident and what they are to do. This includes meeting with school districts, all impacted townships, and all emergency services.

5. Regulation of horizontal directional drilling. This has been a serious problem in Chester County leading to contamination of private wells, far too many inadvertent returns, numerous sinkholes and exposure of an adjacent pipeline on at least 2 occasions. This should never be tolerated. If the characteristics of the geology are such as to lead to this type of result than a different route and /or different construction methods being mandated. Continuous attempts with the same result should never be permitted.

6. Protection of public and private water wells and supplies. No construction should be permitted before the location of all private wells is confirmed and all necessary precautions have been taken to protect water supplies particularly if the geology is suspect. If any contamination occurs it should be mandated that construction be immediately halted and necessary arrangements be made to prevent recurrences. There should be zero tolerance in this regard.

We have suffered through over 2 years of construction errors, violations and indifference from the Mariner East pipeline operator. Clear cut stringent enforceable regulations could have prevented many of the problems. A poorly constructed pipeline if allowed to operate can entail numerous safety risks for

generations to come.

**Respectfully submitted. Bernard Greenberg MD. 894 Jefferson Way West
Chester PA 19380.**

[Faint handwritten mark]

Sent from my iPad

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