



September 11, 2025

Via Electronic Mail

Gregg Schuster
Township Manager
Upper Makefield Township
1076 Eagle Road
Newtown PA 8940
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**Re: Mount Eyre Water System Alternatives Study - CKS Engineers Proposal
Upper Makefield Township, Bucks County**

Gregg:

This letter responds to your September 4, 2025 email correspondence to representatives of Sunoco Pipeline LP (“SPLP”), which provided SPLP a copy of the *“Mount Eyre Water System Alternatives Study - Proposal for Consulting Engineering Services”* prepared by CKS Engineers for Upper Makefield Township (the “Proposal”). You requested that SPLP provide feedback on the Proposal, and further restated the Township’s request that SPLP pay for the study outlined in the Proposal. The Proposal identifies that the “purpose of the study is to evaluate possible long-term solutions to supply uncontaminated water meeting State and Federal requirements of the Safe Drinking Water Act¹ to the residents of the area.”

SPLP respectfully disagrees that the study outlined in the Proposal is warranted. Most importantly, the stated goal of the Township’s proposed study has already been met. SPLP has already installed or reimbursed landowners for nearly 200 point of entry treatment (“POET”) systems at residences in the Mt. Eyre Manor neighborhood and beyond. POET systems that include granular activated carbon (“GAC”) treatment – which the POET systems installed or reimbursed by SPLP include – are the most common and proven effective approach to treating groundwater to remove volatile organic compounds (“VOCs”). POET systems that include GAC

¹ As the Township and CKS Engineers (the Township’s water consultants) are likely aware, the quality of private well water is not regulated under the federal Safe Drinking Water Act nor by any state law administered by the Pennsylvania Department of Environmental Protection (“PADEP”) – as such regulation is limited to public drinking water systems. See EPA – Safe Drinking Water Act, available at <https://www.epa.gov/sdwa> (reflecting that SDWA regulates public drinking water supplies); see also PADEP – General Information About Private Wells, available at <https://www.pa.gov/agencies/dep/residents/my-water/private-wells> (“Does the state of Pennsylvania regulate private homeowner wells? No. The PA Department of Environmental Protection (DEP) does not regulate private wells.”).

treatment are acknowledged by both PADEP² and EPA³ as an appropriate and effective remedial mechanism to treat contaminated groundwater, and POET systems with GAC treatment are in use at hundreds of cleanup sites nationwide.⁴ In fact, CKS Engineers acknowledges the appropriateness of utilizing POET systems with GAC treatment since one of the alternatives identified in the Proposal specifically provides that the “use of point of entry treatment systems may continue with this option.”

Thus, because the POET systems that are already installed provide the “long-term solutions to supply uncontaminated water” to residences in the Mt. Eyre Manor neighborhood, no additional study or evaluation of any alternatives are necessary.

Moreover, the alleged impacts are not as broad or widespread as the Township has suggested as a predicate need for the study. As of September 8, 2025, SPLP has sampled 364 private water wells, and performed a total of 1,333 individual sampling events. Since SPLP began its sampling efforts in mid-January 2025, only eight (8) properties have ever had a detection of VOCs that exceeded PADEP’s residential statewide health standards medium-specific concentrations (“SHS MSCs”), or had light nonaqueous phase liquid (“LNAPL”) present in the well – and all of those properties were within 1,250 feet of the pipeline release location. As of September 8, 2025, that number is down to only four (4) properties that are located within approximately 150 feet of the pipeline release location. POET systems have been installed at each of these properties, as well as the hundreds of other properties in the Mt. Eyre Manor neighborhood and beyond. In fact, the vast majority of the nearly 200 POET systems were installed at properties where there are no identified impacts to groundwater related to the pipeline release, but SPLP nevertheless installed or reimbursed for POET systems in this broader area as a prophylactic measure and out of an abundance of caution.

² See, e.g., PADEP – Citizen’s Guide to Home Drinking Water Treatment Devices (10/2005), available at <https://www.montgomerycountypa.gov/DocumentCenter/View/931/DEP---Citizens-guide-to-drinking-water-treatment> (describing GAC treatment systems and effectiveness for removing VOCs); see also PADEP – Citizen’s Guide to Volatile Synthetic Organic Chemicals in Drinking Water (8/2005), available at <https://www.montgomerycountypa.gov/DocumentCenter/View/916/DEP---Citizens-guide-to-VOC-treatment?bidId=> (same); see also 25 Pa. Code §109.1 *et seq.*, Pennsylvania Safe Drinking Water Act regulations (recognizing GAC as approved treatment method for public drinking water systems).

³ See, e.g., EPA 815-B-09-007, *Water Treatment Technology Feasibility Support Document for Chemical Contaminants for Second Six-Year Review of National Primary Drinking Water Regulations* (Oct. 2009), available at https://19january2021snapshot.epa.gov/sites/static/files/2014-12/documents/water_treatment_technology_feasibility_support_chemical_contaminants_6yr2.pdf (establishing GAC systems as the Best Available Technology and treatment technique for public drinking water systems).

⁴ See EPA Community Guide to Granular Activated Carbon Treatment, available at <https://semsub.epa.gov/work/HQ/401595.pdf> (stating “GAC treatment is the most common approach to treating contaminated groundwater and soil vapor. GAC units can be brought to the site and set up relatively quickly, eliminating the need to transport contaminated water for offsite treatment. GAC has been selected for use at hundreds of Superfund sites and other cleanup sites across the country.”).

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Because the impacts to groundwater from the pipeline release are limited to only a handful of properties that are located in a discrete area in immediate proximity to the release location, and where POET systems have already been installed – SPLP does not agree with the Township's position that the proposed study is either necessary or appropriate. As a result, SPLP again declines the Township's request to fund the proposed study.

Thank you,

A handwritten signature in blue ink, consisting of a series of loops and a sharp peak, followed by a horizontal line.

Matthew Gordon
Vice President of Operations
Energy Transfer