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December 8, 2023

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Re: Proposed rulemaking updating Chapter 59 of the Pennsylvania Public Utility Commission's regulations (52 Pa. Code) to encompass "Hazardous Liquid Public Utility Safety Standards."; Docket No. L-2019-3010267; **SUNOCO PIPELINE L.P. RESPONSES TO LAW BUREAU DATA REQUESTS, SET 1 (PUBLIC VERSION)**

Dear Secretary Chiavetta:

On September 20, 2023, Sunoco Pipeline L.P. (SPLP) filed by copy a letter with the Secretary's Bureau explaining that SPLP provided a copy of its Responses to Law Bureau Data Requests Set 1 to Law Bureau that contained Confidential Security Information and other confidential information.

Enclosed herein for filing is a Public Version of SPLP's Data Responses to Law Bureau Set 1. Please note that all information that has been redacted because it is Confidential Security Information has the redaction overlaid with red text indicating CSI. All information that has been redacted because it is competitively and commercially sensitive information (Confidential Business Information) has the redaction overlaid with white text indicating CBI.

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
December 8, 2023
Page 2

If you have any questions regarding this filing, please contact me.

Very truly yours,

/s/ Whitney E. Snyder

/s/ Thomas J. Sniscak

Thomas J. Sniscak
Whitney E. Snyder
Phillip D. Demanchick Jr.

Counsel for Sunoco Pipeline L.P.

TJS/WES/das
Enclosure

cc: Elizabeth Barnes (ebarnes@pa.gov)
Adam D. Young (adyoung@pa.gov)
Colin W. Scott (colin.scott@pa.gov)
Hayley E. Dunn (haydunn@pa.gov)
Erin N. Tate (etate@pa.gov)

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

1. Please provide the estimated incremental cost to increase the depth of cover of a hazardous liquid (HL) pipeline within an agricultural area of Pennsylvania, as required in the proposed regulations.

RESPONSE:

SPLP operates hundreds of miles of pipelines in agricultural areas throughout the Commonwealth of Pennsylvania and has done so without incident related to any farming cultivation for over 20 years. SPLP notes the significant costs that will result from these proposed regulations directly to SPLP for pipeline relocation and potential pipeline shut down are only a portion of the cost impacts the proposed regulations would impose. Other costs that should be considered include disruptions to communities and landowners where pipeline relocation will occur and impacts to the Commonwealth, national, and international economies and supply chains as a result of potential pipeline shutdowns as a result of temporary shut downs to perform work required by the potential regulations or due to permanent shut downs because of the onerous costs of compliance with the proposed regulations.

As discussed at length in SPLP's Comments at this docket, the products the Mariner East pipelines carry (natural gas liquids such as propane, butane, and ethane), in addition to the refined products transported by SPLP throughout the state (gasoline, diesel, home heating oil, jet fuel), are key commodities to the Pennsylvania and world economies. Shut down of SPLP's pipelines to comply with the proposed regulations will result in shipping delays and potential shortages of these products, raising prices and causing additional shortages down the supply chain of important goods.

Moreover, to the extent any operational pipeline must be shut down to comply with the proposed regulations, SPLP will suffer lost revenues. SPLP estimates that it will lose [BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]¹ per day of shut down of the ME2X pipeline and [BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL] per day of shut down of the ME2 pipelines.

¹ **Public Version**

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

Increasing depth of cover would in most instances be accomplished through line lowering, **CSI**
[REDACTED]. The direct costs associated with line lowering are approximately \$485,000 per 1,000 feet. SPLP would also have to perform depth of cover surveys which cost approximately \$350/mile to conduct a depth of cover survey every 25 feet. Depth of cover surveys to comply with this and other proposed regulations for the Mariner East 2 and Mariner East 2X pipelines alone would cost \$113,400 and \$106,750 per survey. Given the hundreds of miles of pipeline SPLP installed, operates, and maintains in compliance with current regulation in agricultural areas, SPLP would be likely be faced with *hundreds of millions of dollars* in relocation costs and years of disruption to local communities during the relocation process to comply with the proposed regulation.

