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December 16, 2020
(Via PUC Electronic Filing)

Rosemary Chiavetta, Secretary
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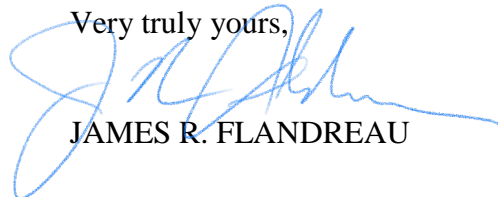
RE: Flynn et al. v. Sunoco; Docket Nos. C-2018-3006116, P-2018-3006117

Dear Secretary Chiavetta:

Pursuant to Judge Barnes' Order, please be advised that on this date I have served a copy of Intervenor, Middletown Township's Post-Hearing Brief upon counsel in the above referenced proceeding filed with the Commission today.

If there are any questions, please contact me.

Very truly yours,



JAMES R. FLANDREAU

JRF:cmc
Enclosure

cc: The Hon. Elizabeth Branes, Pennsylvania Public Utility Commission (w/ enc.)
Service List (w/ enc.)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

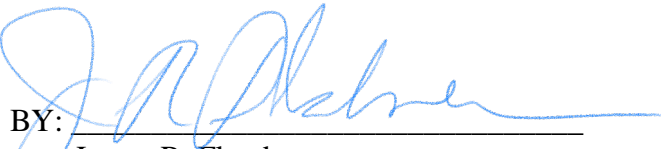
In Re: Meghan Flynn, Rosemary Fuller	:	
Michael Walsh, Nancy Harkins, Gerald	:	Docket No. C-2018-3006116
McMullen, Caroline Hughes and	:	
Melissa Haines	:	Docket No. P-2018-3006117
Petitioner,	:	
	:	
v.	:	
	:	
Sunoco Pipeline, L.P.,	:	
	:	
Respondent.	:	

POST HEARING BRIEF OF INTERVENOR MIDDLETOWN TOWNSHIP¹

Intervenor, Middletown Township respectfully submits this Post-Hearing Brief pursuant to the Order dated October 23, 2020, and in accordance with 52 Pa. Code § 5.501.

Respectfully submitted,

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Dated: December 16, 2020

¹ The Intervenor incorporates herein the post-hearing submissions of the Flynn Complainants, the *Pro Se* Plaintiffs and all parties deemed aligned with them.

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I. INTRODUCTION

Intervenor, Middletown Township (“Middletown”) is a township in Delaware County, Pennsylvania, approximately 13.47 square miles in area with an approximate population of 16,000 seeking relief for the benefit of thousands of residents placed at an admitted risk as a result of Sunoco’s pipeline operations throughout the Township. Sunoco’s pipelines cross or are proposed to cross the entire length of Middletown Township. Specifically, the pipelines run the length of Middletown Township from Edgmont Township at the North boundary to Aston Township at the South boundary. Additionally, there are four Horizontal Directional Drills (“HDD”) located in the Township: the 591 at Sleighton/Valley Road; the 610 at Baltimore Pike/State Police; the 620 at Riddlewood Tunbridge now converted to a direct pipe, conventional bore and open cut by virtue of a major permit modification issued by the Department of Environmental Protection; and the 631 at Gun Club/Chester Creek in Aston. Sunoco chose to locate its pipeline facilities using existing and acquired easements that traverse densely populated areas in Middletown including residential areas, senior life care centers, businesses, and public parks. Those at risk include students at Glenwood Elementary School, as the pipeline is located approximately 600 feet from the western boundary of the Glenwood Elementary School and 900 feet from the Glenwood Elementary School building. Additionally, there is a valve station located immediately behind Glenwood Elementary School. Middletown intervened in these proceedings to address the health and wellbeing of its residents and to demand greater efforts on the part of Sunoco Pipeline, L.P. (“Sunoco”) to enhance communications and education in Middletown.

