



Comment-Response Document

January 5, 2026 Response to PADEP Letter of Deficiency on Interim Site Characterization Report (September 2, 2025)

eFACTS PF No. 881609; eFACTS Activity No. 60986

Twin Oaks – Newark 14”-Diameter Pipeline – Upper Makefield Township, Bucks County

Sunoco Pipeline LP (“SPLP”) provides this comment-response document for the public comments that SPLP received on its January 5, 2026 Response to PADEP’s Letter of Deficiency (the “January 5th Response”) on the Interim Site Characterization Report (“ISCR”), which SPLP submitted to the Department on September 2, 2025, in accordance with paragraph 2.b.ii of the Department’s March 6, 2025 Administrative Order (the “Order”).

Public comments were received in writing through the dedicated email address, uppermakefieldact2@energytransfer.com, via U.S. Mail, or were submitted directly to PADEP and transmitted to SPLP. Each written comment received is provided verbatim below, together with SPLP’s response.

#	Commenter	Public Comment	SPLP Response
1	Upper Makefield Township	<p><u>Date of Start of Pipeline Leak</u></p> <p>In February 2025, the Pipeline and Hazardous Materials Safety Administration ("PHMSA") issued a Notice of Proposed Safety Order ("NOPSO") to SPLP. PHMSA's NOPSO advised:</p> <p><i>"PHMSA's ongoing investigation indicates that conditions may exist on the Twin Oaks Pipeline that pose a pipeline integrity risk to public safety, property, or the environment. Specifically, PHMSA's preliminary investigation indicates that the Pipeline experienced a leak in a high consequence area for at least 16 months, resulting in the release of jet fuel that has migrated into several adjacent water wells and caused additional impacts to property and the environment."</i></p>	<p>SPLP acknowledges the Township’s comment and understands that the Township has submitted a FOIA request to PHMSA to obtain a copy of the Failure History Evaluation. SPLP further notes that this comment provides a narrative that does not request any specific content in the revised ISCR that will be submitted by SPLP.</p> <p>SPLP does, however, want to take this opportunity to remind the Township that the Failure History Evaluation contains confidential security information of a pipeline asset that is protected from disclosure under the Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6) and related regulations (52 Pa. Code §§ 102.1-102.4). The disclosure of confidential security information subjects an individual, including a public official or public employee, who acquires and discloses that information to a misdemeanor</p>

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	<p>PHMSA's NOPO references three odor complaints from Township residents:</p> <ul style="list-style-type: none"> • February 13, 2025 • June 28, 2024 • July 21, 2024. <p>On January 31, 2025, SPLP confirmed a leak from the Twin Oaks Pipeline.</p> <p>SPLP's responses to PADEP's Letter of Deficiency states:</p> <p><i>"Based on a review of currently available information, SPLP has determined that the earliest the release from the pipeline could have begun was May or June 2024, and that this date will be included in the revised ISCR and will be used in the further development and refinement of the conceptual site model".</i></p> <p>SPLP is advised that pursuant to the Freedom of Information Act (FOIA), codified at 5 U.S.C Section 552, the UMT BOS has requested the Failure History Evaluation, required under the May 2, 2025, Consent Order and Agreement between PHMSA and SPLP. The evaluation requires SPLP to complete an investigation to determine, to the extent possible, when the failure discovered on January 31, 2025, began.</p> <p>UMT BOS has requested the Failure History Evaluation from PHMSA, to clarify the basis of SPLP's determination as to the date of the start of the pipeline leak, so that UMT BOS can continue to be responsive to residents' concerns.</p>	<p>of the second degree, which can include fines, imprisonment, and removal from office or agency employment. 35 P.S. § 2141.6.</p> <p>Likewise, the requirement to disclose information pursuant to FOIA “does not apply to matters that are...trade secrets and commercial or financial information obtained from a person and privileged or confidential.” 5 U.S.C. § 552(b)(4). Further, 18 U.S.C. § 1905 provides that the government is restricted from disclosure of confidential information like trade secrets, and an offense could bring criminal prosecution. Finally, records and information that contain sensitive security information cannot be made available for public inspection and copying pursuant to 49 C.F.R. § 1520. <i>See also</i> 49 C.F.R. § 7.23(c)(4) and 49 C.F.R. 190.343.</p>
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	<p><u>Composition of Regulated Substances Released to the Environment</u></p> <p>UMT BOS reiterates its request that SPLP provide the results of forensic analysis of LNAPL to the Township Manager, so that the Township can be responsive to residents' concerns and that the forensic analysis be included in the revised ISCR report.</p>	<p>As stated in the January 5th Response, SPLP will include a summary of LNAPL forensic analyses in the revised ISCR.</p>
	<p><u>Extent of LNAPL</u></p> <p>SPLP comments that LNAPL has not been observed in any of the 26 monitoring wells that have been installed to date.</p> <p>UMT BOS agrees with PADEP that the extent of LNAPL has not been characterized, observing that the 26 monitoring wells referenced by SPLP are shallow and deep wells installed at 13 locations (two wells per location).</p> <p>The total reported volume of the release was originally estimated to be approximately 6500 gallons and SPLP advises that there is no basis currently to revise that estimate.</p> <p>On December 8, 2025, PADEP held a virtual Public Meeting and reported that 644 gallons of product were recovered from soil remediation, and 421 gallons were recovered from private wells and recovery wells for a total</p>	<p>SPLP acknowledges the Township’s comment but disagrees with certain of the assertions and conclusions that the Township has drawn. SPLP does, however, appreciate the Township’s support for SPLP’s use of additional alternative technologies to further characterize the area of LNAPL, including its use of Mise-a-la-Masse to further delineate geological fractures. SPLP has evaluated the Township’s request for LIF logging and notes that LIF is not a recognized, reliable, or proven method to delineate LNAPL in bedrock fractures. To delineate the presence of LNAPL, SPLP has instead utilized a UV sonde (downhole) method, which is the industry standard for delineating LNAPL in bedrock fractures.</p>

