

**Comment-Response Document
Remedial Action Plan (June 19, 2026)
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 the Remedial Action Plan (“RAP”), which SPLP submitted to the Department on June 19, 2026, in accordance with paragraph 2.b.iii of the Department’s March 6, 2025 Administrative Order (the “Order”), the Proposed Implementation Schedule approved by PADEP on April 14, 2025, and the Interim Site Characterization Report (“ISCR”) approval letter issued by PADEP on April 22, 2026.¹

Public comments were received and responded to orally during the July 8, 2026 in-person public meeting. A transcript of July 8, 2026 in-person public meeting, which contains the oral public comments received as well as SPLP’s responses, is available on the dedicated incident response website at the following link:

<https://uppermakefield.incidentupdates.com/wp-content/uploads/sites/2/2026/07/070826-54968-RAP-PUBLIC-MEETING.pdf>

Public comments were also 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 corresponding responses.

¹ SPLP notes that it is remediating the impacts of the release in accordance with the requirements of Act 2, pursuant to the Notice of Intent to Remediate that it submitted to the Department on February 13, 2025, and in accordance with the Order. SPLP also notes that while it is performing its remedial activities pursuant to Act 2, the Order required SPLP to submit certain reports that are not required under Act 2 (i.e., an ISCR and a RAP) and required SPLP to submit the RAP while site characterization activities remain ongoing (i.e., within 60 days after approval of the Interim Site Characterization Report). That sequencing is inconsistent with PADEP’s well-established remedial sequence for sites where a RAP is required (see, e.g., 25 Pa. Code § 245.311(a) requiring the submittal of a RAP after site characterization has been completed and approved). While SPLP appreciates PADEP’s desire to accelerate the remedial process, many of the comments received and responded to herein result from, or are influenced by, the fact that the Order required SPLP to submit the RAP before site characterization was complete.

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#	Commenter	Public Comment	SPLP Response
1	Liz Cook	After reviewing the Remedial Action Plan and attending the July 8 Public Meeting, I would like further clarification and information on Section 6 Remedial Pilot Testing to be included in the final plan. specifically: 1. The plan indicates the Multiphase Extraction (MPE) method includes groundwater extraction with a minimum of 2 gallons/minute (GPM) per pump from the Aquifer. At the public meeting, Energy Transfer noted that the drawdown is anticipated to be less than 2 gpm. Please provide the anticipated total quantity of water to be extracted during the test phase, and an estimated percentage of the total aquifer this equals. 2. During the meeting, Energy Transfer noted that for the test phase the extracted water would not be returned after cleaned to the aquifer but removed from site. The Plan does not provide information on how residents will receive adequate water for drinking, cooking, bathing and household tasks such as laundry if drawdown is significant enough that wells become compromised or dry as result. Please provide details about how this will be handled.	1. This question was posed at the July 8th public meeting, and SPLP responded and indicated that the total volume of water that will be extracted during the MPE pilot test will depend on the field conditions encountered and cannot be estimated at this time. <i>See Tr. at pgs. 111-12.</i> 2. This topic was raised and discussed at the July 8th public meeting, and SPLP indicated that nearby water supply wells will be monitored during the MPE pilot test to see if there are any effects on the water levels in those wells. SPLP also indicated that the MPE pilot test could be stopped if problems were being observed. <i>See Tr. at pgs. 40-42; 68-70.</i> SPLP notes that the Road Occupancy Permit Application Package that it submitted to Upper Makefield Township on August 16, 2026, contains information responsive to this comment. <i>See Pilot Test Dometic Well Monitoring Plan that is available on SPLP’s dedicated website at: https://uppermakefield.incidentupdates.com/wp-content/uploads/sites/2/2026/08/MPE-Pilot-Test-UMT-Road-Occupancy-Permit-Application-Package_08.16.2026.pdf.</i>

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2	Andrew Murray	<u>7/30/2026 (via email)</u> I live at 119 Glenwood which is directly next to this proposed test. Over the last month my system that Sunoco installed has clogged twice leaving me with no water. The filter is a mud cake that is with loaded with benzene that Sunoco expects me to change myself. It's a biohazard. Sunoco's blatant disregard has ruined my well yet again because they drilled two new wells in very close proximity to mine. Now I have a daily nightmare of when my water will cut off again. Sunoco's reply was it's my fault because my well pump is too deep. They actually said it's my fault. My fault that I have to deal with a biohazard mud cake and a spotty water supply? MY FAULT??? They have no idea what they're doing and they don't care about the person that is right next door to this proposed test. They have no plan for my water supply. Stop this test until at least somebody will interview the people next door to the test. Seems reasonable.	This comment does not relate to the content of the RAP; however, SPLP notes that it has been in active communication with this landowner to discuss the concerns expressed.
		<u>7/31/2026 (via email)</u> Before the test has even started Sunoco is claiming no responsibility for my interrupted and damaged water supply. They have no plan to provide me with water during the test or going forward. It's outrageous and their test must be stopped.	This comment does not relate to the content of the RAP; however, SPLP notes that it has been in active communication with this landowner to discuss the concerns expressed.
		<u>8/7/2026 (via email)</u> Energy transfer has ruined my well and refuses to fix my water. I've reached out multiple times about handling benzene contaminated filters. They drilled in close proximity very deeply next to my well and now my well is ruined. They actually blamed me of the depth of my well pump. Not their 70 year old pipe that leaked jet fuel for months. It's	This comment does not relate to the content of the RAP; however, SPLP notes that it has been in active communication with this landowner to discuss the concerns expressed.

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		outrageous and this test is going to happen next to my house and I don't want it because they've already ruined my well and now they're going to ruin the whole neighborhood. If they don't care about me how do they care about anyone else. I'm right next to it. I'm attaching video proof of the drilling in close proximity to my well and my well has been ruined ever since. Energy transfer says it's my fault and it's laughable.	
3.	Scott Berger	I am a resident of Upper Makefield Township. Professionally, I am a chemical engineer with nearly 50 years of experience. My career has focused on environmental engineering and process safety. I am CCPS-certified in process safety (CCPSC), a Fellow of the American Institute of Chemical Engineers, and a Fellow of the Center for Chemical Process Safety. From 2001-2015 I served as Executive Director and CEO of the Center for Chemical Process Safety (CCPS). From my study of the nature of the leak and the hydrology of the area, my home is not in an area likely to be affected by the leak. However, I am concerned about the well-being of my fellow residents, and also generally concerned about the safety of the community in general. Having read the remediation plan, I believe the remediation technology choice is likely to be the correct one. However, I believe the remediation plan overlooks several key points. 1) The quantity that was released is likely to be larger than the 6,500 gallons claimed. There was very likely a time delay between the start of the leak and the time of detection. This is because it would have taken some time for the fuel to work its way to the surface. Even after reaching the surface, it may	1) As stated in prior responses to public comments, SPLP has provided a conservative estimated release volume of 156 barrels (i.e., approximately 6,500 gallons), and currently available information does not warrant revising that estimate.

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	have taken some time for the concentration of fumes to reach the odor detection limit. Even then, as the odor grew past that limit, people may not have initially been aware of it. Therefore, residents in the area should be made aware of the possibility that the amount of fuel that needs to be removed could be more than 6,500 gallons and that extraction of the contamination could take longer than projected.	
	2) Further to the above point, if at any time it becomes clear that the quantity to be removed will exceed 6,500 gallons and/or the time the extraction process will be run will need to be extended, residents should immediately notified and provided with a revised estimate of the quantity to be removed and the amount of additional time required.	2) <i>See</i> Response to Comment No. 1 above, which is incorporated by reference. SPLP will continue its remedial activities until it has attained the appropriate cleanup standards and will keep the public informed of its remedial progress in accordance with the PADEP-approved Public Involvement Plan.
	3) As I understand the damage mechanism that led to the leak, I am concerned that the action taken to reduce the pressure in the pipeline will slow but not stop the leak. Even if this action temporarily does stop the leak, the same damage mechanism will continue to impact the area of the leak over time, leading to a renewed or new leak.	3) This comment does not relate to the content of the RAP; however, SPLP notes that the section of the pipeline where the leak occurred was excavated, cut out, and replaced. The pipeline was then tested under PHMSA oversight to confirm the effectiveness of the repair and to ensure that no additional leaks were occurring along the pipeline. These activities are described on SPLP’s incident response website at: https://uppermakefield.incidentupdates.com/background/
	4) The process of extraction will result in the need to store a quantity of recovered jet fuel on site for some period of time. I did not note the planned frequency of removing the accumulated jet fuel, but residents should be made aware that potentially thousands of gallons of a class 3 flammable material could be stored in their neighborhood, and that there	4) Ancillary activities to support the MPE pilot test proposed in the RAP, including the temporary storage and periodic removal of pumped water and light non-aqueous phase liquid (“LNAPL”), are planned to be conducted during normal working hours (between 9 a.m. and 4 p.m.). SPLP will be accumulating a maximum of approximately