To the extent traditional methods of line lowering cannot be used or are not feasible due to utilities in the area or other workspace constraints, the pipeline would need to be relocated and the costs regarding pipeline relocation discussed in response to Requests 2 and 3 would apply.

**PROVIDED BY: LAUREN TILLEY, SENIOR MANAGER – PIPELINE PROJECTS
 JOHN FOLTZ, DIRECTOR – TECHNICAL OPERATIONS
 JOHN FIELD, MANAGER – CORROSION SERVICES
 RICHARD BILLMAN - SENIOR VICE PRESIDENT – BUSINESS
 DEVELOPMENT**

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

2. Please provide incremental cost to relocate a pipeline away from a building, as required in the proposed regulations.
 - a. Provide the estimated cost if the pipeline is already out of service for other reasons, and/or
 - b. The cost to remove from service to accomplish the relocation.
3. Provide the best case and worse case cost estimates to relocate a pipeline to maintain a 12-inch clearance from other underground structures or pipelines.

RESPONSE TO 2 AND 3:

Data Requests 2 and 3 both essentially seek cost information regarding pipeline relocation whether due to increasing distance from a building or other pipeline structures, and thus SPLP is providing a combined response regarding these two Requests.

The Commission should consider the costs of pipeline shutdowns both temporary and permanent to SPLP, the Commonwealth, national, and the international economy in addition to the direct relocation costs associated with compliance with the proposed regulations detailed below. The proposed regulatory requirements to relocate pipelines due to proximity to buildings or underground structures will cause at least temporary pipeline shut downs and could cause permanent shut downs because when SPLP's pipelines were constructed, applicable law and regulations permitted the location of these pipelines that the proposed regulations would require be relocated, but there are more likely than not urban and suburban areas where SPLP's current pipelines are located that do not allow for relocation due to the amount of buildings and underground infrastructure in the area.

As discussed at length in SPLP's Comments at this docket, the products the Mariner East pipelines carry (natural gas liquids such as propane, butane, and ethane), in addition to the refined products transported by SPLP throughout the state (gasoline, diesel, home heating oil, jet fuel), are key commodities to the Pennsylvania and world economies. Shut down of SPLP's pipelines to comply with the proposed regulations will result in shipping delays and potential shortages of these products, raising prices and causing additional shortages down the supply chain of important goods.

Moreover, to the extent any operational pipeline must be shut down to comply with the proposed regulations, SPLP will suffer lost revenues. SPLP estimates that it will lose **[BEGIN**

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] per day of shut down of the ME2X pipeline and [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] per day of shut down of the ME2 pipelines.

In addition to the excessive and unnecessary costs these regulations would impose with no proven safety benefit, the Commission cannot regulate pipelines out of existence in high consequence areas and cannot use safety as a pretext to do so. Regulating pipelines out of existence in high consequence areas is directly contrary to and inconsistent with Federal law and regulations. The Commission should not promulgate the regulations referenced in these requests, or at the very least should clarify that these regulations will only apply to new pipeline construction.

Pipeline relocation (like new pipeline construction) is a significant, time consuming, and expensive undertaking for both the pipeline operator that incurs direct costs and the communities that will face disruption from pipeline construction. Most of these communities along the Mariner East corridor have recently experienced disruption due to pipeline construction within the past five years, and the Commission needs to consider the impacts to those communities that will occur (again) due to the proposed regulations.

The cost of pipeline relocation is dependent on numerous factors including but not limited to location and associated characteristics of the relocation area like geology, building location and density, utility location and density; diameter and length of the pipeline; method of relocation used; right-of-way acquisition costs; permitting costs; and legal costs. Below, SPLP provides an estimate for each relocation method which includes all aspects of a project from engineering, permitting, material purchase, construction, pipeline purges and tie-ins, but not complete removal, which is listed as a separate category. For projects of a more significant magnitude, a percent multiplier would need to be added to cover management, overhead, excessive right-of-way acquisition costs, and legal costs.

Open Cut Construction – \$600-\$3,400 per linear foot (“/LF”). The minimum cost for a 100-foot relocation starts at \$250,000 to account for mobilization and base cost. Prices increase from here are based on complexity. An open cut project length can range widely from 20 feet to miles.