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		<p>recovery of 1065 gallons or 16 percent of the total estimated release.</p> <p>With SPLP reporting an eight-month leak duration from June 2024 to January 2025, it is a reasonable assumption that a substantial volume of LNAPL remains in the subsurface as a source material for groundwater impacts.</p> <p>UMT BOS concurs with PADEP that there is insufficient evidence, currently, to support an interpretation that the LNAPL footprint is shrinking.</p> <p>An alternative interpretation is that the diminished recovery trend in RW-2 and RW-3 and the lack of LNAPL in monitoring wells is due to the less-than-optimal location of the wells relative to the LNAPL footprint.</p> <p>The Mise-A-la-Masse geophysical technique proposed by SPLP has been used for decades, primarily in the mining industry, to map conductive ore bodies in the subsurface. SPLP's consultant RETTEW reports success adapting this technology to delineate resistive bodies, including LNAPL plumes floating on the groundwater surface, and to delineate the surface orientation of water producing fractures to help site monitoring wells and recovery wells to maximize remediation.</p> <p>UMT BOS appreciates SPLP's efforts to apply alternative technologies to further characterize the area of LNAPL impact resulting from the pipeline leak to optimize the location of additional monitoring wells and recovery wells.</p>	
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	<p>In this regard, UMT BOS requests that SPLP also consider other High-Resolution Site Characterization ("HRSC") tools, specifically, Laser-Induced Fluorescence ("LIF") logging to further characterize the areal and vertical extent of LNAPL.</p>	
	<p><u>Groundwater Characterization</u></p> <p>UMT BOS agrees with PADEP that the existing monitoring well network is insufficient to characterize the vertical extent of dissolved-phase VOC contamination related to the pipeline release and that deeper monitoring wells should be installed.</p> <p>Table 1 from the May 7, 2025, Downhole Packer Test Report by GES indicates that acceptable packer seals and inflation pressures were maintained in both upper and lower packers across Zones 1-5, (total depth of 185 feet), and possibly Zone 6, (total depth of 247 feet), while the seal integrity of the lower packer in Zones 7 through 9 was questionable.</p> <p>Vertical mixing of water, from a shallow contamination source to deeper test intervals, would require decreased seal integrity from the upper packer, not the lower packer, which does not appear to be the case based on the reported data. The packer testing data indicates that seal integrity of the upper packer was maintained throughout testing, therefore, the vertical mixing interpretation presented by SPLP is questionable.</p> <p>Obtaining multiple samples throughout the pumping phase of each isolated interval (time-series sampling) is suggested.</p>	<p>SPLP acknowledges the Township’s comment but disagrees with certain of the assertions and conclusions that the Township has drawn.</p> <p>With respect to the Township’s comment regarding borehole geophysical logging and straddle packer testing, SPLP notes that it already performed borehole geophysical logging and UV logging at the supply well at the property on Walker Road. SPLP evaluated straddle packer testing of the supply well at the property on Walker Road and determined that the potential harms from the testing outweigh the limited benefits of any information that could be obtained from such testing at that property. SPLP also notes that it is utilizing other methods to delineate the presence of LNAPL and dissolved VOCs in the deeper aquifer.</p> <p>Based on SPLP’s further review of existing geophysical logging and packer testing that has been performed at the well at 108 Spencer Road and the two wells at the property on Walker Road, water bearing fractures were not observed at depth. Accordingly, additional borehole geophysical logging or packer testing at either of those locations, or at any new monitoring/recovery well installed at depth, is impractical and will not yield meaningful data.</p>

