



As a resident impacted by the Mariner East pipeline construction, I have been compelled to document numerous egregious violations committed by Energy Transfer for the past 7 years. This was necessary to defend our families, communities and environment. Because the new HVL regulations only represent the bare essential requirements necessary, they must be scrupulously upheld. The new HVL pipeline safety regulations are essential to the health, safety and well being of our affected fence-line communities and our environment.

After having endured the construction nightmare of the Mariner East Pipeline for 7 years we must now cope with the realization that we are residing, working, shopping, and for all intents and purposes literally living within the blast zone of the preexisting HVL pipelines, the designs of which under the new proposals are prohibited.

For those of us living within the blast zone an experience as natural as observing morning fog will now and forever provoke alarm and, as a consequence, anxiety and fear. This is because the probability exists this is not just fog observed but possibly an HVL pipeline leak creeping into our community.

Accordingly the following proposed requirements must be upheld:

1. The new pipeline spacing regulation requiring a minimum of 12 inches distance between the outside of the pipe and the edge of any other underground structure is crucial. We have already witnessed and must now coexist with Mariner East pipes actually lying upon each other (Please reference the photos below) with minute "spacers", now proposed to be impermissible, to prevent the metal pipes from rubbing and scraping together during HDD pipe "pull back" operations and pipeline construction.
2. The recommended enhanced geological and environmental studies for pipelines with a diameter 8 inches or greater, a bore depth greater than 10 feet, or pipeline length greater than 250 feet, must require the operator to conduct an analysis of geological and environmental impact. This is a minimal requirement to offer some protection to our environmental resources, especially our aquifers and drinking water .
3. The enhancements to public notification for commencement of drilling and contingency plan are also essential for aquifer, groundwater and drinking water protection. The operator must develop a written preparedness, prevention, and contingency plan for potential impacts from drilling fluid discharges, potential possible contamination of public and private water supplies, and issues presented by conducting the underground mining particularly on karst terrain.
4. Prohibiting pipelines from being constructed or relocated under any building or dwelling is indispensable. No one should ever have to assume the risk of having these highly explosive pipelines under their homes, school buildings, workplaces, etc.
5. Protecting valve stations adjacent to roadways is categorically imperative. Vehicle barriers must be installed at above-ground valve stations adjacent to a roadway, unless there is a natural barrier. Despite being necessary even this new requirement falls short of adequately protecting vulnerable existing valve stations which presently relegate community members to "sitting ducks" from a catastrophic pipeline incident due to a vehicular accident. Just 2 weeks ago in Middletown Township, Delaware County a vehicle struck an above ground pipeline portion of a PECO natural gas line causing the shutdown of a highly traveled roadway and diverting school buses

transporting children home from school. That incident was certainly a wake up call to the community and should have been to ET to the risk involving unprotected valve stations. If the pipe had been transporting HVLs instead of natural gas, there would have been a very different scenario with a very probable catastrophic outcome.

6. The cathodic protection guidelines to have written procedures for the design, installation, operation and maintenance of cathodic protection systems is a basic requirement needed to prevent pipeline corrosion and leaks. We have already witnessed cathodic protection failures with the new ME2 and ME2X pipes needing to be repaired in Delaware County on the property of a senior living community, reportedly due to corrosion issues.
7. Promoting increased transparency of the oil and gas industry and enlisting enhanced public notification regulation is essential. This would require the pipeline operator to provide updated information to the affected public at least twice a year, including a warning that a leak from the hazardous liquid pipeline can cause property damage, personal injury, burns, asphyxiation, or death, or any combination of aforementioned. Additionally twice-yearly messages to emergency responders are required, and to public officials annually, or more frequently as needed, must be mandated. Again this is a minimal requirement to promote transparency and provide education in order to assist with protecting the fence-line communities and first responders. The first responders must be fully informed, trained, and equipped in the event of an HVL pipeline emergency. What are ET's current emergency rescue plans in the event of a pipeline accident and leak? Having residents run upwind on foot ?
8. The most recent revision of the regulations drafted by the PA PUC no longer requiring land agents to hold a valid Pennsylvania professional license in one of the following professions: attorney, real estate salesperson, real estate broker, professional engineer, professional land surveyor or professional geologist in the initial rulemaking is very disturbing. This regulation revision will certainly promote unethical and unprofessional practices dealing and communicating with affected landowners in the future without landowner recourse. The prerequisite for holding a professional license should be reinstated to encourage ethical business practices and landowner protection.

We, as residents, had to stand by as our aquifers became contaminated and endure our houses shaking and vibrating day after day, month after month from HDD pipeline construction operations. Our communities were overtaken by an incursion of heavy construction vehicles in addition to the high decibel noise from endless suck trucks removing our breached aquifer water 24/7 continually for months. We were subjected to toxic fumes, excessive noise levels and earthquake equivalent vibrations which were endless. We observed sinkhole after sinkhole appear during the HDD operations and even post construction. These sinkholes opened up a few feet to within inches from the 90 plus year old antique ME1 and "Frankenpipes". These antiquated pipes contained HVL products in the same easement as the Mariner East 2 and 2X pipe installations. We legitimately feared for our families, neighbors, and community's safety as well as our private property.

Having endured this trauma we sincerely thank the PA PUC for listening to affected community members, taking action and proposing these long overdue pipeline safety enhancements, which now must be upheld.

With this final ruling, public utilities transporting hazardous materials via pipeline will have specific, particular Pennsylvania safety reporting standards to meet in addition to those required by federal PHMSA regulations.

The PA Independent Regulatory Review Commission must now uphold these well reasoned regulations to establish minimal protection for our environment and our communities' safety, health and wellbeing.

Thank you for this opportunity to provide public comment.

Lora Snyder

Resident of Edgmont Township, Delaware County



Mariner East pipelines lying dangerously close to each other during pipe "pull back" at Glen Riddle Apartments in Middletown Township.

Photo credits: Lora Snyder



Mariner East pipelines lying next to each other within a casing in Edgmont Township after HDD pipe “pull back”.

Photo credits: Lora Snyder