Further, as set forth in the direct written testimony of Mark Kirchgasser filed on January 15, 2020, there have been numerous incidents in Middletown, resulting from issues with the pipeline system, that placed the wellbeing of the residents of Middletown at specific risk of harm:

- A. On May 21, 2018, a recently installed and inactive section of ME2 (as defined below) was struck by a backhoe operated by a subcontractor of Aqua America because Aqua and Sunoco failed to ascertain the correct location of the pipeline. Middletown was never directly contacted by Sunoco about the incident. Middletown forwarded letters to Governor Wolf and Gladys Brown, the Chairperson of the Public Utility Commission detailing the incident on June 14, 2018.
- B. There was a sinkhole (subsidence) that occurred on Baltimore Pike on April 24, 2019.
- C. Three sinkholes (subsidences) occurred at Sleighton Park on the following dates: September 13, 2019; October 17, 2019; and October 28, 2019.
- D. On November 11, 2019, there was a leak in a valve that was part of a refined products line adjunct to the Mariner lines at the Glen Riddle Pump Station located behind the Tunbridge Apartments. The leak caused a misting of petroleum product in the area.
- E. On November 18, 2019, a void (underground cavity) was discovered under West Forge Road.
- F. There were many inadvertent returns on the 620 HDD resulting in multiple shutdowns by the Department of Environmental Protection. Ultimately, the 620 HDD failed and required an application for a major modification to the permit to convert the 620 from an HDD to direct pipe, conventional bore and open cut.

With respect to several of the incidents set forth above, Middletown did not receive any notice from Sunoco/Energy Transfer Partners, but, rather learned of the incidents after private concerned citizens called 911 or contacted Middletown. With respect to the incident at the Tunbridge Apartments on November 11, 2019, Sunoco/Energy Transfer Partners did not notify the County Emergency Dispatch Center, nor did it notify the Township at the time of the event,

even though the hydrocarbon sensor attached to the valve station at the Tunbridge location was triggered by the event.

During the hearings in this matter, and through their submissions, the Intervenor has requested the following relief: 1) The establishment of geophysical testing, inspection, and evaluation to assess the condition of the pipelines and the reporting of such geophysical testing results and findings to Middletown and Delaware County officials; 2) The requirement of a mass early warning notification system for immediate notice of a leak or potential explosion or other failure in the pipeline system to vulnerable public institutions within close proximity to the pipeline and specifically advance notification to the principal of Glenwood Elementary School in the event of any leak, potential explosion, or other failure of the pipeline system in the vicinity of Glenwood Elementary School; 3) Advance notification to Middletown and Delaware County prior to proposed excavation on the pipeline system; 4) the disclosure to Middletown and Delaware County of any damage or potential damage to Middletown facilities or property resulting from the operation of the pipelines; 5) Assistance with the establishment of an emergency plan for first responders in the event of a leak, release, explosion, or other failure of the pipeline system and the communication of all information required under state and federal law to enable Middletown and Delaware County to prepare such emergency plan; 6) The development of a specific comprehensive public education and awareness plan designed to inform and educate the public and Middletown and Delaware County officials and staff on proper and effective disaster prevention and disaster response, including participation in “tabletop” activities as referenced by Sunoco in its letter dated August 13, 2020 and admitted as exhibit SPLP-50.

The Intervenor respectfully requests that these, and the other relief set out in its Petition to Intervene, be granted and included in any final Order entered in this matter.

II. STATEMENT OF THE CASE

On November 19, 2018, Petitioners/Complainants Meghan Flynn, Rosemary Fuller, Michael Walsh, Nancy Harkins, Gerald McMullen, Caroline Hughes and Melissa Haines (collectively the “Flynn Complainants”) filed a Complaint against Respondent Sunoco Pipeline, L.P. (“Sunoco”) at Docket No. C-2018-3006116, consolidated with Docket No. P-2018-3006117. The Flynn Complainants averred that their properties in Chester and Delaware Counties were in close proximity to the Mariner East 1 (“ME1”) pipeline and/or a work-around 12-inch diameter pipeline that circumvents stopped construction on the Mariner East 2 (“ME2”) and Mariner East 2X (ME2X). At times, these Sunoco pipelines are referred to collectively as “the ME Pipelines”. The Flynn Complainants also averred that ME1, ME2, ME2X and the work-around pipelines carrying or intended to carry HVLs are inherently dangerous and due to their location in Chester and Delaware Counties (high consequence areas), a pipeline rupture there would be catastrophic.