Traditional Bore (Roadway and Railroad Crossings) - \$3,600-\$5,000/LF. The minimum cost is \$360,000 per project. This option covers auger bore or alternative similar construction methods under roadways or other obstructions and associated pipe tie ins. It also covers bores where a railroad is involved, and more intensive permitting/inspection coverage is required by the railroad. Typical bore type projects range from 100 feet to 300 feet long.

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

HDD (Horizontal Directional Drill) - \$1,650-\$6,900/LF. The minimum cost is \$1,650,000 per project. This option covers directionally drilled pipelines of various diameters and difficulties with associated tie in piping on either end. Typical HDD projects range from 1,000 feet to 7,000 feet long.

Pipeline Abandonment/Removal - \$120-\$850/LF. Minimum cost for 100 foot abandonment/grout filled line is \$75,000; minimum cost for 100 foot removal of line is \$60,000. Increased disposal cost will be incurred depending on coating type. These are the incremental costs associated with completely removing a pipeline, which would be an adder to the above-listed costs.

The above costs all include the cost of a pipeline purge (ie. the above costs all include the direct costs of taking a pipeline out of service). A pipeline purge generally costs approximately \$35,000/mile (minimum of \$350,000 for a 1-10 mile segment).

These above costs are all “best case scenario” costs. The worst case scenario cost is permanent shut down of hazardous liquid pipeline service in the Commonwealth, which will cost not just SPLP, but the Commonwealth, national and world economies as discussed at length in SPLP’s Comments and Reply Comments at this docket.

SPLP is also providing two real world examples of pipeline relocations to illustrate an order of magnitude cost estimate. SPLP notes that these scenarios have not been evaluated for due diligence issues like the feasibility of obtaining permits and right-of-way access, which could require a larger or altered reroute or may make rerouting infeasible or impossible. SPLP also notes that these examples are not the only areas of the Mariner East pipelines or other hazardous liquids lines that could require relocation if the proposed regulations are promulgated and applied to existing pipelines.

Relocation due to proximity to Exton Baseball Fields: Approximately [BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]

The map below depicts generally a conceptual reroute of the ME2X 16-inch pipeline and ME2 20-inch pipeline to relocate these pipelines that currently run under the Exton Baseball Fields to comply with the proposed regulations as reflected in the Commission’s Notice of Proposed Rulemaking Order regarding distances from places of recreational congregation. The red lines are open cut and road bore installations and the blue line is an HDD. The chart below breaks down costs, including lost revenues.

Notice of Proposed Rulemaking Regarding Hazardous Liquid Public Utility Safety Standards at
52 Pa. Code Chapter 59; Docket No. L-2019-3010267

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version



**SUNOCO PIPELINE L.P.’S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

	FT	Cost/FT	Cost/Mile	16in	20in	Total
Installation Segment 1	2100	\$3,409	\$18,000,000	\$7,159,091	\$7,159,091	\$14,318,182
Installation Segment 2	1900	\$3,409	\$18,000,000	\$6,477,273	\$6,477,273	\$12,954,545
Installation Segment 3 - HDD	2100	\$6,900	\$36,432,000	\$14,490,000	\$14,490,000	\$28,980,000
Road Bores (2 @ 300FT)	600	\$4,000	\$21,120,000	\$2,400,000	\$2,400,000	\$4,800,000
Pipeline Purge/Refill				\$400,000	\$400,000	\$800,000
Lost Revenue				[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]	[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]	[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]
Total				[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]	[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]	[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]

This is just one example of the extensive and substantial costs associated with re-locating a pipeline to avoid a place of public assembly, such as baseball fields. Enforcing siting restrictions under or near outdoor, recreational areas could be impractical to comply with and could regulate pipeline public utilities out of business in Pennsylvania.

