

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Meghan Flynn	:	C-2018-3006116
Rosemary Fuller	:	P-2018-3006117
Michael Walsh	:	
Nancy Harkins	:	
Gerald McMullen	:	
Caroline Hughes and Melissa Haines	:	
Andover Homeowners Association	:	C-2018-3003605
Melissa DiBernardino	:	C-2018-3005025
Rebecca Britton	:	C-2019-3006898
Laura Obenski	:	C-2019-3006905
v.	:	
Sunoco Pipeline, L.P.	:	

MAIN BRIEF OF VIRGINIA MARCILLE-KERSLAKE

Dated: December 16, 2020

In February 2019, I filed a petition to intervene in the formal complaint brought forward by Melissa DiBernardino against Sunoco Pipeline which subsequently became consolidated with aligned formal complaints from residents of Chester and Delaware counties.

As stated in my petition to intervene, I live in West Whiteland Township, Chester County in the potential impact zone of Mariner East. Mariner East 1, 2, 2X and the 12” line pass within 250 feet of our home. There is an HDD drill site across the road from my house. There is water flowing underground on our property along Mariner East 1 as a result of HDD drilling activities, compounding our concerns for the integrity of the eighty plus year old pipe.

I filed the petition to intervene because Mariner East puts my family, my neighbors and my community at heightened risk. This unacceptable and unmitigated safety concern which has been

forced upon us is shared by the other complainants and the school districts, townships and counties which have intervened in this consolidated complaint.

Over the course of weeks of hearings we heard testimony presented by lay and expert witnesses for the complainants providing overwhelming evidence to support these concerns. The complainants and legal teams for the other intervenors will be presenting the findings of fact and legal arguments. I will not attempt to duplicate those efforts here as a layperson nor burden the court unnecessarily.

I do, however, wish to take this opportunity to state that these proceedings have only served to increase my grave concerns for the condition of the aged 8” and 12” Mariner East pipes, the lack of public awareness and emergency preparedness with regards to Mariner East and the impossibility of evacuating our high consequence areas, particularly the most vulnerable members of our communities – children, elders and those with special needs.

As a member of a high consequence community put at risk by this project, I repeat the request that the operation of the Mariner East 1 and the cobbled together Mariner East 2 “workaround”, and construction of the Mariner East 2 and 2x be halted immediately, until credible and practical emergency plans are in place, and a thorough independent end-of-life study is performed on the 8” and the 12” lines. Based on the evidence from the hearings in this matter , it is clear that Mariner East poses a serious risk of death to those who live, work, shop, and play in the communities along the right-of-way.

Respectfully Submitted,

Virginia Marcille-Kerslake, Pro Se

December 16, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have served this main brief upon those listed on the attached service list.

Date: December 16, 2020

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