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	<p>Consistent contaminant concentrations obtained over multiple samples, while maintaining inflation pressures, would support an interpretation of deeper impact.</p> <p>The downward flow gradients observed in all packer testing intervals indicates a strong hydraulic influence exerted by the dozens of domestic supply wells in the Investigation Area, pumping in response to demand. As these wells are completed as open boreholes, given the magnitude of the release, the vertical distribution of dissolved VOCs observed during the packer testing should not be unexpected.</p> <p>It is the opinion of UMT BOS that conducting borehole geophysical logging and straddle packer testing on the supply well at 128 Walker Road, closer to the release area, will yield more meaningful data than retesting the well at 108 Spencer Road.</p> <p>The UMT BOS also recommends installing one bedrock monitoring well in close proximity to the release area and RW-2 and RW-3 to a total depth of not less than 250 feet and three other bedrock monitoring wells, in the Investigation Area, to a total depth of not less than 250 feet, with locations determined by bedrock structure, and integrating the results of the Mise-A-la-Masse study.</p> <p>Borehole geophysical logging and packer testing should be conducted on each well. Transducers should be installed above, between, and below each interval to determine the distribution of hydraulic head in the formation adjacent to the well. Data logging pressure transducers installed in the</p>	<p>Using the data generated from its Mise-a-la-Masse geophysical investigations, SPLP selected the locations of additional monitoring/recovery wells. During the week of February 23, 2026, SPLP installed 2 additional wells at a property on Spencer Road (i.e., MW 14-S and MW 14-D).</p> <p>The data generated from the Mise-a-la-Masse geophysical investigations, together with all prior field data, is being used to inform the final location of eight (8) additional monitoring and recovery wells that SPLP is planning to install beginning in April 2026:</p> <ul style="list-style-type: none"> - two (2) paired monitoring wells to the north of the release area, at approximate depths of 25 feet and 75 feet, respectively; - one (1) recovery or monitoring well that will be installed in close proximity to the release area, at an approximate depth of 70 feet; - one (1) monitoring well that will be installed in close proximity to the release area, at an approximate depth of 150-160 feet; - two (2) recovery or monitoring wells to the south of RW-2 along Glenwood Drive near the intersection with Walker Road, at approximate depths of 70 feet; and, - two (2) monitoring wells adjacent to RW-2 and RW-3, that will be installed to depths of approximately 150-160 feet. <p>SPLP has evaluated and will continue to evaluate both the lateral and vertical extent of groundwater contamination</p>
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		<p>monitoring well network, recovery wells, and converted domestic supply wells should be activated during the packer testing to log water level changes in response to pumping of each isolated interval.</p> <p>Water samples should be obtained from each isolated interval to determine the vertical distribution of dissolved phase contaminants.</p> <p>The vertical extent of contamination must be also be considered while evaluating the feasibility of installing one or more water supply wells, as a source alternative water supply for the neighborhood.</p>	<p>as part of the Act 2 remedial process; however, SPLP has already responded to the Township regarding its request regarding the proposed alternative water supply.</p>
		<p><u>Groundwater Flow Direction</u> UMT BOS recommends that the data generated by the water level monitoring program and pulse testing conducted by SPLP be used, in conjunction with the results of the Mise-A-la-Masse study to locate the additional deep bedrock monitoring wells described above to refine the understanding of groundwater flow in the Investigation Area.</p>	<p>SPLP has utilized all data, including, but not limited to, transducer data, data generated during single-well aquifer testing (i.e., pulse testing), the results of the Mise-a-la-Masse geophysical investigations, and all prior field investigations and data collections to select the location of the additional monitoring/recovery wells that are described in response to the Township’s comment above.</p>
2	Tom Sands	When is a 70 year old pipeline finally done ???	This comment does not relate to the Jan. 5 th Response.
3	Marilyn Drucker and Paul Thompson	<p>Dear Energy Transfer,</p> <p>Thank you for your continued commitment to remediate the pipeline leak in our community. We are wanting to learn more about the migration of your product in the ground water from the testing data of the monitoring wells. We are wanting to learn specifically how much fuel and far the fuel has migrated out of the Mt. Eyre neighborhood as it heads to the Delaware River. We are wanting to learn how</p>	<p>This comment does not directly relate to the Jan. 5th Response; however, SPLP notes that the monitoring well data that existed at the time of the preparation of the ISCR was provided and summarized in the ISCR in September 2025. Since that submission, additional monitoring wells have been installed, additional monitoring well samples have been collected and analyzed, and additional information and data regarding SPLP’s recovery of</p>