Relocation due to 12-inches of separation rule with no exception for adequate cathodic protection – Bundled HDDs in Chester County: Approximately [BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]

As the Commission is or should be aware, construction of the ME2 and ME2X pipelines in East and West Goshen Township, Chester County at Greenhill Road were “bundled” (*i.e.*, one HDD was conducted and both pipes were pulled through the same hole, a method that is safe and legal under current law and regulation including when this pipeline construction was performed just a few years ago. These pipelines utilize an interconnected cathodic protection system and thus have adequate cathodic protection. The reasoning behind PHMSA’s 12-inch rule and exception for adequate cathodic protection is that other underground structures can potentially inhibit adequate cathodic protection. The Commission’s proposed regulations unnecessarily remove this exception and thus compliance with the Commission’s regulations would mean a complete reconstruction of these two pipelines in this area. SPLP further estimates it would take about 120 days to complete

**SUNOCO PIPELINE L.P.’S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

each pipeline reconstruction, meaning significant disruption to the surrounding communities. A breakdown of the costs is in the chart below.

	FT	Cost/FT	Cost/Mile	16in	20in	Total
Installation 16in & 20in HDDs	3400	\$6,900	\$36,432,000	\$23,460,000	\$23,460,000	\$46,920,000
Pipeline Purge/Refill				\$400,000	\$400,000	\$800,000
Lost Revenue				[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]	[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]	[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]
Total				[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]	[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]	[BEGIN CONFIDENTIAL] CBI [END CONFIDENTIAL]

* This accounts for five days of lost revenues, which is the estimated time it would take to tie the new pipelines into the system and assumes that a pipeline that is deemed non-compliant with the proposed regulations would be allowed to continue to operate until tie in of the new pipeline segment could be implemented.

PROVIDED BY: **KYLE DONNELLY, DIRECTOR – ENGINEERING**
 LAUREN TILLEY, SENIOR MANAGER - PIPELINE PROJECTS
 JOHN FIELD, MANAGER – CORROSION SERVICES
 RICHARD BILLMAN - SENIOR VICE PRESIDENT – BUSINESS
 DEVELOPMENT

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

4. Regarding construction costs:
- a. Cost of a single non-destructive test (NDT) on a weld during a pipeline construction project and;
 - b. Additional cost if ALL welds must be NDT.
 - c. Provide an estimated cost per mile to NDT each weld on a pipeline new construction or reconstruction/repair.
 - d. Incremental cost to add additional NDT while on a construction job that already required NDT.

RESPONSE:

X-Ray technicians are billed on a day rate. Therefore, one weld would cost the price of a crew day if done individually. The example below is for a two to three person crew that has free and clear access to as many welds as they can shoot in a day (*i.e.*, this is a conservative estimate). A weld and x-ray is required approximately every 40 feet of pipe and also where fittings are located. This does not reflect following a welding crew and having to wait behind them to maintain safe radiation distances, etc., which would cause additional incremental costs. Usually, the general contractor performing the relocation work will layout and weld as much of the pipe as possible and then call out the x-ray crew when there are multiple welds to shoot. The average relocation project will have an x-ray crew on site for two to seven days total depending on the magnitude of the project. This production rate and assumption does not apply to a large capital project in the hundreds of miles range. In this case, the x-ray crew will be staggered behind the welders and just follow the welders as they progress. See additional details below:

- Cost = \$2,200-\$3,200/Day
- Typical Products Rates:
 - 6-10 inches - approximately 40-50/day
 - 12-16 inches - approximately 30-40/day
 - 20 inches - approximately 15-20/day
 - 24-26 inches - approximately 10-15/day

Notice of Proposed Rulemaking Regarding Hazardous Liquid Public Utility Safety Standards at
52 Pa. Code Chapter 59; Docket No. L-2019-3010267

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

[Public Version](#)

PROVIDED BY: LAUREN TILLEY, SENIOR MANAGER - PIPELINE PROJECTS

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

[Public Version](#)

5. Cost for protection of valve stations from vehicular damage using jersey barriers or other adequate vehicular protection such as bollards.

RESPONSE:

Approximately \$1,850 per valve. Total costs to comply with the proposed regulation depends on factors such as size and location of the pipeline and valve.