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		will be some frequency of operations to load fuel from the accumulation tank(s) to trucks that come in to haul it away.	60 gallons of LNAPL at any one time, and the frequency of its removal will depend on the results of the MPE pilot testing, and in particular the rate at which LNAPL is recovered during that testing.
		5) Residents must be made aware of the potential fire and explosion consequences if the tank of recovered material leaks, or if there is a fire from an external source that impinges on the tank, or if there is an accidental release while transferring fuel from the tank to a truck, or if the truck itself has an accident in the neighborhood. Energy Transfer/Sunoco must put in place measures to address these potential scenarios should be in place, verify that these measures are effective, and train residents what to do if any such incident occurs. This may or may not be required by law under 40CFR68 and/or the General Duty Clause of the Clean Air Act Section 112(r)(1), but must be done whether required by law or not.	5) As noted above, SPLP will be accumulating a maximum of approximately 60 gallons of LNAPL at any one time during the MPE pilot test proposed in the RAP.
4	“Mt. Eyre Task Force” (via email from Kimberly Smith)	1. Transparency & Oversight 1. Approximately 65 pages of the RAP were redacted before public release. Why were they withheld, who reviewed the unredacted version, and why should the community not have access to cleanup-related information? Are unredacted versions provided to DEP and the Township regularly?	1. This question was posed at the July 8 th public meeting, and SPLP responded and indicated that the information in the RAP that was redacted on certain pages was individual property identifying information, and that the redaction in the publicly available documents was done to protect information about individual private properties. <i>See Tr. at pgs. 46-48.</i> SPLP also indicated at the public meeting that an unredacted version of the RAP was provided to PADEP. <i>See id.</i>
		2. The 2-page RAP Summary distributed to the public is far shorter than the underlying RAP. Was the Summary reviewed by PADEP for completeness, and does it omit any material	2. PADEP specifically requested that SPLP prepare the Remedial Action Plan – Summary to provide a high-level laymen’s summary of the RAP, and it is therefore not

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	findings, uncertainties, or recommendations contained in the full RAP?	intended to provide the level of detail that is available in the full RAP.
	3. What independent oversight will verify that the cleanup — not just the investigation — is complete? Will PADEP independently verify pilot results and will residents have access to raw monitoring data?	3. The remediation is being completed under the oversight of PADEP. At the conclusion of the cleanup (i.e., once the appropriate cleanup standards have been attained), PADEP will review and approve a Final Report(s) for soil and groundwater to confirm that the standards have been attained. Sampling data, and the supporting laboratory reports, for all media (soil, soil gas/vapor, and groundwater) have been provided to the PADEP in daily reports, quarterly Remedial Action Progress Reports, in the prior Act 2 submissions and submissions made pursuant to the March 6, 2025 Administrative Order, and will be included in the Final Report(s). These documents have been made available to the public in accordance with the Public Involvement Plan.
	4. Will Sunoco commit to regular public reporting, including groundwater maps, LNAPL recovery totals, pilot performance, and cleanup progress?	4. This comment does not relate to the content of the RAP; however, SPLP provides quarterly updates on all remedial activities in the Remedial Action Progress Reports, which includes groundwater maps, which are available on SPLP’s incident response website at: https://uppermakefield.incidentupdates.com/act-2-remediation-documents/
	5. Will SPLP resume regular in-person town halls with live unscreened Q&A, rather than moderated tele-town halls?	5. This comment does not relate to the content of the RAP; however, this question was posed at the July 8 th public meeting, and SPLP responded indicating that there will continue to be both in-person and tele-town hall meetings moving forward. See Tr. at pgs. 53-54.

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		2. Spill Size & Accountability	
		6. What is Sunoco’s current best estimate of the total volume of product released? If the estimate remains approximately 6,500 gallons, what evidence collected over the past 18 months supports maintaining that estimate?	6. This comment does not relate to the content of the RAP; however, as stated in prior responses to public comments, SPLP has provided a conservative estimated release volume of 156 barrels, and currently available information does not warrant revising that estimate.
		7. Will Sunoco publicly distinguish between estimated gallons released, gallons recovered, gallons remaining underground, gallons dissolved in groundwater, and gallons naturally degraded or volatilized?	7. This comment was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pgs. 55-58.
		8. The RAP Summary reports 518 gallons recovered from wells and 644 gallons through soil excavation, totaling approximately 1,162 gallons as of June 16, 2026—roughly 18% of the 6,500-gallon estimate. Will Sunoco confirm this percentage, present recovered volume against total estimated release in all future public reporting, and identify the point at which additional recovery is no longer technically feasible?	8. This comment was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pgs. 55-60. SPLP provides the total volume recovered to PADEP in daily reports submitted pursuant to the March 6, 2026 Administrative Order, as well as in in other submissions made to PADEP that are publicly available. SPLP will continue to perform remediation activities until applicable cleanup standards have been attained, in full compliance with the Act 2 regulations and the Order.
		9. Will Sunoco release the methodology used to estimate the spill volume, including pipeline pressure and flow data, leak duration assumptions, product accounting, uncertainty ranges, and remaining source-mass estimates?	9. This comment does not relate to the content of the RAP; however, as to the estimated release volume, <i>see</i> response to Comment No. 6 above, which is incorporated by reference. SPLP notes that this comment was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at 144-145. Finally, SPLP notes that this comment’s request for pressure and flow data is confidential security information of a pipeline asset that is protected from disclosure under the Public Utility Confidential Security Information

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			Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6) and related regulations (52 Pa. Code §§ 102.1-102.4).
		10. What specific data supports the leak start and total release volume, since the RAP still doesn't disclose the technical basis for the “May or June 2024 start date”?	10. This comment does not relate to the content of the RAP; however, 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 5, 2026 Response to PADEP’s Letter of Deficiency on the Interim Site Characterization Report for future reports, including the RAP, and in the further development and refinement of the conceptual site model.
		11. The RAP Summary consistently describes the released product as “jet fuel.” Will Sunoco confirm the specific grade (Jet A, JP-8, or other), the full additive package, and whether the composition has been independently verified? Does Sunoco have any more information about the mix of jet fuel and other products? Additives drive toxicity, treatability, and long-term risk, and “jet fuel” alone does not specify them.	11. This comment was raised and addressed at the public meeting. <i>See</i> Tr. at pgs. 60-62.
		12. Has the PHMSA Failure History Evaluation been released yet?	12. This comment does not relate to the content of the RAP; however, it was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pgs. 62-63. The Failure History Evaluation that was required by the PHMSA Consent Order and Agreement was submitted to PHMSA and contains confidential security information of a pipeline asset that is protected from disclosure under the Public

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		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).
	13. Why does Sunoco maintain that the PHMSA Failure History Evaluation is confidential?	13. <i>See</i> Response to Comment No. 12 above, which is incorporated by reference.
	3. Cleanup Strategy 14. The RAP identifies Multiphase Extraction (MPE) as the preferred remedy. Why was it not implemented sooner? When was it first evaluated, did PADEP recommend it earlier, and could earlier implementation have recovered more product?	14. This comment was raised and discussed at the July 8th public meeting. <i>See</i> Tr. at pgs. 38-40. By way of further answer, SPLP notes that recovery of LNAPL began immediately after discovery of the release. Interim remedial actions that included both active and passive methods (i.e., bailing, skimming, and pumping) to recover LNAPL were continued through Spring 2025, when recovery wells were installed. Beginning in June 2025, active and passive recovery of LNAPL was expanded to incorporate targeted LNAPL recovery at the newly-installed recovery wells on Glenwood Drive. The rates of recovery of LNAPL that were observed steadily declined from late-summer-early fall 2025. The use of MPE was considered as a potential interim remedial activity in August 2025 but was not viable at that time due to site access and other logistical constraints. The use of MPE was evaluated as a potential permanent remedial strategy through the RAP, which was prepared in accordance with the time frames and sequencing required by the PADEP through the March 6, 2025 Administrative Order.

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			Furthermore, PADEP, the Administrative Order, 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 Administrative Order and has performed significant field work over the last year, as reflected in the ISCR, the RAP, and 90-day Remedial Action Progress Reports. PADEP did not recommend MPE, or any other particular remedial strategy, for the recovery of LNAPL.
		15. What is the approximate footprint of the proposed equipment and housing? How often will the wells “nearby” be checked during the process? What defines “nearby”?	15. The proposed equipment for the MPE pilot test will be enclosed by sound barriers arranged in a roughly rectangular shape that will be located at the end of the cul-de-sac on Walker Road and will be approximately 40 feet wide by a maximum of 80 ft long. SPLP notes that the Road Occupancy Permit Application Package that it submitted to Upper Makefield Township on August 16, 2026, contains information responsive to this comment. The questions regarding “nearby” wells were raised and discussed at the July 8th public meeting. <i>See</i> Tr. at pgs. 40-41.
		16. What is the approximate noise level of the equipment during operation? Will the noise level warrant the use of sound barriers?	16. This comment was raised and discussed at the July 8th public meeting. <i>See</i> Tr. at pgs. 90-91. By way of further answer, SPLP notes that the equipment proposed for the MPE pilot test was evaluated by an acoustical engineering firm who designed acoustical panels that will be placed around the perimeter of the equipment. The MPE pilot

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			test operations are projected to be well below the Upper Makefield Township Noise Ordinance limits. SPLP notes that the Road Occupancy Permit Application Package that it submitted to Upper Makefield Township on August 16, 2026, contains a Sound Management Plan with information responsive to this comment.
		17. During what hours of the day, and on what days of the week, will the MPE be operational?	17. This comment was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pg. 91. By way of further answer, the MPE pilot testing is expected to run almost continuously with operations 24 hours/day for a minimum of 30 days.
		18. Why are you not considering 108 Spencer as one of your MPE sites or all the sites with higher concentrations of contamination? How were the few locations chosen and what has been communicated to the residents that will be impacted?	18. This comment was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pg. 96. Because this is a pilot test, locations were selected based on proximity to the release location, and where the majority of the LNAPL is currently present. SPLP is in direct communications with residents who are in proximity to the MPE pilot test locations.
		19. The RAP Summary states that the Multiphase Extraction (MPE) pilot is expected to operate for approximately one month and is planned for the summer or fall during low-groundwater conditions. What is the specific target month and year for initiating the pilot? When do you expect the pilot to conclude, when will the results be publicly released, and, if the pilot meets its performance objectives, what is the anticipated timeline for final design and full-scale implementation? • If the pilot extends beyond the anticipated 30-day period or generates substantially more groundwater	19. This comment was addressed at the July 8 th public meeting. <i>See</i> Tr. at pgs. 34-36, 43-44. The MPE pilot test is anticipated to begin in mid-September 2026 and conclude by November 2026. The results of the MPE pilot test will be summarized in a future submission made to PADEP and will be made available to the public in accordance with the Public Involvement Plan. If the MPE pilot test indicates that MPE will be an effective remedial option, then a system will be designed based on the parameters obtained from the pilot test, and any necessary permits and other approvals will then be obtained.