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		<p>migration of fuel can be contained so that neighborhoods outside of Mt. Eyre can be prevented from having contamination of their private wells. We are wanting continued communication and presentation of this data on a monthly basis.</p>	<p>LNAPL and the delineation of dissolved phase petroleum compounds in groundwater is continuing to be developed, is reported to PADEP daily (Monday-Saturday), has been summarized in quarterly Remedial Action Progress Reports, and will presented in the revised ISCR. SPLP’s submissions to PADEP are available on SPLP’s Incident Response website.</p>
<p>4</p>	<p>“Mt. Eyre Manor Task Force” (via email from Kimberly Bombery Smith)</p> <p>Comments Provided in Letter</p>	<p>To Whom It May Concern,</p> <p>In response to Sunoco’s January 5, 2026, Response to PADEP’s Letter of Deficiency on the Interim Site Characterization Report (“Sunoco Response”), the Mt. Eyre Task Force—comprising more than 30 residents of the Mt. Eyre neighborhood—requests that the Interim Site Characterization Report (“ISCR”) plan be revised to incorporate the items outlined below. These requests are made to ensure greater transparency, accountability, and effectiveness in the remediation process.</p> <p>After reviewing the Sunoco Response, the Task Force has significant concerns that the investigation remains incomplete and that certain conclusions are being drawn before key questions have been fully evaluated. These concerns are even more acute in light of the Remedial Action Progress Report #4, which confirms that benzene, dissolved lead, and 1,2,4-TMB have been detected in certain monitoring wells.</p> <p>As previously stated, Sunoco has not met the community’s expectations in acting with urgency to remediate this situation. From our perspective, the ongoing lack of</p>	<p>SPLP agrees that characterization activities are ongoing as is the analysis of the data that is being generated through those activities. As this commenter is aware, the ISCR was submitted pursuant to the Department’s March 6, 2025 Administrative Order, which required SPLP to submit an “interim characterization” report. The ISCR described the characterization activities that had been completed by the time it was submitted to PADEP in September 2025, and specifically described certain further field work that remains ongoing. With respect to acting with urgency, SPLP refers to its response below to the introductory comment received from Senator Santarsiero and Representative Warren. In terms of transparency, SPLP notes that its submissions to PADEP are available on the Incident Response website.</p>