The Flynn Complainants further contended that ME1 is being operated and the work-around pipeline is about to be operated without an adequate public awareness program, emergency notification system, or credible emergency management plan in violation of 49 CFR § 195.440. The Flynn Complainants contended that Sunoco is violating 49 CFR § 195.248 in that ME1 and the work-around pipeline are located within 50 feet of private dwellings or industrial buildings or places of public assembly without at least 4 feet of cover. The Flynn Complainants’ three-count Complaint requested that the Commission enter an Order directing Sunoco permanently to a) cease operation of the 8-inch ME1 pipeline; b) cease operation of the work-around pipeline, ME@ and ME2X; and c) grant such other relief as may be appropriate. Based on its interest as set forth above, Middletown filed a Petition to Intervene in the

proceedings on February 21, 2019. Middletown was granted intervenor status by Order of Judge Barnes on March 12, 2019.

III. STATEMENT OF THE QUESTIONS INVOLVED

- A. Whether the Court’s authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines, should be exercised to require Sunoco to establish procedures for geophysical testing, inspection, and evaluation in order to assess the condition of the pipelines and report the results and findings of such geophysical testing and inspection to Middletown officials?
- B. Whether the Court’s authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines, should be exercised to require Sunoco to provide a direct and mass early warning notification system providing immediate notice of a leak, potential explosion, or other failure in the pipeline system to Middletown and Delaware County officials, including the administration of Glenwood Elementary School?
- C. Whether the Court’s authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines, should be exercised to require Sunoco to provide advance notification to Middletown and Delaware County prior to proposed excavation on its pipeline system?
- D. Whether the Court’s authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines, should be exercised to require Sunoco to disclose to Middletown and Delaware County any damage or potential damage to Middletown facilities or property resulting from the operation of the pipelines?
- E. Whether the Court’s authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines, should be exercised to require Sunoco

to assist Middletown with the establishment of an emergency plan for first responders in the event of a leak, release, explosion or other failure of the pipeline system and to communicate all information required under state and federal law to enable Middletown and Delaware County to prepare such emergency plan?

- F. Whether the Court’s authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines, should be exercised to require Sunoco to develop a specific comprehensive public education and awareness plan designed to inform and educate the public and Middletown and Delaware County officials and staff on proper and effective disaster prevention and response including participation in “tabletop” activities?

IV. PROPOSED FINDINGS OF FACT

1. Intervenor, Middletown is a township in Delaware County, Pennsylvania, approximately 13.47 square miles in area with an approximate population of 16,000.
2. The ME pipelines run the length of Middletown Township from Edgmont at the North Boundary to Aston Township at the South Boundary. (Kirchgasser Direct Testimony, page 1).
3. There are now three HDDs located in Middletown, with a fourth having been converted to direct pipe, conventional bore and open cut. (Kirchgasser Direct Testimony, page 1).
4. Glenwood Elementary School is located in Middletown.
5. The ME2 pipeline is approximately 600 feet from the western boundary of Glenwood Elementary School. (Kirchgasser Direct Testimony, page 2).
6. Glenwood Elementary School has a valve station directly behind it. (Kirchgasser Direct Testimony, page 2).

7. The ME pipelines traverse densely populated areas in Middletown including Sleighton Park, Linvilla Orchards, and multiple senior citizen centers including Granite Farm Estates and the Residence at Glen Riddle Senior Living. (Kirchgasser Direct Testimony, page 2).

8. There are densely populated apartment communities in Middletown including Tunbridge and Glen Riddle Station which house families of all ages. (Kirchgasser Direct Testimony, page 2).

9. There are numerous residential neighborhoods consisting of town house and single family home communities running the entire length of the pipeline right of way in Middletown. (Kirchgasser Direct Testimony, page 2)

10. Multiple incidents have occurred in the Township related to the ME Pipelines.

11. An incident occurred on May 21, 2018, when a backhoe struck a section of ME2 adjacent to Lenni Road in the vicinity of Glenwood Elementary. (Kirchgasser Direct Testimony, page 2).