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		than expected, do you anticipate continuing to transport the recovered water off-site for treatment and disposal, or will you evaluate on-site treatment and discharge, subject to the appropriate permits and regulatory approvals? What criteria will be used to make that decision? • If the MPE pilot is successful, what is the anticipated timeline between completion of the pilot, evaluation of the results, final regulatory approval, and implementation of full-scale MPE? Will full-scale deployment begin immediately, or should the community expect additional months of design, permitting, procurement, and construction before remediation expands to one or more wells?	There are currently no plans for any on-site treatment or discharge during the MPE pilot test, regardless of the length of time the pilot test takes place. As noted above, if MPE is determined to be an effective remedial option, implementation will follow the design and permitting and approval process referenced above.
		20. What objective performance metrics will define pilot success, and who defines success — Sunoco, PADEP, or an independent third party? If the pilot is unsuccessful, what alternative remedy will be pursued?	20. This comment was addressed at the July 8, 2025 public meeting. <i>See</i> Tr. at pgs. 44-45.
		21. The RAP refers to reaching the “practical” or “maximum extent practicable” limit of recovery. What does that mean technically? How much recoverable product is believed to remain, how was that estimate developed, and who independently verifies when active recovery can stop?	21. This comment was addressed at the July 8 th public meeting. <i>See</i> Tr. at pgs. 93-94.
		22. During MPE operations, how will Sunoco ensure private wells are not adversely affected by drawdown, turbidity, contaminant migration, or reduced yield? What monitoring and automatic stop-work criteria will be used?	22. This comment was addressed at the July 8 th public meeting. <i>See</i> Tr. at pgs. 40-42; 69-71. <i>See also</i> response to Comment No. 2 from Ms. Cook above.

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		23. When will the MPE Health and Safety Plan and Security Plan be finalized, and how will nearby residents be informed about noise, emissions, traffic, emergency procedures, and operational risks?	23. SPLP’s consultants performing the field work for the MPE pilot test will develop and implement health and safety plans for their work. A site-specific traffic control plan and security measures will also be implemented, and SPLP has worked with Upper Makefield Township to address site safety and security issues. Prior to commencing the MPE pilot test, SPLP will provide residents with additional notice regarding the upcoming work through SPLP’s incident response website, as well as by direct email communication in accordance with the PADEP-approved Public Involvement Plan.
		24. How often was active recovery conducted at each of the 44 installed monitoring/recovery wells, and were declining recovery rates due to depletion of product or limitations of the recovery methods? Will per-well recovery volumes and recovery-rate trends over time be publicly released?	24. This comment was addressed at the July 8 th public meeting. <i>See Tr. at pgs. 94-96.</i>
		4. Groundwater, Soil, Surface Water, Delineation & Long-Term Risk 25. How confident are you that contamination has been fully delineated vertically and laterally, and why?	25. This comment does not relate to the content of the RAP; however, this comment was addressed at the July 8 th public meeting. <i>See Tr. at pg. 81.</i> ¹
		27. Do you intend to install any additional monitoring wells beyond the 44 already in place?	27. ² This comment does not relate to the content of the RAP; however, this comment was addressed at the July 8 th public meeting. <i>See Tr. at pg. 83.</i>

² SPLP notes that the errata in paragraph numbering was in the original comment document.

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	26. Why haven't more wells been installed to ensure you have the perimeter of the contamination identified?	26. This comment does not relate to the content of the RAP; however, this comment was addressed at the July 8 th public meeting. <i>See</i> Tr. at pg. 83.
	28. Could additional fracture mapping change the understanding of the plume or the cleanup strategy?	28. This comment does not relate to the content of the RAP; however, this comment was addressed at the July 8 th public meeting. <i>See</i> Tr. at pg. 84.
	29. The RAP Summary states impacts are “primarily beneath the release location and to the immediate east-northeast.” What sampling and delineation work supports the conclusion that west, southwest, and cross-gradient areas — including toward Dyers Creek — are not impacted? How many wells and samples exist in each of those directions, and will maps of fracture traces, monitoring locations, and non-detect data be publicly released so that conclusion can be independently evaluated?	29. This comment does not relate to the content of the RAP; however, this comment was addressed at the July 8 th public meeting. <i>See</i> Tr. at pg. 84-85. All wells that have been installed, which are sampled on at minimum a quarterly basis, and the results of that sampling, are summarized in the quarterly Remedial Action Progress Reports, which are publicly available on SPLP's incident response website
	30. The RAP Summary states that approximately 276 tons of petroleum-impacted soil were excavated and that approximately 644 gallons of product were recovered through the excavation. What engineering analysis determined that excavation should be limited to the immediate release area beneath the pipeline? Was excavation beyond the source area, including along the east-northeast fracture-controlled migration pathway, evaluated? If so, why was it rejected? If contaminated soil or weathered bedrock remains outside the excavation footprint, where does it remain, at what concentrations, and what technical basis supports leaving it in place rather than removing it? Who made the determination to remove the soil?	30. Portions of this comment were raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pg. 85-87. Soil removal and characterization activities have been completed as documented in the ISCR and RAP. The soil sampling results that have been collected demonstrate that no additional soil remediation in the area of the release location, or in any other area, is necessary. As stated in Section 2.3 of the RAP, SPLP plans to collect attainment soil samples to demonstrate that the statewide health standards for soil have been met and will thereafter prepare an Act 2 Final Report for Soils to the PADEP for review and approval. ¹

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		- Where was the soil taken once removed from the community? - The ISCR indicates that excavation ceased after reaching the practical limit of excavation beneath the pipeline. Why was excavation not expanded beneath paved areas or along the east-northeast migration pathway toward Glenwood Drive, where numerous private wells were subsequently found to be impacted? What engineering analysis concluded that additional source removal would not provide a meaningful reduction in groundwater contamination, and where is that analysis documented?	As documented in Section 3.5.2 of the ISCR (Sept. 2, 2025), soils were excavated in the release location between February 2-11, 2025, and removed for offsite disposal.
		31. What surface water sampling has been conducted in Dyers Creek and any other nearby surface water bodies? What is the sampling frequency, what analytes are tested, what have results shown to date, and will raw data and sampling locations be made public? Has any assessment of impact to aquatic life or sediment been performed?	31. As detailed in the ISCR and prior Remedial Action Progress Reports, SPLP has implemented a Visual Assessment Plan and Surface Water Sampling and Analysis Plan, which includes performing visual, olfactory, PID assessments, and collection of samples of surface waterbodies near the release location at publicly accessible locations. There were no impacts observed to any surface water body from the release. The results of these activities have been provided to the Department and are also included in the ISCR and the Remedial Action Progress Reports, which are publicly available.
		32. The RAP concludes that no additional vapor intrusion investigation is warranted. Does PADEP agree? Will additional sub-slab samplings occur at the 19 previously tested homes, and if not, why were the existing sampling ports left in place?	32. SPLP notes that part of this comment is a question posed to the Department. As summarized in Section 2.3 of the RAP, based on the results of the vapor intrusion sampling previously completed, no further investigation or remediation of the vapor intrusion pathway is necessary. SPLP will coordinate the timing of the closure of the sampling ports with PADEP and landowners.

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		33. How has SPLP been handling the jet fuel smells that have been reported to DEP in Mt. Eyre?	33. This question was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pg. 87-88.
		34. What are the three biggest technical uncertainties that remain today, and what future findings could significantly change the remediation strategy?	34. The iterative process required to complete site characterization and remediation under Act 2 is designed to account for technical uncertainties as they arise.
		35. One year from today, what measurable improvements should residents expect to see (e.g., reductions in contaminated wells, LNAPL thickness, groundwater concentrations, or plume extent)?	35. This question was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pg. 88-89.
		36. Your incident response website states, "Based on all of our efforts to date, we continue to narrow the potential area of impact." At the same time, the Remedial Action Plan states that site characterization is not yet complete and that the full extent of contamination has not been delineated. How do you reconcile these two statements? Specifically, how can the potential area of impact be described as “narrowed” if the boundaries of the contamination plume have not yet been fully defined?	36. SPLP notes that the quoted language is from a periodic update that SPLP provided back on February 25, 2025. ¹ In any event, SPLP does not view these two statements as inherently inconsistent. As noted in the response to Comment 14 above, PADEP, the Administrative Order, and the Act 2 regulations, all expressly acknowledge the iterative process that is required to complete characterization activities. As documented in the RAP, the ISCR, and other prior submittals, SPLP has completed extensive characterization activities to delineate the potential area of impact and the ongoing investigative activities are to further supplement the data set for the area of delineated impact.
		5. Drinking Water & Public Safety 37. The RAP Summary states 203 POET systems have been installed and 1,839 samples collected from 365 private wells. How long will POET/RO systems remain in service, in perpetuity or for a defined period? If defined, what period,	37. Most of this comment was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pg. 64-65. Regarding POET installation and maintenance, SPLP has published