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	<p>transparency has only deepened our concerns about our properties and the health, safety, and well-being of our families. Therefore, the following items are requested to be addressed in connection with the ISCR and the Sunoco Response.</p>	
	<ul style="list-style-type: none"> • Provide a clear explanation as to why there was a lack of transparency and delay in making the Sunoco Response available for the public comment period, pursuant to the PA DEP public involvement plan <ul style="list-style-type: none"> ○ To our knowledge, the Sunoco Response was not made available for public review and comment on January 5, 2026, as required, and it remains unclear why this occurred or how it affects the overall remediation process. Under the PA DEP public involvement plan, the community understood that a 30-day public comment period was to begin on January 5, yet it appears that SPLP did not issue any notice to the public regarding this opportunity until February 18, 2026. As a result, residents directly affected by the contamination were not provided a timely opportunity to participate, as required by the PA DEP. From the community’s perspective, this failure to appropriately notify the public risks further delaying remediation efforts and continues the pattern of slow progress in addressing the contamination. We request that Sunoco clarify how this lapse impacts the remediation timeline and specify how residents will be properly informed of the 	<p>SPLP has been providing public access to documents and public comment periods in accordance with its PADEP-approved Public Involvement Plan (revised June 2, 2025) (the “PIP”). The PIP does not require providing a public comment period for the January 5th Response. The PIP requires “Providing access to public documents that are submitted to the Pennsylvania Department of Environmental Protection,” and SPLP posted the January 5th Response on its dedicated Incident Response website. The PIP requires providing public comment periods for “site characterization and remedial action plans and reports, all Act 2 reports and requests, and all addendums and responses to PADEP decision and comment letters.” The “responses to PADEP decision and comment letters” language in the PIP was intended to capture substantive technical submittals that are not addenda to prior reports, but that are submitted in response to a PADEP decision or comment letter. The January 5th Response was not a report, an addendum to a report, or a detailed substantive technical submittal - it was a response to PADEP’s comments regarding SPLP’s planned additional field work to complete site characterization, the results of which will be presented in a revised ISCR.</p> <p>In response to PADEP’s request, however, SPLP provided a 30-day comment period for the January 5th Response that</p>

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	<p>public comment period moving forward to ensure compliance with the public involvement requirements.</p>	<p>began on February 18, 2026, as noted by this commenter. SPLP and PADEP are currently discussing whether to amend the PIP to clarify which submittals are subject to formal comment, but SPLP also notes that SPLP will continue to consider any comments it receives regarding any of the documents posted on its dedicated Incident Response website.</p>
	<ul style="list-style-type: none"> ● Provide data that supports Sunoco’s assessment of when the leak began and how much leaked <ul style="list-style-type: none"> ○ Sunoco states that the release may have begun in May or June 2024. However, the technical basis for this estimate has not been disclosed, and the Task Force requests that this information be promptly provided. The estimated leak start date is seemingly a critical data point that directly influences cleanup strategy, plume modeling, and long-term risk assessments, and therefore should be transparent. 	<p>As noted in prior responses to public comments, SPLP is focused on characterizing, delineating, and remediating the impacts caused by the release to meet PADEP’s residential statewide health standard medium specific concentrations. The exact date of the release is not a determining factor as to whether that end goal has been met, but SPLP indicated that it will use the time period identified in the January 5th Response for the revised ISCR and in the further development and refinement of the conceptual site model. SPLP has provided a conservative estimated release volume of 156 barrels, and currently available information does not warrant revising that estimate.</p>
	<ul style="list-style-type: none"> ● Provide clarity on the Extent of LNAPL <ul style="list-style-type: none"> ○ There appears to be a significant data gap that should have been identified in the ISCR, and the Sunoco Response does not satisfactorily address this deficiency. SPLP should have included a plan for further characterization of the extent of LNAPL, particularly given that no known monitoring wells were installed directly beneath the confirmed release area. Additional wells are seemingly needed both near the source 	<p>SPLP acknowledges this comment but disagrees with certain of the assertions and conclusions that the commenter has drawn, including that there was a “data gap” that should have been identified in the ISCR. Nevertheless, the January 5th Response specifically described additional characterization work that SPLP was planning and that would inform the location of additional planned wells. That work has either been completed or is currently in progress, as described above in the response</p>

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	<p>and in downgradient areas to accurately determine the full extent of contamination.</p>	<p>to Upper Makefield Township’s “Groundwater Characterization” comment.</p>
	<ul style="list-style-type: none"> • Conduct deeper and depth-specific testing to understand potential deep groundwater impacts <ul style="list-style-type: none"> ○ It is our understanding that elevated benzene concentrations have been detected at depths reaching approximately 460 feet. Some residential wells draw drinking water from similar depths, while existing monitoring wells installed by Sunoco extend only to about 75 feet. Sunoco’s explanation that the deeper detections are merely testing artifacts has not, from the community’s perspective, been conclusively demonstrated. Accordingly, deeper and depth-specific testing is seemingly required before any conclusion can be made that deeper aquifers remain unaffected. 	<p>This comment appears to be premised upon data obtained from a single packer test at 108 Spencer Road. Further, as noted in Upper Makefield Township’s comments above, the reliability of the results from the deep intervals of that packer test may be questionable. SPLP is therefore performing additional site characterization to evaluate groundwater at depths greater than 75 feet through the installation of deeper wells, as described in SPLP’s response to the Township’s “Groundwater Characterization” comment above.</p>
	<ul style="list-style-type: none"> • Complete a thorough groundwater flow evaluation to understand how contamination may migrate over time <ul style="list-style-type: none"> ○ It appears that groundwater movement within fractured bedrock systems can shift due to seasonal conditions and the influence of residential well pumping. However, updated fulsome and complete monitoring data was not included in the original report, seemingly limiting the ability to accurately assess groundwater flow dynamics and evaluate how contamination may migrate over time. 	<p>As noted above, the ISCR was an “interim characterization” report that described the characterization activities that had been completed by the time it was submitted to PADEP in September 2025, and specifically described certain further field work that remains ongoing, including additional site characterization data that is being used to further develop and refine the conceptual site model.</p>

