

NOTICE OF EXCAVATION WORK **TWIN OAKS – NEWARK 14” DIAMETER PIPELINE**

Sunoco Pipeline LP (“SPLP”) is in the process of planning to perform excavation work at various locations along the Twin Oaks-Newark Pipeline (the “Pipeline”). This work is being performed in accordance with regulatory requirements and under the oversight of the Pipeline and Hazardous Materials Safety Administration (“PHMSA”). This work is a component of integrity management work that is currently underway on the Pipeline to ensure that the Pipeline is continuing to operate safely.

In Upper Makefield Township, the first stage of SPLP’s work will begin the week of August 25, 2025, and will involve completing surveys at each of the locations. This work will include survey crews marking the locations of the Pipeline and surrounding area with flags, paint, and other survey markers, and evaluating the locations for potential permitting. The second stage of the work will involve excavating each of the locations and performing evaluations and further work on the Pipeline. The third and final stage of the work will involve backfilling each excavation location and restoring the land surface.

One of types of work that will occur in Upper Makefield Township is what is known as a “validation dig” that is based on data generated by recent in-line inspection (“ILI”) tool runs performed on the Pipeline. Under PHMSA’s regulations at 49 C.F.R. §195.452 and *American Petroleum Institute Standard 1163 In-Line Inspection Systems Qualifications* (“API 1163”), as the pipeline operator, SPLP evaluates the ILI tool run data for accuracy and then determines the next steps that must be taken under PHMSA’s integrity management regulatory requirements. One of the next steps is often what is known as a “validation dig” – which is when the pipeline operator selects certain locations to validate the data provided by the ILI tool run, to confirm the data is accurate, and determine how well the ILI tool run performed. A “validation dig” is a method used to confirm the accuracy of the ILI tool run data, including to confirm the type and dimension of an identified anomaly or feature. The terms “anomaly” and “feature” are technical terms of art in the pipeline industry that are defined by *API 1163*, which is a standard adopted by PHMSA. Under *API 1163* “anomaly” is defined as a “possible unexplained deviations from the norm in sound pipe material, coatings, or welds,” and a “feature” is defined as “any physical object detected by an ILI system.” Crucially important – the terms “anomaly” and “feature” ***do not mean that there is a condition that is a critical threat to the safety or integrity of the pipeline or that the pipeline is leaking.*** The method for a “validation dig” is within the discretion of the pipeline operator, and can be either through *in situ* visual observation, or by a physical method including cutting out and removing the anomaly or feature and sending it for metallurgical laboratory analysis. There is one (1) property in Upper Makefield Township where SPLP will be performing a “validation dig,” which is planned to occur in October, contingent upon receiving any necessary permits.

Another type of work that will occur in Upper Makefield Township is the inspection of potential repairs based on the data generated by the ILI tool runs. A potential repair can include excavation digs, repairs, and cut outs of a section of the Pipeline. Under the PHMSA regulations and *API 1163*, this work is sequenced depending upon the significance of the feature that was observed in the ILI tool run data. Conditions can be one of several types, including “immediate” repair conditions, conditions that must be repaired within 60 days, and conditions that must be repaired in 180 days. ***There are no immediate repair conditions identified in Upper Makefield Township.*** There are two (2) properties in Upper Makefield Township that reflect conditions that must be inspected within 180 days. This work is planned to occur in October, contingent upon receiving any necessary permits.