PROVIDED BY: KYLE DONNELLY, DIRECTOR – ENGINEERING

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

6. Pressure testing: Section 59.139
 - a. Incremental cost to hydrostatically test a pipeline and record results.
 - b. Breakdown of estimated cost to take a HL pipeline out of service to perform a hydrostatic test.
 - i. Cost per mile.
 - ii. Cost per 1000 gallon of water treatment and disposal.
 - c. Breakdown of estimated cost to run a hydrotest on a pipeline that is already purged of product.
 - d. Breakdown of incremental estimated cost to run a hydrotest on a pipeline that is already purged of product.
 - e. Breakdown of incremental estimated cost to run a hydrotest on a pipeline that is not flowing product but has not been purged or prepared for a hydrostatic test.

RESPONSE:

Average Cost to hydrotest a pipeline is: \$36,000/mile (minimum \$350,000 for 1-10 mile segment)

Average Cost to purge an NGL line in preparation for hydrotest is: \$35,000/mile (minimum \$350,000 for 1-10 mile segment)

Average cost to dry an NGL pipeline after testing is \$7,500/mile (minimum \$75,000 for a 1-10 mile segment).

Average cost of water treatment and disposal per 1000 gallons is \$250/1000 gallons


To hydrotest a section of hazardous liquid pipeline, the product must be removed and replaced with hydrotest water. Water fill conditions vary, but if possible, water would be used to displace product from the pipeline section. The product would typically be displaced into downstream delivery terminal.

For NGL lines, a purge will always be required before water fill (*i.e.* water cannot displace the product). Likewise, if elevation profile, delivery pressure, quality concerns, or other limitations prevent direct displacement of product with water, the pipeline section must first be purged of

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**


Public Version

product. **CSI**



After the line section is completely filled with water, a stabilization period follows to allow the temperature of water and surrounding soil to equalize. Blind flanges or other suitable isolations are installed at all end and branch connections to prepare the pipeline for hydrotest. When temperature stabilization and isolation installations are complete, instrumentation and test pumps are installed and the hydrotest is performed.

When the hydrotest is complete, isolation points are removed and water is displaced from the pipeline section. If possible, product would be used to displace water to temporary storage. Often a **CSI** purge must be used to remove water from the pipeline section. For NGL lines, the lines are typically dried **CSI** before being returned to service. **CSI**



PROVIDED BY: LAUREN TILLEY, SENIOR MANAGER – PIPELINE PROJECTS

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

7. In-line inspection (ILI) tool runs:
- a. Incremental cost breakdown for ILI tool runs using Magnetic Flux Leakage (MFL), Caliper and Geo-tools.
 - b. Incremental cost breakdown for adding another tool, such as an ultrasonic tool for crack detection, to an already planned tool run.
 - c. Incremental cost increase to perform ILI tool runs on a 3-year interval vs. a 5-year interval.

RESPONSE:

- a. No added cost to this requirement since all of Energy Transfer pipelines under PAPUC jurisdiction are currently being assessed with MFL/GEO ILI technology. The current costs to assess all of the Energy Transfer pipelines under PAPUC jurisdiction with MFL and Geometry ILI Tools is approximately \$9MM over a 5-year period. This cost breakdown only includes the cost of setting up, preparing for, and running the ILI tools for all of the pipeline segments, but does not include any of the costs associated with excavation and repair of any anomalies reported by the ILI tools.
- b. If an Energy Transfer pipeline under PAPUC jurisdiction were required to add another inspection technology such as ultrasonic tools for crack detection, the incremental cost would be approximately \$300,000 to \$1,750,000 per pipeline segment. This cost range is dependent on the tool type, such as Circumferential MFL, Ultrasonic Crack, or Electromagnetic Acoustic Transducer (EMAT), the product the tool needs to run in and the length of the pipeline segment. If all Energy Transfer pipelines under PAPUC jurisdiction were required to add another inspection technology to an already planned tool run the total costs would be approximately \$20MM to \$25MM over a 5-year period.
- c. If the reassessment interval for all Energy Transfer pipelines under PAPUC jurisdiction were reduced from 5-year to 3-year intervals, the total cost for performing MFL and Geometry ILI tool assessments would increase approximately \$18MM over the next 15-year period. This cost does not account for inflation or the rising costs of ILI tools over the next 15 years. Decreasing the reassessment interval from 5-year to 3-year intervals would equate to 5 inspection cycles of all of the pipeline segments in the next 15 years as opposed to 3 inspection cycles as the regulation sits today.

