

Secretary Pennsylvania PUC  
Keystone Building, 2nd Floor 400 North Street  
Harrisburg PA 17120  
Reply Comment docket number L-2019-3010267

Having read several comments on this proposed rulemaking, I would like to again submit words. The retroactive appliance of ground cover and pipeline spacing seems to be a large cause of concern for others commenting. While this is an essential regulation to protect PA from pipelines in the future, and from pipelines being built now, it would cause some disruption and difficulty for the locales and residents present in these areas. An increase of penalty for adverse events at these locations would cause a re-reckoning of the cost-benefit analysis of risky behaviors such as close placement, and shallow cover that could cause a company to rehome or recover a dangerously placed pipeline, while retaining firm language to disallow risky behaviors in the present and future.

In direct response to the DEP's comment recommending amendment to language concerning "the affected public". While I agree that language should be clarified to avoid industry lawyers dodging notification requirements due to vagaries, I disagree vehemently that notifications should be restricted to surface landowners, and that the distance be limited to a 1,000 feet border surrounding earth disturbances. People who do not own land must still be notified of these systems. I personally rent a room near pipelines, and I do not trust my landlords to effectively notify me of dangers exogenous to the room itself. The concept of notifying only surface level landlords ignores a huge number of individuals affected by pipelines. My community at large sits at rest within the destructive influence of the Mariner East system, a pipe that holds an explosion radius of a half mile at conservative estimate, or over 2,500 feet, with less conservative estimates placing the explosive radius over 5,000 feet. Both of these distances are over 1,000 feet and the proposed rulemaking would exclude individuals as risk from this pipeline. All people who may be impacted by a pipeline, whether through earth disturbance, explosion risk, or pollution, must be notified in advance of the approval of permits.

Again, I would point the Commission's attention to the thinly veiled threats of the industry,

"if you attempt to regulate us, service will be unreliable and the customer will pay more."

I posit it is precisely the duty of this commission to ensure that these eventualities do not occur, and that the extinction of some pipeline services would benefit the public health and safety of PA residents. There are fluids and gasses that simply should not be transported by any method, and should never leave the ground in the first place, and any regulation by this commission that encourages that equilibrium should be championed. Speaking then to the profits of the industry, if regulation suitable to ensure the safety of residents makes your business unprofitable, then it was never profitable in the first place, the business was simply failing to make a true accounting of the externalities of their actions. Furthermore, should regulation make a pipeline services

unprofitable, the company should offer the infrastructure to the people of PA, and upon refusal, shoulder the cost of decommissioning the line.

I would caution the Commission that the industry will attempt to raise prices to the consumer to maintain their profits, essentially making the customer pay for their own increased safety. This should be illegal, and companies should be operating essentially as a nonprofit before they raise prices to the consumer. Any industry that engages in stock buybacks or is in any form subsidized by the government should be incapable of raising prices to the consumer. The safety of myself, my home, and my community have been placed at risk by the activities of billionaire Texas oilmen, for their profits, and this is an unacceptable state of affairs. I encourage the Commission to provide for the safety, health, and well-being of PA residents before they protect the financial interests of often-out-of-state fossil fuel conglomerates.

I will reiterate the commonsense principles enumerated by my colleague in another comment.

- HVL pipelines only be placed in extremely low population density areas, and only after a thorough review of safety risks posed and mitigation measures possible.
- HVL pipelines only be allowed where a public good can unequivocally be demonstrated. If no public good exists and the pipeline is purely for private profit, the company should have to share some portion of profit with the affected community.
- The company building the pipeline must resource EMS that serves the blast zone with a feasible plan to both notify residents of a leak and to respond effectively to a leak. Technology, equipment, and funding to carry out this plan should also be provided in large part by the company.
- Residents in the blast zone must be thoroughly educated on the risks and on how to be notified of a concern. A phone notification system should exist.
- The pipeline emergency plan must take nearby people with disabilities into account.
- The pipeline construction should be reviewed and engineered for extra safety measures specific to HVLs.
- Construction can not occur until environmental impact studies AND groundwater impact studies are completed, where results indicate little to no negative impact. These studies should establish the impacts not only of the active pipeline but also the effects of the construction itself.
- Leak detection & alert system required.
- Free water testing and remediation to all well owners in proximity to the pipeline.
- The recommendations of FWW, Penn Futures, Clear Air Council, the Local State Representatives, and other experts should be taken into account fully and seriously. They have a lot of expertise on what good regulation should entail.

Thank you for your time and consideration,  
Connor Young, RN  
364 Devon Dr. Exton PA, 19341