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	and what triggers termination? Who will pay for operation, maintenance, replacement, and monitoring, and will homeowners be allowed to use qualified contractors of their choosing? When will SPLP commit to implementing and funding an alternate permanent water solution for all Mt. Eyre residents and what long-term protections and monitoring processes will be established to ensure the continued safety of our air, water, soil and health and well-being are protected throughout the life of the pipeline?	a fact sheet regarding POETs, which is available on SPLP’s dedicated website at https://uppermakefield.incidentupdates.com/wp-content/uploads/sites/2/2025/10/POET-System-Maintenance-Fact-Sheet_October-2025.pdf In addition, SPLP has responded to the questions regarding an “alternate permanent water solution” in a letter to Upper Makefield Township dated September 11, 2025, which is available on SPLP’s dedicated website at: https://uppermakefield.incidentupdates.com/wp-content/uploads/sites/2/2026/08/09-11-25-Letter-Response-to-Upper-Makefield-Township-re_-CKS-Engineers-Proposal-for-Water-System-Alternatives-Study4017528.1.pdf
	38. What is Sunoco's policy regarding POET and reverse osmosis (RO) systems that were installed by third-party providers before or during the response to the release? Will Sunoco assume responsibility for the long-term operation, maintenance, monitoring, repair, and replacement of those systems if they are relied upon to provide safe drinking water, or does that responsibility remain with the homeowner? Will homeowners with third-party-installed systems receive the same long-term protections and support as homeowners whose systems were installed directly by Sunoco?	38. This comment does not relate to the content of the RAP; however, most of this comment was raised and discussed at the July 8th public meeting. <i>See</i> Tr. at pg. 65-66. Regarding POET installation and maintenance, and reverse osmosis systems, SPLP has published a fact sheet regarding POETs, which is available on SPLP’s dedicated website at: https://uppermakefield.incidentupdates.com/wp-content/uploads/sites/2/2025/10/POET-System-Maintenance-Fact-Sheet_October-2025.pdf
	39. Does Sunoco have a position about whether the POET/RO systems have led to decreased water volumes/pressure?	39. This comment does not relate to the content of the RAP; however, this comment was raised and discussed at the July 8th public meeting. <i>See</i> Tr. at pg. 67-68.

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	40. Will Sunoco provide emergency water supply beyond just bottled water if wells are impacted, such as “water buffalos”?	40. This comment does not relate to the content of the RAP; however, this comment was raised and discussed at the July 8 th public meeting. <i>See Tr. at pgs. 68-69.</i>
	41. What is the emergency response plan if this situation happens again, and why has it not been communicated to residents yet?	41. This comment does not relate to the content of the RAP.
	6. Technical Basis of the RAP 42. Why was guidance for crystalline intrusive bedrock used when the local geology is the Lockatong Formation? What site-specific testing supports assumptions about back-diffusion, rebound, and rock storage?	42. This comment was raised and discussed at the July 8 th public meeting. <i>See Tr. at pgs. 76-78.</i> SPLP also notes that the substance of this comment is addressed in Section 2.2 of the RAP and Section 2.5 of the ISCR.
	43. Table 4-1 retains “Carbon Injection” as a groundwater remedial technology, and Section 5.1.4 describes activated carbon injections, but the main remedy discussion selects MPE pilot testing. Is carbon injection actually planned, only a contingency, or merely a retained alternative?	43. This comment was raised and discussed at the July 8 th public meeting. <i>See Tr. at pgs. 74-75.</i>
	44. What measurable criteria and contingency triggers would require renewed active remediation?	44. SPLP notes that active remediation is currently ongoing, and remediation activities will continue until attainment of the Act 2 cleanup standards have been demonstrated.
	45. Several technical inconsistencies and omissions have been identified in the RAP (chemical names, monitoring well summaries, lead results, point of compliance definition, figures, and pilot-test details). Will Sunoco issue a revised RAP addressing these comments before final remedy selection?	45. SPLP notes that this comment does not specify any alleged technical inconsistencies or omissions in the RAP. SPLP also notes that, in accordance with the Department-approved Public Involvement Plan, it is submitting this response to all of the public comments that SPLP received on the RAP and expects that PADEP will issue its own

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			comments on the RAP. To the extent PADEP requests revisions to the RAP, SPLP will make such revisions.
		7. Property Impacts	
		46. What are Sunoco’s long-term plans for 108 Spencer Road?	46. This comment does not relate to the content of the RAP; however, this comment was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pg. 71.
		47. Has Sunoco offered property value guarantees or buyout protections to some homeowners? If so, what are the terms, and will Sunoco make the standard form of that agreement public? Will comparable protections be available to all similarly affected residents?	47. This comment does not relate to the content of the RAP; however, this comment was raised and discussed at the July 8 th public meeting. <i>See</i> Tr. at pg. 71-72.
		48. Will Sunoco compensate homeowners for long-term property value impacts and fund independent appraisals where appropriate?	48. This comment does not relate to the content of the RAP.
		49. What are Sunoco plans to repair/replace the curbs that have been damaged by trucks & equipment? What are plans for road repairs and repaving when substantially complete clean up efforts?	49. This comment does not relate to the content of the RAP; however, SPLP is coordinating future road and curb restoration activities with Upper Makefield Township.
5.	Matthew Lebo	My comment is that I don't believe an entire plan can be approved before a pilot study is done. My reading of the proposal makes the pilot study more of a formality than a study. This seems a little aggressive in that the decision to select the pilot method was based on a qualitative scoring.	SPLP acknowledges this comment and notes that no response is necessary.

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		Further, there is no plan in what happens to if it doesn't work. I don't see what the point of a pilot would be if the decision is already being presented. I think the pilot must happen before a full plan can be approved.	
6.	Upper Makefield Township	Upper Makefield Township has reviewed the June 19, 2026, Remedial Action Plan (“RAP”) for the Sunoco Pipeline LP (“SPLP”) Twin Oaks—Newark Pipeline Release, prepared by Verdantas LLC, along with the associated RAP Summary. The Township offers the following comments on those documents: 1. Pipeline products and release characterization. The RAP and Summary identify Jet-A fuel as the product released from the pipeline. However, SPLP's website indicates that the pipeline also transports two grades of gasoline (87 and 93 octane) and diesel fuel. The RAP and Summary should be revised to provide a complete description of the products transported by the pipeline and the technical rationale for SPLP's conclusion that the release was limited to Jet-A fuel.	1. A similar comment regarding the product transported in the pipeline when the release was discovered was raised and addressed at the July 8th public meeting. <i>See</i> Tr. at pgs. 60-62. SPLP also notes that Upper Makefield Township raised similar comments in public comments to the ISCR, and also to the January 5th Response Letter, to which SPLP responded. <i>See</i> SPLP Response to Upper Makefield Township Comment No. 2 on ISCR and SPLP Response to Upper Makefield Township Comments on January 5th Letter.
		2. Release volume and leak duration. The RAP states that the release was discovered on January 31, 2025. The initial volume estimate of 6,500 gallons was reported at the time of the release and has been carried forward from that date with no adjustment. According to SPLP's website, the affected pipe section was removed and sent to an independent metallurgical	2. SPLP respectfully disagrees with this comment in that it requests information and revisions to the RAP that are not relevant to demonstrating attainment of the applicable Act 2 remedial cleanup standards. SPLP also refers to its responses to Mr. Berger’s Comment No. 1 and Task Force Comment No. 12 above regarding the volume estimate and confidentiality of its submittals to PHMSA

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	laboratory for analysis. In the January 28, 2026, Federal Register, the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) reported that the analysis identified a 2.5-inch axial crack caused by neutral stress corrosion cracking from water intrusion between the pipeline and the Type A sleeve. Because the analysis was not available when the release was discovered, the continued validity of the initial release-volume estimate remains unsupported. The RAP should be revised to provide the estimated leak duration and an updated release volume based on the metallurgical analysis, pipeline monitoring data, including pressure and flow data, and product accounting.	
	3. Private well use and cleanup alternatives. The RAP acknowledges that routine operation of neighborhood potable water supply wells contributes to water-table fluctuations and a downward vertical gradient. The Summary states that SPLP evaluated 16 cleanup methods for fractured-bedrock conditions and determined that 10 are poorly suited to a neighborhood served by private wells.	3. As noted in Section 4.0 of the RAP (<i>see</i> pg. 15) and Table 4-1, SPLP used four different considerations in its initial screening of potential remediation methods, only one of which was complexities with groundwater usage (e.g., potential adverse effects on water supply quality or quantity). Moreover, no potential remediation methods failed that screening process solely on the basis of complexities with local groundwater usage, as reflected in Table 4-1.
	4. Resident preferences and water-supply feasibility. The Township retained Probolsky Research to conduct an independent Water Service Residential Study. Survey results posted on the Township's website show that most Mt. Eyre neighborhood residents favor a permanent public water system to replace existing potable wells as the neighborhood's long-term water supply. The results also indicate that most residents are	4. This comment does not relate to the content of the RAP; however, SPLP again notes that it previously responded to questions from the Township regarding a permanent public water system in its letter to the Township dated September 11, 2025, which is available at: https://uppermakefield.incidentupdates.com/wp-content/uploads/sites/2/2026/08/09-11-25-Letter-Response-to-Upper-Makefield-Township-re_-CKS-

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	not confident POET systems will provide safe drinking water over the long term. The Township's consulting engineer also completed a study concluding that transitioning from on-lot wells to a public water supply is feasible.	Engineers-Proposal-for-Water-System-Alternatives-Study4017528.1.pdf
	5. Comparative evaluation. Because SPLP has stated that neighborhood potable-well pumping screened out 60 percent of the remedial technologies considered in the RAP, the Township believes the RAP should evaluate a remedial conceptual site model that includes a public water supply. This revision would allow a more complete comparison of remedial technologies, support an optimized cleanup, minimize the time needed to achieve the attainment standard, and better protect Township residents' right to a reliable and sustainable water source. Omission of a public water source as an option to facilitate remediation is a significant deficiency in the RAP. The Township finds it unacceptable to ignore the option of a public water system that would allow for other methods to be used for remediation. A public water system would expand the remediation methods available to SPLP. We deem this critical due to the low amount of product recovered to date by SPLP.	5. See Response to Upper Makefield Township Comment No. 3 above, which is incorporated by reference. In response to the portions of this comment relating to a potential public water supply, SPLP notes that its NIR indicated that it will be pursuing statewide health standards under Act 2. The installation of a public water supply for the Mt. Eyre Manor neighborhood would constitute pathway elimination, which would allow contamination to remain in groundwater at higher concentrations than the statewide health standards, nor is a public water connection required for demonstrating attainment of the statewide health standards.
	6. Pilot testing. Despite the preceding comments, the Township understands that SPLP intends to conduct pilot testing of multiphase extraction for LNAPL and groundwater. The Township did not receive the final Pilot Test Work Plan until the afternoon of Sunday, August 16,	6. This comment does not relate to the content of the RAP, but rather, appears to refer to SPLP's submission to the Township to obtain a Road Occupancy Permit for the MPE pilot test.