Notice of Proposed Rulemaking Regarding Hazardous Liquid Public Utility Safety Standards at
52 Pa. Code Chapter 59; Docket No. L-2019-3010267

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

[Public Version](#)

**PROVIDED BY: BRIAN JIMENEZ, SENIOR DIRECTOR OF PIPELINE
INTEGRITY**

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

8. Leak detection and training:
- a. Cost per mile for leak detection technology that can detect a small leak and alarm to a control room.
 - b. Cost to perform a Tabletop exercise in Pennsylvania involving regionalized parties.
 - c. Cost perform training to localized emergency response officials.
 - d. Cost to meet in person with local liaison officials.

RESPONSE:

- a. **CSI** [REDACTED]
Costs for installing leak detection **CSI** [REDACTED] on a pipeline can vary, depending on whether the installation is at an existing facility or greenfield, portable or fixed proving is needed, pipeline tie in logistics, etc. SPLP estimates **CSI** [REDACTED] would cost \$2.5 million for a hazardous liquid pipeline and \$4 million for an HVL pipeline **CSI** [REDACTED]
[REDACTED] there are several factors that impact the cost, namely, (1) the number of injections and deliveries, (2) the type of product in the line, (3) the number of intermediate pumps, and (4) flow direction (uni-flow vs. bi-directional flow). A sample price for an A to B crude pipeline that is less than 10 miles, one inlet and one outlet, uni-directional flow and no intermediate pumps; no new hardware required, would cost approximately \$65,000.00. On a larger scale, the price for a 2,000-mile crude pipeline, 13 inlets and 8 outlets, uni-directional flow, ten intermediate pump stations; no new hardware required, would cost approximately \$620,000.00.

**PROVIDED BY: DAVID MARTINEZ, SENIOR MANAGER – ITAO LEAK
DETECTION
KYLE DONNELLY, DIRECTOR - ENGINEERING**

- b. The cost to perform one table top exercise is approximately \$10,000.00. SPLP's hazardous liquid pipelines cross through 37 counties.

PROVIDED BY: JAMES SHULER, EMERGENCY RESPONSE MANAGER

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

- c. SPLP is using its Mariner East Emergency Response Outreach (“MERO”) costs to provide an estimate. Each MERO session costs on average about \$3,000. Assuming one session per county per year, this would be a cost of approximately \$1110,000 annually.
- d. SPLP estimates the required liaison activities (twice per year) would cost approximately \$200,000 annually. SPLP already meets with local emergency responders once per year and holds various types of training sessions annually for local emergency responders. However, the proposed regulation would increase the number of required training and liaison sessions annually and while the proposed regulation is unclear on who must be invited to these events, it appears significantly more people would be required to be invited to each event. Thus, SPLP believes the proposed regulations will more than triple what it already spends in Pennsylvania on liaison activities and training and SPLP will be required to spend more in Pennsylvania than any other state where it has pipeline facilities, including Texas where Energy Transfer, SPLP’s parent Company, has 21 times the mileage of SPLP pipelines than in Pennsylvania, crossing through 229 counties.

PROVIDED BY: GINA GREENSLATE, SENIOR MANAGER PUBLIC AWARENESS

**SUNOCO PIPELINE L.P.'S RESPONSES TO LAW BUREAU DATA REQUESTS, SET I,
NOS. 1 - 9**

Public Version

9. Corrosion:
- a. Incremental cost of Close Interval Survey (CIS) runs including paved areas in an urban environment.
 - b. Incremental Cost of CIS excluding paved areas in an urban environment.