12. A sinkhole (subsidence) developed on Baltimore Pike on April 24, 2019. (Kirchgasser Direct Testimony, page 2).

13. Sinkholes (subsidences) developed at Sleighton Park on September 13, 2019, October 17, 2019, and October 28, 2019 at the site of the Sleighton HDD. (Kirchgasser Direct Testimony, page 2).

14. A leak in a valve occurred on November 11, 2019 causing a misting of a petroleum product in the Tunbridge area adjacent to the Mariner lines. (Kirchgasser Direct Testimony, page 2).

15. On November 18, 2019, a void (underground cavity) was discovered under West Forge Road along the Mariner right of way adjacent to the Sleighton HDD. (Kirchgasser Direct Testimony, page 2).

16. The 620 HDD failed leading to a major modification to the permit to convert the 620 to a direct pipe, conventional bore and open cut. (Kirchgasser Direct Testimony, page 2).

17. Gregory Noll, Sunoco's expert in emergency planning, testified on October 7, 2020. (N.T. October 7, 2020 at pg. 3292-3293).

18. There are locations in Middletown on the ME2 system that have hydrocarbon valve sensors. (N.T. October 7, 2020 at pg. 3372: 22-23).

19. A hydrocarbon valve sensor is triggered when at ten percent of the lower explosive limit of whatever calibrant gas is. (N.T. October 7, 2020, at page 3372: 22-23).

20. Gases that are being transported by ME2 are the type of gases that would cause triggering if they were in the atmosphere near the carbon sensor. (N.T. October 7, 2020, at 3373: 5-7).

21. When a sensor is activated or triggered it goes back to a control center or monitoring station. (N.T. October 7, 2020, at 3373: 12-13).

22. There is typically a validation of the signal or alarm to ensure that it is not a false positive. (N.T. October 7, 2020, at 3373: 221-25, 3374: 1-4).

23. If there is a concentration of vapor that has potential to explode within a thousand feet of a school building, the emergency requires the attention of the building principal. (N.T. October 7, 2020, at 3380: 3-10).

24. Mr. Noll was unable to provide any reason why Sunoco's control center could not communicate directly with the principal of Glenwood Elementary School upon the activation of

the hydrocarbon center on the adjacent valve station so long as the control center had first notified the County 911 Center. (N.T. October 7, 2020, at 3381: 24-25, 3382: 1-4).

25. Joseph McGinn, Vice President, Public Affairs & Government Relations, testified that all of the educational and instructional programs set forth in his letter of August 13, 2020 (SPLP 50) remain open and available to Middletown Township. (N.T. October 6, 2020 at page 3254-3363).

26. Tim Bechtel, a consulting geologist for Sunoco, working in conjunction with Rettew, Sunoco's geology consultants, testified that Rettew is committed to performing follow-up studies to ensure the integrity of the 591 HDD in the area of Sleighton Park and the intersection of West Forge and Valley Road in Middletown Township. (N.T. October 8, 2020, at page 3649: 10-22).

27. The testimony of Mr. Bechtel was corroborated by the testimony of another Sunoco consultant, James McKelvey. Mr. McKelvey testified that follow-up geophysical studies are required to ensure the integrity of the area involved in the 591 HDD, including Sleighton Park and the intersection of West Forge and Valley Road in Middletown Township. (N.T. October 8, 2020, at pages 3761-3763).

V. SUMMARY OF ARGUMENT

As set forth in the foregoing Proposed Findings of Fact, Middletown Township is clearly entitled to relief in the form of additional safeguards to enhance the safety of its residents. First, it is clear from the evidence that there is no impediment to Sunoco providing prompt communication to Glenwood Elementary School in the event that the hydrocarbon sensor on the valve station adjacent to Glenwood is activated. Sunoco's safety expert offered no impediment to such communication, so long as the control center has made the initial call to the 911 center.

Similarly, Sunoco has offered no reason why the 911 center should not receive immediate notification upon the activation of either of the hydrocarbon sensors located in Middletown Township. This would avoid the confusion that arose at the Tunbridge area during the gasoline leak that occurred adjacent to the Mariner lines that occurred on November 11, 2019.