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	2026. Township staff, technical consultants, and counsel must review the Work Plan for consistency with Township ordinances and other requirements before the Township can issue any required permits or approvals. SPLP should be advised that its anticipated pilot-test implementation schedule may be affected by the delayed submission of the Work Plan. SPLP has had over a year and a half to explore options for remediation and the continued delays indicate an unwillingness or inability to conduct an appropriate cleanup. SPLP has been advised of the schedule of the Board of Supervisor meetings and has put themselves in a position where approvals may not be able to be obtained until September or later.	SPLP disagrees with the premise of this comment that suggests SPLP is not completing site characterization and remediation efforts in an expeditious manner. As SPLP has stated previously in response to prior public comments, site characterization and remediation to evaluate and address the impacts of a release is an iterative process that requires sufficient time to complete. 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 accelerated remedial deadlines established by the Order.
	The Township expresses extreme concern that current interim remediation efforts are yielding minimal results and the delay in implementing new technologies is potentially allowing the contamination to spread. Furthermore, the residents do not appear to have faith in the ability of SPLP to appropriately remediate the release from their pipeline. A solution that needs to be explored, for both improved remediation efforts and water quality issues, is a public water supply. The Township appreciates the opportunity to review the RAP and anticipates ongoing discussions with SPLP relative to ongoing site characterization and remedial activities resulting from the pipeline release.	This comment does not relate to the content of the RAP; however, SPLP acknowledges this comment and again notes that site characterization and remediation to evaluate and address the impacts of a release is an iterative process that requires sufficient time to complete. 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 accelerated remedial deadlines established by the Order, and is currently waiting for the Township to approve its Road Occupancy Permit Application so that it can implement the proposed MPE pilot test. The portions of this comment regarding public water supply were addressed in response to Comment Nos. 4 and 5 above.

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7.	Mark Darling	The following comments represent my own and may or may not necessarily reflect the opinion of the residents of Mt Eyre Manor. These comments address the June 19, 2026 Remedial Action Plan (“RAP”) prepared by Verdantas LLC on behalf of Sunoco Pipeline LP (“SPLP”) concerning the release of Jet-A fuel from the Twin Oaks–Newark pipeline in the Mt. Eyre Manor neighborhood of Upper Makefield Township. The residents recognize the substantial investigation and interim remediation activities undertaken to date and do not oppose appropriate pilot testing of multiphase extraction (“MPE”). However, the RAP does not yet provide an adequate technical or administrative basis for PADEP to approve MPE as the final remedial approach for the site. The principal concern is that SPLP has selected MPE as its preferred remedial technology while acknowledging that characterization of the site remains incomplete. Because this release occurred in a complex fractured-bedrock aquifer that supplies private residential drinking-water wells, the final remedy should not be selected until the extent of contamination has been adequately delineated and the proposed technology has demonstrated, through objective and independently reviewable performance criteria, that it can achieve the required cleanup standards while protecting the neighborhood’s water supplies. We therefore respectfully request that PADEP approve, at most, an appropriately conditioned MPE pilot test at this time and reserve approval of the final remedial approach until the issues identified below have been satisfactorily addressed.	SPLP notes that the RAP specifically states that MPE pilot testing is “proposed to determine the effectiveness and technical feasibility of MPE at the site.” The results of that pilot testing will guide SPLP’s proposed remedial approach for the site. As noted in footnote 1 above, SPLP is performing its remedial activities pursuant to Act 2, but the Order required SPLP to submit certain reports that are not required under Act 2 (i.e., an ISCR and a RAP). The Order also required SPLP to submit the RAP while site characterization activities remain ongoing (i.e., within 60 days after approval of its Interim Site Characterization Report). That sequencing is inconsistent with PADEP’s well-established remedial sequence for sites where a RAP is required and SPLP again notes that many comments received (including this one) result from, or are influenced by, the fact that the Order required SPLP to submit the RAP before site characterization was complete.
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	1. Final Remedy Selection Should Await Completion of Site Characterization The RAP expressly acknowledges that site characterization remains ongoing and that the site has not yet been fully characterized. It further states that additional investigation is being conducted to refine the extent of LNAPL and complete vertical delineation of groundwater impacts. At the same time, SPLP has concluded that MPE is the most favorable remedial alternative. These positions are difficult to reconcile. A final remedy cannot reasonably be evaluated until the nature, extent, migration pathways, vertical distribution, and fracture-controlled movement of the contamination are adequately understood. PADEP should therefore: • limit any present approval to pilot testing of MPE; • require completion of the remaining horizontal and vertical delineation activities; • require incorporation of new characterization results into an updated conceptual site model; and • require SPLP to submit a revised or supplemental remedial evaluation following completion of the pilot test and remaining site characterization. Approval of a pilot test should not constitute approval of MPE as the final remedy.	1. SPLP disagrees with the assertion that these positions are “difficult to reconcile.” As noted in response to Task Force Comment No. 36 above, SPLP has completed extensive characterization activities to delineate the potential area of impact and the ongoing investigative activities are to further supplement the data set for the area of delineated impact. The MPE pilot testing will evaluate whether MPE is an effective remedial approach for the site, which would thereafter be designed and would ultimately be deployed once that characterization is complete. The remainder of this comment is directed at PADEP and does not require a response from SPLP.¹
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	2. Objective MPE Pilot-Test Success and Failure Criteria Must Be Established in Advance The RAP describes the proposed pilot-test equipment and operating conditions in considerable detail. SPLP anticipates a four- to five-week test, approximately five to seven days of operation per well to establish pseudo-steady-state dewatering, and a pilot-test goal of maintaining an operating casing vacuum of at least 10 inches of mercury. These are useful operating parameters, but they do not define whether the pilot test has actually demonstrated that MPE can remediate the site. Before pilot testing begins, PADEP should require written, quantitative criteria addressing at least: • the required radius of hydraulic influence; • the required radius of pneumatic/vacuum influence; • minimum LNAPL recovery rates; • minimum petroleum/VOC mass-removal rates; • the degree of smear-zone dewatering required; • groundwater-quality improvement; • acceptable contaminant rebound following shutdown; • evidence that contaminated fractures have actually been influenced by the system; • evidence that contamination is being captured rather than redistributed; and • specific criteria for determining whether MPE is successful, requires modification, must be supplemented by another technology, or should be rejected.	2. This comment is directed at PADEP, but SPLP notes that it would be inappropriate to establish “predetermined criteria” for determining whether MPE pilot testing demonstrates that MPE is an effective remedial approach for the site. More specifically, the purpose of pilot testing is to collect data to evaluate whether MPE is an effective remedial approach.
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		Without predetermined criteria, the meaning of a “successful” pilot test could be determined after the test has already been conducted.	
		3. MPE Performance Must Be Demonstrated in the Actual Fractured-Bedrock System Groundwater movement at this site is controlled principally by fractures rather than uniform flow through porous soil. SPLP has relied in part upon ITRC guidance for fractured rock and has treated the Lockatong Formation as hydraulically similar to low-storage, fracture-dominated crystalline rock for purposes of remedy screening. The ITRC information reproduced in the RAP also cautions that the reliability of MPE capture depends upon the complexity of the fracture network. Accordingly, demonstrating substantial vacuum or groundwater drawdown in an extraction well should not by itself establish that MPE is effective. The pilot must demonstrate that the system is influencing the fractures known or reasonably believed to contain LNAPL and dissolved contamination. PADEP should require SPLP to prepare hydraulic and pneumatic influence maps based upon pilot data and compare those results with the known fracture network, historical LNAPL locations, groundwater contamination and geophysical investigations.	3. This comment is directed at PADEP, but SPLP notes that it will evaluate the totality of the data collected to determine whether the proposed pilot testing has demonstrated that MPE is an effective remedial approach for the site.

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	Areas where sufficient capture cannot be demonstrated should be specifically identified and evaluated for supplemental remediation.	
	4. Private Residential Wells Must Be Protected During MPE Operations SPLP proposes groundwater extraction intended to produce approximately 30 to 40 feet of drawdown in individual extraction wells. This activity will occur in a neighborhood dependent upon private groundwater wells. Although the RAP states that nearby potable water wells will be monitored during the pilot test, the plan should contain much more specific residential-well protection requirements. Prior to pilot testing, SPLP should be required to establish: • baseline groundwater elevations and well-production information for potentially affected residences; • baseline untreated-water analytical results; • monitoring frequency during MPE operation; • specific drawdown thresholds requiring reduction or suspension of pumping; • water-quality thresholds requiring immediate action; • procedures for responding to loss of well yield or interruption of water supply; • immediate provision of an alternative potable-water supply where necessary; and	4. This comment appears to be directed at PADEP, but SPLP refers to its response to Comment No. 2 from Ms. Cook above and to its response to Task Force Comment Nos. 15 and 22 above.