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	<p>In addition to the modification of requests to the ISCR and Sunoco’s response noted above, the Task Force is once again requesting in-person public meetings immediately. There have been no recent Tele-Town Halls and Zooms run by Energy Transfer, and the residents are owed an update. The Tele-Town Halls and Zooms run by Energy Transfer in the past were not a satisfactory format, as they seemingly enabled Sunoco to hand-pick questions to answer, paraphrase resident questions, and do not allow for follow-up questions. Given that it appears ET monitors, screens, and modifies the questions when answering them, there must be additional opportunities provided to residents to address their concerns thoroughly and in real time. This is the only way for residents to ensure that ET is acting with urgency, transparency, and in the best interests of the community as they work to clean up this evolving environmental catastrophe.</p> <p>Thank you for taking these requests into consideration.</p> <p>Sincerely, Mt. Eyre Task Force</p>	<p>This is not a comment regarding the January 5th Response; however, SPLP will continue to provide for public participation in accordance with the PADEP-approved PIP.</p>
<p>Comments provided in Follow-up Email</p>	<p>Questions in Addition to ISCR Response:</p> <ol style="list-style-type: none"> 1. Why isn't Suburban proactively offering to change out the carbon as part of their annual maintenance? How is this not an expectation of the services that are being provided? Why isn't this built into the services contract? 2. Why isn't Suburban proactively installing lead filters when we've seen an increase in lead amongst residents? 	<ol style="list-style-type: none"> 1. This comment does not relate to the January 5th Response. 2. This comment does not relate to the January 5th Response.

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		<p>3. How and when will the results be shared with residents from the Mise-a-la-Masse testing, and how is this being built into the remediation plan? How was it scientifically determined that the most recent wells drilled on Spencer were the best location to drill wells? At what depths were they drilled? Was this based on the Mise-a-la-Masse data?</p> <p>Please provide us with clarity on the task force questions and concerns.</p>	<p>3. The results of the Mise-a-la-Masse geophysical testing that was performed during the months of January-February 2026 are in the process of being analyzed and will be presented in a future report that will be submitted to PADEP. The results of the Mise-a-la-Masse for individual properties will be sent directly to each landowner where testing was performed. Further, as noted above in response to Upper Makefield Township’s “Groundwater Characterization” comment, SPLP is using the additional data from the Mise-a-la-Masse geophysical testing, which was consistent with the prior field data previously obtained, to inform the location of the additional wells that it is installing. For example, the most recent pair of monitoring wells that were installed at a private property on Spencer Road (i.e., MW 14-S and MW 14-D) were located based on the results of the Mise-a-la-Masse geophysical testing, together with evaluation of other data obtained to date, including, but not limited to, transducer data, data generated during single-well aquifer testing (i.e., pulse testing, and all prior field investigations and data collections. MW14-S was drilled to a depth of 40 feet and MW 14-D was drilled to a depth of 75 feet.</p>
5	<p>Senator Santarsiero and Representative Perry Warren</p>	<p>Dear Secretary Shirley,</p> <p>We are submitting this letter as our public comment on Sunoco Pipeline, LP's (SPLP) January 5, 2026 response to Pennsylvania Department of Environmental Protection's (DEP) November 21, 2025 Interim Site Characterization Report Deficiency Letter. We appreciate the detail DEP</p>	<p>SPLP disagrees with the premise of this comment that suggests SPLP is not completing site characterization efforts in an expeditious manner. As SPLP stated previously, including in a June 25, 2025 response letter to State Senator Santarsiero and Representative Warren, site characterization to evaluate the impacts of a release is an iterative process that requires sufficient time to complete.</p>

