



September 2, 2025

Via Electronic Mail

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**Re: Interim Site Characterization Report
eFACTS PF No. 881609
eFACTS Activity No. 60986
Twin Oaks – Newark 14”-Diameter Pipeline
Upper Makefield Township, Bucks County**

David:

In accordance with paragraph 2.b.ii of the Department’s March 6, 2025 Order (the “Order”), and the Implementation Schedule required by paragraph 2.b of the Order, which schedule was approved by the Department on April 14, 2025, Sunoco Pipeline LP (“SPLP”) submits the attached Interim Site Characterization Report to the Department.

Pursuant to SPLP’s Public Involvement Plan, an electronic copy of the Interim Site Characterization Report is being posted to SPLP’s dedicated website: <https://uppermakefield.incidentupdates.com/>, and a hard copy will also be available for review at the Upper Makefield Township Building. Advanced public notice of the submission of the Interim Site Characterization Report was previously made by publication in the Bucks County Courier Times, by posting to SPLP’s dedicated website, and also by email notification to the established distribution list. SPLP will host an in-person public meeting at 7:00 p.m. on Monday, September 15, 2025 at the Crossing Church (895 Wrightstown Rd, Washington Crossing, PA 18977) to receive public comments on the Interim Site Characterization Report. Comments can also be submitted by email to uppermakefieldresponse@energytransfer.com, by phone at 877-397-3383, or submitted by mail to SPLP’s office at 525 Fritztown Road, Sinking Spring, PA 19608.

SPLP also takes this opportunity to respond to parts of the Department’s August 29, 2025 letter, which approved the Site Characterization Work Plan. As a reminder, SPLP originally submitted the Site Characterization Work Plan to the Department on April 18, 2025, and re-submitted the document on June 27, 2025, with revisions and responses to comments received from the Department and the public. While the Department’s August 29, 2025 letter approved the

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Site Characterization Work Plan, the Department also for the first time provided written comments on the document, which was submitted on June 27, 2025 – more than two months ago.

More specifically, in addition to approving the Site Characterization Work Plan, the Department’s August 29, 2025 letter also provided three comments, “for consideration in future reporting,” and then asks that SPLP address two of the three comments essentially immediately, rather than within the 45-day time period established by paragraph 3 of the Order. Indeed, two of the three Department comments request that SPLP incorporate responses and information in SPLP’s submission of the Interim Site Characterization Report, which per the approved Implementation Schedule, was due September 2, 2025 – less than a full business day after the Department first provided the comments, on the Friday morning before the Labor Day Holiday Weekend. Nevertheless, SPLP responds to each of the Department’s three comments as follows:

DEP LoD Comment #2 – DEP Comment on SPLP Response: *The response provided by SPLP constitutes an initial evaluation of the potential migration of contaminants related to the pipeline release into residential septic systems. DEP requests that SPLP include this evaluation in the Interim Site Characterization Report along with scientific evidence or calculations supporting the claim that “contaminants in the dissolved phase that could have hypothetically been pumped from wells prior to the installation of POET systems and flowed into the septic system would have adsorbed to the organic material in the septic tank.”*

SPLP Response: SPLP acknowledges the Department’s comment and again notes that the Department waited until Friday, August 29th – less than a full business day before the Interim Site Characterization Report was due – to request that this information be included in that submission. Given SPLP’s receipt of the Department’s request on the eve of the submission deadline, SPLP will provide the requested information to the Department through a separate transmittal.

DEP LoD Comment #12 – DEP Comment on SPLP Response: *DEP acknowledges that manual gauging was performed at domestic potable wells to monitor water levels during the installation of monitoring wells documented in the Site Characterization Work Plan. However, to adequately evaluate the complex hydraulic conditions of a fractured bedrock aquifer with well over 50 domestic potable wells pumping daily and the effects of this pumping on the fate and transport of contaminants related to the pipeline release, a more robust evaluation of hydraulic conditions is warranted.*

Now that SPLP has established a well network with no access restrictions, DEP strongly recommends that SPLP install transducers in all recently installed monitoring and recovery wells, to include monitoring well clusters MW-1S/D through MW-10S/D, recovery wells RW-1 through RW-4, and the former domestic potable well located on the property at 108 Spencer Road, and to collect water level data to support continued site characterization.

SPLP Response: SPLP acknowledges the Department’s comment. As stated in Section 4.5.4 of the attached Interim Site Characterization Report, SPLP is in the process of developing a work plan to perform a water level study that will be conducted using datalogging pressure transducers installed in the 20 monitoring wells. Transducers have already been installed in the four recovery wells, and the domestic potable well at 108 Spencer Road.

Mt. Eyre Task Force Comment #2 – DEP Comment on SPLP Response: *DEP agrees with SPLP’s assertion that sharing data and information collected from private properties publicly, including analytical data from private drinking water supply wells, is not prudent. However, DEP requests that SPLP include all information and data collected to date from recovery wells RW-1 through RW-4 and monitoring well clusters MW-1S/D through MW-10S/D, as available at the time of submittal, on a figure(s) included in the Interim Site Characterization Report due on September 2, 2025. The report should also include data tables of all private well data with addresses redacted from the public version.*

SPLP Response: SPLP acknowledges the Department’s comment and appreciates the Department’s agreement that sharing information regarding private properties is not appropriate or prudent and that such information should be redacted from the public version of the Interim Site Characterization Report. The attached Interim Site Characterization Work Plan includes water level data obtained from recovery wells RW-1 through RW-4 and monitoring Wells MW-1S/D through MW-10S/D that was available as of August 13, 2025, and laboratory analytical data for those same wells that was available as of August 29, 2025. Figure 3-7 reflects the locations of each recovery well and monitoring well, and Figure 4-3 provides an initial shallow groundwater contour map based on data available as of August 13, 2025. The data tables from private well sampling performed through August 15, 2025 is included as Appendix P to the Interim Site Characterization Report, which tables have been redacted as suggested by the Department.

Thank you,



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