Middletown is also entitled to the complete and permanent restoration of the integrity of the community's landscape. Sunoco's consulting geologists have testified that it is important to conduct follow-up geophysical testing in the area of the 591 HDD in the area of Sleighton Park and the intersection of West Forge and Valley Road. The conduct of such follow-up testing to ensure the integrity of the subsurface in the effected reason should be so ordered.

The testimony of Joseph McGinn, Sunoco's Vice President for Public Affairs & Government Relations testified that Sunoco will fulfill its commitment to provide all of the programs and guidance set forth in his letter of August 13, 2020. (SPLP-50). The provision of the programs, training, and guidance set forth in SPLP-50 should be so ordered.

Sunoco's public utility status should not preclude it from providing notice in advance to Middletown Township any time that it is going to conduct work on the Mariner Pipeline or in the area of the Mariner Pipeline in order to allow the Township to take any necessary precautionary measures. Middletown requests that the Court so order as there is no impediment to such communication anywhere in the record.

Middletown Township has met its burden for the institution of the safety measures set forth above. They should be incorporated into any order issued by the Court.

VI. ARGUMENT

Please see the argument set forth above in the Summary of Argument.

VII. PROPOSED ORDERING PARAGRAPHS

Middletown Township proposes the following ordering paragraphs:

1. The Court has the authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines and should be exercised to require Sunoco to establish procedures for geophysical testing, inspection, and evaluation in order to assess the condition of the pipelines and report the results and findings of such geophysical testing and inspection to Middletown officials.
2. The Court has the authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines and should be exercised to require Sunoco to provide a direct and mass early warning notification system providing immediate notice of a leak, potential explosion, or other failure in the pipeline system to Middletown and Delaware County officials, including the administration of Glenwood Elementary School.
3. The Court has the authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines and should be exercised to require Sunoco to provide advance notification to Middletown and Delaware County prior to proposed excavation on its pipeline system and disclose to Middletown and Delaware County and damage or potential damage to Middletown facilities or property resulting from the operation of the pipelines.

4. The Court has authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines and should be exercised to require Sunoco to assist Middletown with the establishment of an emergency plan for first responders in the event of a leak, release, explosion or other failure of the pipeline system and to communicate all information required under state and federal law to enable Middletown and Delaware County to prepare such emergency plan.
5. The Court has the authority to supervise and regulate public utilities, as well as supervise and regulate Sunoco in the operation of its pipelines and should be exercised to require Sunoco to develop a specific comprehensive public education and awareness plan designed to inform and educate the public and Middletown and Delaware County officials and staff on proper and effective disaster prevention and response including participation in “tabletop” activities.

VIII. RELIEF REQUESTED

Intervenor, Middletown Township respectfully requests that this Court grant the relief requested in the Petition to Intervene.

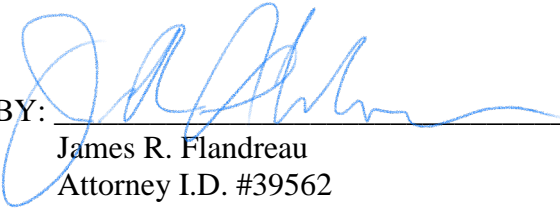
IX. CONCLUSION

There is no limitation on the Court’s ability to institute these common sense and much needed safety measures, which have been supported by the lay and expert testimony in this case. Sunoco demonstrated no prejudice if such relief is granted and it is respectfully submitted that

once instituted, there will be little, if any, impact on Sunoco's operations. The only result will be the increased safety and security for the residents of Middletown Township.

Respectfully submitted,

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Dated: December 16, 2020

CERTIFICATE OF SERVICE

I hereby certify that this day I have served a copy of the Intervenor’s Post-Hearing Brief upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a party).

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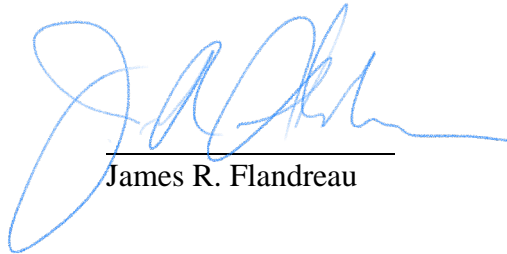
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