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		SPLP responsibility for repair, deepening, replacement or other restoration of residential wells adversely affected by remedial operations. Residents should not bear the risk or cost of impacts created by implementation of SPLP’s remediation system.	
		5. Long-Term POET System Responsibility Must Be Explicitly Defined As of June 2026, SPLP had installed or reimbursed property owners for approximately 203 Point-of-Entry Treatment (“POET”) systems. The RAP summary identifies continued provision of safe drinking water as one of the cleanup objectives. The RAP should provide a clear, enforceable commitment regarding long-term POET responsibility. SPLP should remain responsible for all reasonable costs associated with release-related POET systems, including: - routine inspection; - sampling; - carbon or other media replacement; - repair; - maintenance; - component replacement; - complete system replacement where necessary; and - appropriate treatment of newly affected potable wells.	5. This comment appears to be directed at PADEP, but SPLP refers to its response to Task Force Comment Nos. 37 and 38 above.

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		No POET system should be discontinued solely because treated water meets applicable standards. Termination of a POET system should require PADEP approval and a defined period of satisfactory sampling of untreated/raw well water under representative seasonal groundwater conditions. PADEP should also require provisions ensuring that these obligations survive future changes in property ownership and remain funded for as long as the systems are required.	
		6. “Maximum Extent Practicable” Must Be Defined Objectively The RAP’s attainment objectives include recovering LNAPL to the “maximum extent practicable,” both inside and outside the point of compliance. Because this phrase may eventually be used to justify termination of active recovery, its meaning should be defined now. SPLP should be required to establish objective criteria for determining when maximum practicable recovery has been achieved. Declining recovery rates alone should not establish that further remediation is impracticable where measurable LNAPL remains capable of acting as a continuing source of dissolved groundwater contamination. Any future determination that maximum practicable recovery has been reached should require PADEP review and approval based upon documented technical evidence.	6. This comment appears to be directed at PADEP, but SPLP refers to its response to Task Force Comment No. 21 above and also notes that an eventual determination that maximum practicable recovery has been reached will be documented in one or more final reports that it will submit for PADEP’s review and approval.

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		7. Rebound Testing Must Be Required Before Remediation Is Considered Complete MPE lowers groundwater elevations and exposes portions of the LNAPL smear zone to vacuum extraction. Following shutdown, groundwater levels will recover. The possibility that LNAPL or elevated VOC concentrations could reappear after groundwater rebound is therefore important. PADEP should require a formal rebound-testing program following temporary and permanent shutdown of MPE operations. The program should evaluate: • groundwater elevations; • LNAPL occurrence and thickness; • dissolved VOC concentrations; • contaminant mass flux; and • conditions during multiple seasonal groundwater regimes. A temporary reduction in contamination while the extraction system is operating should not be considered equivalent to permanent attainment.	7. This comment appears to be directed at PADEP, but SPLP notes that demonstrating attainment of Act 2 remediation standards will require multiple quarters of groundwater sampling to confirm that remedial activities have successfully met those standards.
		8. The Comparative Alternatives Analysis Requires Greater Technical Support SPLP initially considered numerous remediation technologies and retained MPE, continued LNAPL recovery,	8. This comment appears to be directed at PADEP, but SPLP notes that it used evaluative factors taken directly

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	natural source-zone depletion, carbon injection and monitored natural attenuation for additional evaluation. The RAP ultimately selected MPE using a relative scoring system that emphasized three differentiating factors: time to achieve the standard, implementability, and incremental health and economic benefit. Table 5-1 applies scores of three points for the most favorable alternative, two points for moderately favorable, and one point for least favorable. PADEP should require greater documentation supporting these rankings. For each alternative, SPLP should provide the factual and technical basis for its conclusions concerning: • anticipated cleanup duration; • anticipated mass removal; • long-term reliability; • effect on contaminant mobility; • potential adverse effects; • costs; • post-remediation monitoring; • residual contamination; • likelihood of reaching Statewide health standards; and • uncertainty associated with fractured-bedrock conditions.	from PADEP’s Act 2 statute (<i>See</i> 35 P.S. § 6026.304(j)) and then applied a scoring method for those factors to create a relative ranking consistent with industry best practices. SPLP also notes that the items in the bullet list do not track those evaluative factors and that some of the technical information sought by this question for MPE will be generated by that pilot test. As noted above, the purpose of the proposed MPE pilot testing is to generate data to evaluate whether MPE is an effective remedial approach for the site, and that data will also allow for an evaluation of whether a combination of remedial technologies would be an appropriate remedial approach.
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	The analysis should also evaluate combinations of technologies rather than treating the alternatives principally as stand-alone remedies.	
	9. A Formal Contingency and Adaptive-Management Plan Is Needed The RAP itself recognizes that more than one remedial technology may ultimately be needed. PADEP should require SPLP to establish specific decision points and contingency measures in advance. For example, supplemental remedies should be evaluated if MPE fails to achieve required: • capture zones; • LNAPL mass removal; • dissolved-phase concentration reductions; • groundwater plume control; or • progress toward Statewide health standards. Potential supplemental approaches already identified in the RAP include continued LNAPL recovery, carbon injection and monitored natural attenuation. Additional technologies should not be excluded if future characterization demonstrates that they are appropriate. The remedial program should therefore be adaptive rather than dependent upon continued operation of MPE regardless of its actual performance.	9. This comment appears to be directed at PADEP, but as SPLP noted above, the RAP specifically states that MPE pilot testing is “proposed to determine the effectiveness and technical feasibility of MPE at the site,” and the results of that pilot testing will guide SPLP’s proposed remedial approach for the site. SPLP also again notes that the iterative process required to complete site characterization and remediation under Act 2 is designed to allow for supplemental remedial activities should they be warranted.

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		10. The Implementation Schedule Is Insufficiently Specific Section 6.4 states that pilot testing is planned for the summer or fall when seasonal groundwater levels are lower. It provides no firm dates or enforceable time limits for subsequent remedial activities. PADEP should require a detailed schedule establishing dates or maximum time intervals for: • pilot-test commencement; • pilot-test completion; • submission of the pilot-test report; • PADEP review; • public availability of pilot-test results; • final remedy determination; • engineering design; • permitting; • construction; • system startup; • periodic performance evaluations; • remedy optimization; and • contingency-action decisions. The community should not be left with an open-ended remedial program lacking measurable milestones.	10. This comment appears to be directed at PADEP, but SPLP refers to its response to Task Force Comment No. 19 above regarding the MPE pilot test schedule and documentation. SPLP also notes that it will continue to perform remediation activities until applicable cleanup standards have been attained, in full compliance with the Act 2 regulations and the Order and will continue to keep the public informed of its remedial progress in accordance with the PADEP-approved Public Involvement Plan.
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	11. Necessary Permits and Approvals Should Be Identified Before Full-Scale Approval The RAP states that SPLP is still evaluating which permits and approvals may be necessary to conduct pilot testing. Before approving a full-scale system, PADEP should require identification of all potentially applicable requirements relating to: • air emissions; • recovered groundwater; • waste handling and disposal; • petroleum recovery; • noise; • generators; • traffic; • temporary structures; • stormwater; • electrical installations; and • other Township, County, Commonwealth or federal requirements. Approval of the final remedy should occur only after the regulatory requirements for implementation are sufficiently defined.	11. This comment appears to be directed at PADEP, but SPLP notes that it will comply with all legal requirements applicable to its activities at the site, including any associated with the list of items provided in this comment.
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	12. Residential Quality-of-Life Impacts Must Be Addressed The proposed pilot system may include blowers, pneumatic pumps, above-ground hoses and piping, storage tanks and a commercial diesel-powered generator. These activities are proposed within an established residential neighborhood. PADEP should require a neighborhood impact-management plan addressing: • allowable hours of construction and operation; • nighttime operations; • noise limits; • vibration; • generator exhaust; • odors; • VOC emissions; • lighting; • equipment placement; • truck traffic; • road closures; • emergency access; • site security; • spill prevention; • property restoration; and • advance notice to affected residents.	12. This comment appears to be directed at PADEP, but SPLP again notes that the Road Occupancy Permit Application Package that it submitted for the MPE pilot test contains much of the information sought by this comment. <i>See, e.g.,</i> Traffic Control Plan, Sound Management Plan, and Air Monitoring and Sampling Plan for Multiphase Extraction (MPE) Pilot Test available at: https://uppermakefield.incidentupdates.com/wp-content/uploads/sites/2/2026/08/MPE-Pilot-Test-UMT-Road-Occupancy-Permit-Application-Package_08.16.2026.pdf
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	Remediation must not unnecessarily impose additional environmental or quality-of-life burdens on a community already affected by the pipeline release.	
	13. Vapor and Ambient-Air Monitoring Should Continue During MPE The RAP concludes, based upon previous indoor-air and soil-gas investigations, that further vapor-intrusion remediation is not presently warranted. MPE, however, intentionally applies vacuum to petroleum-impacted subsurface formations and promotes volatilization of hydrocarbons. The pilot system therefore includes vapor-phase granular activated carbon treatment. PADEP should require appropriate air monitoring during both the pilot and full-scale remedy, including: • equipment exhaust monitoring; • perimeter ambient-air monitoring; • VOC screening; • GAC breakthrough monitoring; • predetermined corrective-action thresholds; and • targeted indoor-air monitoring at nearby residences when warranted by operating conditions or monitoring results. Operating thresholds should be established that require corrective action or temporary shutdown if unacceptable emissions occur.	13. This comment appears to be directed at PADEP, but SPLP again notes that its Road Occupancy Permit Application Package contains an air monitoring plan that will be implemented during the MPE pilot test.