RESPONSE:

SPLP is providing the following information for two of its pipelines as cost examples:

Cost For CIS Over Paved ROW

	ME2	ME2X
Approximate paved pipeline miles in PA	10	10
\$6,000 per mile to conduct CIS over paved areas	\$60,000	\$60,000
\$2,700 per mile for traffic control	\$27,000	\$27,000
\$2,000 per mile for state, county & township permits	\$20,000	\$20,000
	\$107,000	\$107,000

Cost For Standard CIS

	ME2	ME2X
Approximate pipeline miles in PA	324	305
\$570 per mile to conduct standard CIS	\$184,680	\$173,850

PROVIDED BY: JOHN FIELD, MANGER - CORROSION SERVICES

VERIFICATION

I, Brian Jimenez, certify that I am the Sr. Director of Pipeline Integrity for Sunoco Pipeline L.P. and that in this capacity I am authorized to and do make this verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

Signature:



Name:

Brian Jimenez

Title:


Senior Director of

Pipeline Integrity

DATED: 09/20/2023

VERIFICATION

I, David Martinez, certify that I am the Sr. Manager – ITAO Leak Detection for Sunoco Pipeline L.P. and that in this capacity I am authorized to and do make this verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

Signature: 

Name: David Martinez

Title: Sr. Manager – ITAO Leak Detection

DATED: 09/20/2023

VERIFICATION

I, Kyle Donnelly, certify that I am the Director - Engineering for Sunoco Pipeline L.P. and that in this capacity I am authorized to and do make this verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

Signature: 

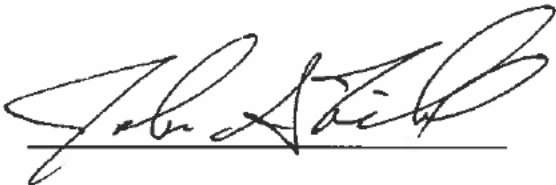
Name: Kyle Donnelly

Title: Director - Engineering

DATED: 09/20/2023

VERIFICATION

I, John Field, certify that I am the Corrosion Manager for Sunoco Pipeline L.P. and that in this capacity I am authorized to and do make this verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

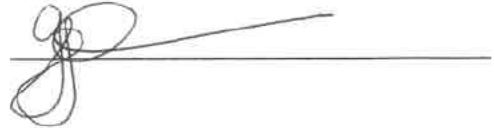
Signature: 
Name: John Field
Title: Corrosion Manager

DATED: 09/20/2023

VERIFICATION

I, Gina Greenslate, certify that I am the Senior Public Awareness Manager for Sunoco Pipeline L.P. and that in this capacity I am authorized to and do make this verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

Signature:



Name:

Gina Greenslate

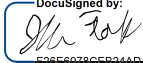
Title:

Senior Public Awareness Manager

DATED: 09/20/2023

VERIFICATION

I, John Foltz, certify that I am the Director of Technical Operations for Sunoco Pipeline L.P. and that in this capacity I am authorized to and do make this verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

Signature:  _____
F26E6078CEB24AD...

Name: John Foltz

Title: Director of Technical Operations

DATED: 09/20/2023

VERIFICATION

I, James Shuler, certify that I am the Emergency Response Manager for Sunoco Pipeline L.P. and that in this capacity I am authorized to and do make this verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

Signature:



Name:

James Shuler

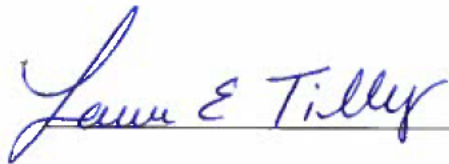
Title:

Emergency Response Manger

DATED: 09/20/2023

VERIFICATION

I, Lauren Tilley, certify that I am the Sr. Manager Pipeline Projects for Sunoco Pipeline L.P. and that in this capacity I am authorized to and do make this verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

Signature: 

Name: Lauren Tilley

Title: Sr. Manager Pipeline Projects

DATED: 09/20/2023

VERIFICATION

I, Richard Billman, certify that I am the SVP -BD for Sunoco Pipeline L.P. and that in this capacity I am authorized to and do make this verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

Signature: 

Name: Richard Billman

Title: Sr. Vice President –
Business Development

DATED: 09/20/2023