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	<p>provided in identifying the deficiencies in SPLP's response plan. We ask DEP to hold SPLP to the highest standard to ensure the final site characterization work comprehensively assesses the scale and scope of the release and its impact on the environment and the health and safety of the Mt. Eyre community. Further, we respectfully request this work be done in a more expeditious manner, recognizing the extensive health risks and inconvenience experienced by the community members for going on 14 months.</p> <p>We acknowledge SPLP's agreement to include additional details, data, and information related to the Date of the Start of the Leak, Septic Systems, and Forensic Analysis in the final version of the report. We look forward to reviewing the Septic System Migration Pathway Evaluation and the summary of the LNAPL forensic analysis, and any details that support the conclusion around the start of the pipeline leak.</p>	<p>PADEP, and the Act 2 regulations, expressly acknowledge the iterative process that is required to complete investigation, characterization, and remediation efforts. SPLP also notes that it has met all the timeframes and deadlines established by PADEP’s March 6, 2026 Administrative Order, and has performed significant field work over the last year, as reflected in the ISCR and 90-day Remedial Action Progress Reports.</p>
	<p><u>Date of Start of Pipeline Leak:</u></p> <ol style="list-style-type: none"> 1) We question SPLP's conclusion that the leak started in May or June 2024 given the reports of gaseous odors prior to those dates. We support Upper Makefield Township's (the Township) request for the Failure History Evaluation from PHMSA. 2) We also have concerns about the projected volume of product released. If odors were present prior to May 2024, it is likely that the leak started prior to May 2024 and that the volume of product leaked exceeds the current projections. 	<ol style="list-style-type: none"> 1) <i>See</i> SPLP’s response to Upper Makefield Township’s comment on this topic above. 2) <i>See</i> SPLP’s response to the “Task Force” comment on these topics above.

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	<p><u>Extent of LNAPL (Light non-aqueous phase liquid)</u></p> <ol style="list-style-type: none"> 1) We share the PADEP's concern that the extent of LNAPL has not been characterized. Neither the recovery wells nor the monitoring wells are at sufficient depths to identify the released product, nor are they installed below the release location. 2) As product continues to be recovered from the supply well at 128 Walker Drive, it seems there is an inconsistency between the data provided from the monitoring and recovery wells and the reality of the supply well at 128 Walker Drive. We suggest additional monitoring and recovery wells be installed in this area. 	<ol style="list-style-type: none"> 1) <i>See</i> SPLP’s response to Upper Makefield Township’s comment on this topic above. 2) SPLP does not understand this comment as worded but specifically notes the January 5th Response (to which this comment is written), indicated that SPLP intended to install additional recovery or monitoring wells in this area. <i>See</i> SPLP’s response to Upper Makefield Township’s comments above for additional information about the eight (8) additional recovery or monitoring wells that SPLP is planning to install in this area.
	<p><u>Groundwater Characterization:</u></p> <ol style="list-style-type: none"> 1) We share the DEP's concerns that the ISCR did not substantially characterize the horizontal extent of groundwater contamination. We appreciate SPLP's willingness to perform Mise-A-La-Masse geographical testing but remain concerned that the current locations and depths of the monitoring wells are not sufficient to fully evaluate the breadth and depth of the extent of the contamination. 	<ol style="list-style-type: none"> 1) <i>See</i> SPLP’s response to Upper Makefield Township’s comment on this topic above.
	<p><u>Upper Makefield Township Board of Supervisors and Mt. Eyre Task Force</u></p> <ol style="list-style-type: none"> 1) We echo and amplify all the comments and requests provided by the Township and the Task Force. 	<ol style="list-style-type: none"> 1) No response required.

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		<p>Site Characterization is a critical step in understanding the impact of this spill on the environment and the residents in the Mt. Eyre neighborhood and beyond. It is troubling that this work has not been completed nearly 14 months after SPLP first acknowledged the release. It is critical that the final site characterization is complete and transparent, and that it provides this community with the assurance that all contamination will be cleaned up.</p> <p>Thank you for the opportunity to provide comment.</p>	<p>This is not a comment on the January 5th Response; however, SPLP’s refers to its response to the introductory comment above regarding the timeliness of its characterization work. With respect to transparency, SPLP notes that its submissions to PADEP are available on the Incident Response website, and SPLP is implementing the PADEP-approved PIP, both of which provide the public with access to information regarding the remedial process.</p>
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