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	14. Pilot-Test Data and Modeling Should Be Publicly Available Before Full-Scale Approval The RAP calls for collection of extensive data concerning groundwater drawdown, vacuum distribution, groundwater chemistry, vapor concentrations and mass removal. Residents and their technical representatives should have an opportunity to review this information before the full-scale remedy is approved. PADEP should require SPLP to publicly provide: • laboratory analytical reports; • field monitoring data; • groundwater extraction volumes; • recovered LNAPL quantities; • vapor concentrations; • mass-removal calculations; • vacuum measurements; • groundwater drawdown results; • maps showing hydraulic and pneumatic radii of influence; • rebound-test results; • operating interruptions and equipment failures; and • SPLP’s technical interpretation of the results. PADEP should provide a meaningful opportunity for technical and public review before determining that the pilot supports full-scale MPE.	14. This comment appears to be directed at PADEP, but SPLP again notes to its responses to the prefatory statements and Comment Nos. 1 and 2 from this commenter above regarding the purpose of the pilot testing and the final remedial approach, and SPLP also notes that it will continue to keep the public informed of its remedial progress in accordance with the PADEP-approved Public Involvement Plan.
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		15. Independent Technical Review Should Be Considered Verdantas prepared the RAP on behalf of SPLP. Given the complexity of the fractured-bedrock hydrogeology, dependence of the neighborhood upon private groundwater supplies, and long-term consequences of the selected remedy, independent review would increase confidence in the remedy-selection process. PADEP should consider requiring or facilitating independent technical review of: • the completed conceptual site model; • the MPE pilot-test design; • pilot-test results; • radius-of-influence calculations; • contaminant mass-removal estimates; • rebound results; and • the final remedial design. Such review should occur before the pilot results are used to justify construction of a long-term full-scale system.	15. This comment appears to be directed at PADEP, but SPLP notes that the Township and its consultants are already conducting independent reviews and have been commenting on SPLP’s technical submittals to PADEP.
		16. Long-Term Financial Assurance Should Be Established The environmental consequences of this release may continue for years and potentially longer. The RAP presently focuses principally upon achieving Statewide health standards. The neighborhood also needs confidence that adequate financial resources will remain	16. This comment appears to be directed at PADEP, but SPLP again notes that its NIR indicated that it will be pursuing statewide health standards under Act 2 and does not plan to use engineering and institutional controls to demonstrate attainment of those standards such that no

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		available for residential protection throughout the remediation period. PADEP should require an appropriate financial-assurance mechanism sufficient to cover foreseeable long-term obligations, including: • POET operation and replacement; • drinking-water monitoring; • environmental monitoring; • MPE or other remedial-system operation and maintenance; • system replacement; • contingency remediation; • private-well impacts; • post-remediation monitoring; and • emergency response. The mechanism should remain in place until PADEP determines that contamination no longer presents a potential threat to neighborhood water supplies and all required post-remediation obligations have been satisfied.	post remediation care activities will be needed under Act 2.
		17. Continued Monitoring Should Extend Beyond the Presently Identified Contaminated Area The fractured nature of the aquifer and the historical migration of contamination warrant conservative monitoring of properties outside the currently identified core impact area. PADEP should require continued sentinel monitoring along plausible groundwater and fracture-controlled migration pathways.	17. This comment is directed at PADEP and does not relate to the content of the RAP.

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	Monitoring locations and frequency should be reevaluated as new characterization and pilot-test information becomes available. A finding that a well has historically been clean should not automatically eliminate that well from future monitoring where hydrogeologic conditions indicate continuing potential exposure.	
	18. Remedy Completion Must Mean More Than Meeting Standards at Selected Monitoring Wells The ultimate objective should be durable protection of the aquifer and residential drinking-water supplies. PADEP should therefore require that attainment decisions consider: • spatial coverage of the monitoring network; • vertical coverage; • seasonal groundwater variation; • untreated potable-well results; • LNAPL rebound; • long-term dissolved-phase trends; and • evidence that residual source material is no longer capable of causing renewed exceedances. No final attainment determination should be based solely upon temporary compliance at a limited number of monitoring locations.	18. This comment is directed at PADEP and does not relate to the content of the RAP.

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	Conclusion The neighborhood supports prompt and effective cleanup of the Jet-A release and recognizes that MPE may ultimately prove to be an important component of that cleanup. However, SPLP’s own two-page summary states that MPE has been identified as the preferred method, that approximately one month of pilot testing will be used to confirm its effectiveness, and that a full-scale system would then be designed and operated if the pilot is successful. The full RAP demonstrates that substantially more technical uncertainty remains. For that reason, we respectfully request that PADEP: 1. approve only the MPE pilot test at this stage, subject to appropriate conditions; 2. require completion of site characterization before approving a final remedy; 3. establish quantitative pilot-test success and failure criteria before testing begins; 4. require enforceable safeguards for residential wells and POET systems; 5. require rebound testing and long-term monitoring; 6. require an adaptive contingency plan if MPE does not perform as anticipated; 7. establish enforceable implementation milestones; 8. provide public access to pilot-test data and an opportunity for review; 9. consider independent technical review before final remedy approval; and	SPLP again notes its responses to the prefatory statements and Comment Nos. 1 and 2 above regarding the purpose of the pilot testing and the final remedial approach; notes that this comment is a restatement and conclusions drawn from Mr. Darling’s Comment Nos. 1, 2, 4, 7, 9, 10, 14, 15, 16; is directed at PADEP; and, does not relate to the content of the RAP.¹
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		10. establish sufficient long-term financial assurance to protect residents throughout the remediation and post-remediation period. The guiding principle should be straightforward: Pilot testing may demonstrate that MPE is an appropriate remedy. It should not be assumed in advance that MPE is the final remedy. SPLP should be required to demonstrate, with objective site-specific evidence, that the selected remedy will capture and remediate the contamination within this complex fractured-bedrock system, achieve applicable Pennsylvania cleanup standards, prevent further contaminant migration, and protect the neighborhood’s private drinking-water supplies for the long term.	
8.	Joseph and Monique Chiolo	To Whom It May Concern: Vis-à-vis the diminished value of our homes and the infuriating suggestion that residents pay a monthly charge for municipal water, the remedial action plan is of somewhat lesser importance. Please explain how the issues regarding property values and water charges are being addressed and will ultimately be resolved. My wife and I are empty nesters who are ready to downsize, but we cannot afford to do so given the dramatic decline in home values resulting from the pipeline leak.	This comment does not relate to the content of the RAP.

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9.	Richard Matusz (response to “Task Force” Email Comment Submission)	The only thing that I would suggest adding to our responses is: When was the last time that SPLP ran the "state of the art" leak detection equipment through the pipeline and how frequently will SPLP run this equipment going forward? If I recall from one of the early in person meetings, the SPLP representatives indicated that they run this equipment every few years. Given the age of the pipeline and the recent jet fuel leak, I would suggest that this equipment be run on a more frequent basis, i.e. monthly and that PADEP require this and monitor that it is being done, in order to obtain PADEP approval of the RAP.	This comment does not relate to the content of the RAP.
10.	State Senator Seven J. Santarsiero and Rep. Perry S. Warren, Jr.	We are writing to express ongoing and significant concerns related to the remediation of the jet fuel spill in the Mt. Eyre neighborhood of Upper Makefield Township. More than eighteen months have passed since Sunoco acknowledged the leak in January/February 2025 and nearly two years after residents began reporting strong jet fuel odors. Sunoco's remediation response has been unacceptable. After over a year of passive remediation, Sunoco is only now proposing pilot testing for its preferred active extraction method, Multiphase Extraction. Township officials and residents have repeatedly urged more aggressive remediation from the outset, yet efforts have been limited to passive mechanisms such as bailing and absorbent socks. The prolonged delay in implementing active remediation likely allowed the fuel to migrate deeper into the subsurface, beyond the reach of passive methods. Had more effective recovery	This comment does not relate to the content of the RAP; however, as SPLP noted in response to various comments above, it has conducted its characterization in accordance with the requirements of Act 2 and the Order and has met the accelerated remedial deadlines established by the Order. SPLP also disagrees with the assertions in this comment that only “passive remediation” has been conducted by SPLP and “[h]ad more effective recovery methods been deployed earlier, it is reasonable to assume that a majority of the pollution would have been

