

Ed Gillette, Operating Engineers Local 542

**Secretary Bureau
Pennsylvania PUC
Commonwealth Keystone Building - 2nd Floor
400 North Street
Harrisburg PA 17120**

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Docket: L-2019-3010267

To the Pennsylvania Public Utilities Commission:

Thank you for the opportunity to provide comment on the Commission's Advance Notice of Proposed Rulemaking Order (ANPRO) that proposes to potentially further regulate Pennsylvania's oil and natural gas pipelines.

Pipelines are critical to our state's energy security and economic growth. The oil and natural gas industry supports more than 322,000 jobs and nearly \$23 billion in wages throughout Pennsylvania, and prudent development has established the Keystone State as the second largest natural gas producer, behind only Texas. Today, oil and gas contribute nearly \$44.5 billion to our state's economy, according to research by the American Petroleum Institute.

Because energy production and transportation have such a large impact on businesses and families, it is imperative that Pennsylvania's regulatory process be appropriately rigorous to protect our communities and the integrity of our lands and waters, but that it not add unnecessary burdens that would discourage continued growth.

Evidence shows pipelines are the safest and most effective mode to move energy products, and public-private partnerships are helping to make them even more reliable. The Mariner East I and II pipelines are good examples of a balanced regulatory framework helping to bring online new capacity that implements new technologies and safety measures.

It's worth noting that the Mariner East pipelines are designed to mitigate risks to Pennsylvania's surface waters and aquifers. In many instances, the projects not only meet but exceed regulatory requirements.

The pipes are built from materials that exceed federal density standards, which are then pressure tested well above operational levels. In many sensitive areas, the lines are buried deeper than required to add further barriers between bodies of water. The pipes themselves are treated with a cathodic coating, which prevents rusting and erosion.

During operation, the Mariner East pipelines will employ "smart pigs," internal pressure monitors, and a Supervisory Control and Data Acquisition (SCADA) system that provides real-time data from within the line and can even shut down the line automatically. These technologies ensure that in the unlikely event of an incident, responses will be immediate and effectual to prevent contamination of surrounding land and water.

To minimize environmental impacts, the Mariner East pipelines employ horizontal directional drilling, a technology that allows builders to install pipes underground with little surface disruption. There has

been criticism of inadvertent returns – a process in which the bentonite drilling clay seeps back to the surface. However, such occurrences are not uncommon, nor do they pose any long-term hazards to ground water.

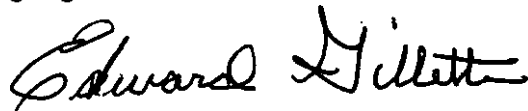
In many ways, and especially in regard to water safety, Mariner East is a model of infrastructure that complies with, and frequently exceeds, an appropriately rigorous regulatory framework. It would be not only unnecessary, but possibly counterproductive, to add even greater requirements for future pipeline projects. Regulation often fails to keep pace with technological advances, and by trying to micro-manage every conceivable outcome, authorities risk creating a thicket of rules and requirements that prevents new systems and protocols from coming online.

To say that the current regulations are not adequate shows a lack of understanding of the current regulations altogether. Pennsylvania must increase development of its pipeline infrastructure to ensure community safety and increasing regulations only discourages needed investments. Because pipelines are safer than alternative transportation means, heightened regulations could also have an adverse impact on community safety.

Energy infrastructure is a critical piece of our economy. Projects like the Mariner East demonstrate that public safety and the sanctity of our lands and waters are a priority for developers, who share a vested interest in the areas they serve. For those reasons, I encourage the Commission to refrain from adding “more comprehensive” regulations on Pennsylvania’s energy producers and transporters.

Edward Gillette, Jr.

Operating Engineers Local 542

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