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	methods been deployed earlier, it is reasonable to assume that a majority of the pollution would have been removed. To date only 518 gallons have been recovered from wells, which is less than 10 percent of Sunoco's own estimated release volume. There also remains unsatisfactory information regarding the true total quantity of jet fuel released, and the methodology used to calculate the estimate. Despite repeated requests, Sunoco has not provided an updated volume estimate or explained how the 6,500-gallon figure was determined. This estimate appears to have been generated hastily in the hours immediately after the leak's acknowledgement, without the benefit of subsequent investigative findings. Given nearly two years of resident reports of fuel odors prior to that acknowledgment, it is difficult to accept that the original estimate remains accurate. Compounding this uncertainty is the lack of transparency regarding the root cause analysis. The Pipeline and Hazardous Materials Safety Administration (PHMSA) issued an advisory in January 2026 noting that improperly-installed or managed Type-A sleeves may be vulnerable to corrosion and other integrity issues. Yet Sunoco has not released its root cause findings. Considering that none of Sunoco's monitoring tools detected the leak, even during active inspection, public confidence cannot be restored until a thorough and transparent root-cause analysis is completed and shared publicly. Regarding Multiphase Extraction, while active recovery should have begun at the start of this process, it is essential to ensure that the method will not introduce new risks to residents. We have yet to have the opportunity to review the	removed.” SPLP notes that it initiated active remediation including soil removal and LNAPL recovery through multiple mechanisms immediately after identifying the release and those active LNAPL recovery efforts remain ongoing. This comment does not relate to the content of the RAP; however, SPLP refers to its responses to Mr. Berger’s Comment No. 1 and Task Force Comment No. 12 above regarding the volume estimate and confidentiality of its submittals to PHMSA. This comment does not relate to the content of the RAP; however, SPLP again notes that the purpose of pilot testing is to collect data to evaluate whether MPE is an effective remedial approach for the site, that an MPE
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	detailed plans for Multiphase Extraction even though the Township has requested this. We need clear, scientific evidence demonstrating that dewatering the smear zone will not compromise groundwater or negatively affect residential water supply. Additional clarification is needed to ensure that this approach will not create cones of depression that could redirect contaminants into private wells. Furthermore, we must understand whether this extraction method is scientifically supported to yield meaningful product recovery. The prolonged disruption created as a result of this release has severely impacted the quality of life for Mt. Eyre residents. They are exhausted by the chaos in their neighborhood, the fear for their health, the anxiety surrounding long-term exposure, and the uncertainty of their home values. For 18 months, they have been living under conditions no community should endure. They should not have to continue fighting for Sunoco and Energy Transfer to take responsibility for the damage caused. We continue to hear from residents that dirt and sediment are in their water, and filters require changing at frequent intervals. This is not a sustainable permanent water solution. We support the Township's pursuit of alternative water solutions and Sunoco and Energy Transfer must be held accountable to provide long-term water solutions for this community. We respectfully request the following additional confirmations: 1. Sunoco and Energy Transfer must commit to ongoing servicing of all POET systems. This includes routine	system would thereafter be designed, and that the MPE system design would consider the concerns expressed in this comment. This comment does not relate to the content of the RAP; however, as SPLP noted above, it has conducted its remedial activities in accordance with the requirements of Act 2 and the Order and has met the accelerated remedial deadlines established by the Order.¹ This comment does not relate to the content of the RAP; however, SPLP refers to its response to Task Force Comment No. 37 and to Township Comment Nos. 4 and 5, above. 1. This comment does not relate to the content of the RAP; however, SPLP refers to its responses to Task Force Comment Nos. 37 and 38 above.
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		contaminant testing, filter performance assessment, and timely filter replacement until remediation is fully complete. 2. POET systems are not a sustainable long-term solution. A permanent clean water source must be identified and provided to residents, yet the Remedial Action Plan contains no reference to such a solution. 3. The Department of Environmental Protection must independently review all vapor intrusion, soil, and surface water testing to verify Sunoco and Energy Transfer's claims that no additional testing is needed. 4. Sunoco and Energy Transfer must act with urgency and diligence to continue remediation and restore the neighborhood. Residents deserve transparency, accountability, and swift action. We urge all parties involved to prioritize this community's safety, well-being, and future.	2. SPLP again refers to its response to Task Force Comment No. 37 and to Township Comment Nos. 4 and 5, above. 3. This comment does not relate to the content of the RAP, is directed at PADEP, and does not require a response from SPLP. 4. This comment does not relate to the content of the RAP; however, as SPLP noted above, it has conducted its remedial activities in accordance with the requirements of Act 2 and the Order and has met the accelerated remedial deadlines established by the Order.
11.	Joe Babiasz	• Section 2.1 Site Setting and History The report states that a “release of petroleum product (Jet-A fuel) ... was identified on January 31, 2025.” Update to include all relevant fuels, and not just Jet-A.	SPLP refers to its response to Upper Makefield Township Comment No. 1 above.
		• Section 2.3 Summary of Site Characterization of Remediation ○ The report states that “Well C showed detections of analyzed VOCs at concentrations below Statewide health standard medium-specific	SPLP notes that this set of comments pertain to the status of its ongoing site characterization work and do not change SPLP’s proposal to perform MPE pilot testing.

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		concentrations.” However, the report does not state which other wells have detections of analyzed VOCs or Lead below the MSCs. In addition to Well C, update report to include a list of all wells with detections below MSCs. ○ The report lists MW-13S as one of the monitoring wells with contaminant concentrations above the MSCs. However, Table 2-1 does not align with this characterization when excluding the underlined 11/6/2025 results. What is the source of this characterization of MW-13S? ○ Update this section to include Lead detection results instead of limiting to VOCs. For example, Table 2-1 notes that MW-6S has multiple Lead detections, including a result above the MSC. ○ Table 2-1 shows that the 108 Spencer Rd. well had an increased concentration of several VOCs in May 2026, exceeding the MSC for Benzene and having the highest recorded concentrations of Toluene, Ethylbenzene, Total Xylenes, Isopropyl Benzene, Naphthalene, and 124-TMB at this location. ▪ Is there an update to the site characterization based on these observations? ▪ Have these observations had any impact on the interim remedial actions?	SPLP also notes that all of its site characterization work will ultimately be documented and evaluated in a revised ISCR that will be submitted to PADEP for review and approval once that work has been completed.
		• Section 2.5 Remedial Conceptual Site Model ○ This section references Figure 2-7 to depict the “distribution of historical impacts associated with the pipeline release.”	SPLP notes that this set of comments also pertain to the results of its ongoing site characterization work and do not change SPLP’s proposal to perform MPE pilot testing.

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		▪ Per Table 2-1, update Figure 2-7 to show that RW-2 and RW-3 have groundwater detections above the MSCs ▪ Per Table 2-1, update Figure 2-7 to show that MW-6S had a groundwater detection above the MSC for Lead ▪ Per Table 2.1, update Figure 2-7 to show the distribution of wells with groundwater detections below MSCs (18 wells: RW-1, RW-4, Well C, MW-10S, MW-11D, MW-12D, MW-13D, MW-13S, MW-14S, MW-1D, MW-2S, MW-3D, MW-3S, MW-4D, MW-4S, MW-6D, MW-7S, MW-9S) ○ The report refers to the distribution of wells with historical LNAPL detections in Figure 2-8. Figure 2-8 includes an observation of “LNAPL that does not appear to be related to the release detected.” Update report to include evidence of why the LNAPL is not related to the release.	SPLP again notes that all of its site characterization work will ultimately be documented and evaluated in a revised ISCR that will be submitted to PADEP for review and approval once that work has been completed.
		• Section 3.2 Attainment Remediation Objectives for LNAPL and Groundwater ○ This section makes several references to the “point of compliance,” but the point of compliance is not explicitly defined in the report. Update to include a clear definition of the point of compliance. ○ The report states that the attainment remediation objective for groundwater is “less than or equal to the Statewide health standard medium-specific concentrations.” However, the objective for	SPLP notes that “point of compliance” is defined at 25 Pa. Code § 250.302 and that “to the maximum extent practicable” is the remediation objective for LNAPL pursuant to PADEP’s Technical Guidance Manual (<i>See, e.g.,</i> Sections III.C.4 and V.D.3).

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		LNAPL is described qualitatively as “to the maximum extent practicable.” ▪ Is there a quantifiable attainment remediation objective for LNAPL? ▪ Is it possible to achieve attainment with a non-zero amount of LNAPL?	
		• Section 5.1.3 Natural Source Zone Depletion for LNAPL ○ What is the potential impact of natural source zone depletion on domestic wells in the vicinity of LNAPL?	SPLP notes that natural source zone depletion will result in decreasing levels of LNAPL over time and be beneficial to groundwater quality in the area.
		• Section 5.1.4 Carbon Injection for Groundwater ○ This section describes Carbon Injection for Groundwater, one of the selected attainment remedial alternatives. How does the injected carbon migrate underground? Does the injected carbon pose any risk to the productivity of domestic wells, longevity of domestic well pumps and pressure tanks, and/or performance of domestic POET components?	SPLP notes that this comment is outside of the scope of the RAP and seems to stem from the RAP being submitted prior to the completion of site characterization activities and the proposed MPE pilot test.¹ The potential issues noted in these questions would only be relevant if carbon injection is part of the selected remedial approach for the site.
		• Section 6.1. Planned MPE Pilot Test Specifications ○ What is the approximate footprint of the proposed equipment and housing? ○ What is the approximate noise level of the equipment during operation? Will the noise level warrant the use of sound barriers? ○ What is the maximum physical spacing of wells that can be handled by a single MPE system?	SPLP refers to its response to Task Force Comment Nos. 15 and 16 above with respect to the proposed footprint and projected noise from the proposed MPE pilot test equipment. SPLP notes that the “maximum physical spacing of wells that can be handled by a single MPE system” is dependent on the hydrogeologic parameters at a given site and can only be reliably estimated following completion of a pilot test at that site.

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		• Section 6.2 MPE Pilot Test Operation and Monitoring ○ Quantify the definition of “nearby” for deciding which “potable water supply wells will also be monitored during the pilot testing.” ○ The report states that “groundwater samples from recovery wells, monitoring wells, and multiple purpose in the testing area will be collected for laboratory analysis for Short List VOCs at the beginning, middle, and end of the test.” ▪ Provide a clear definition of “in the testing area” ▪ Will residential wells in the testing area also be sampled at the beginning, middle, and end of the test?	SPLP again refers to its responses to Task Force Comment Nos. 15 and 22 above with respect to the monitoring of nearby potable wells. Section 6.2 identified the specific wells in the testing area that will be sampled during the proposed MPE pilot test.
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