

# BOARD OF SUPERVISORS

EAST GOSHEN TOWNSHIP

CHESTER COUNTY

1580 PAOLI PIKE, WEST CHESTER, PA 19380-6199

August 27, 2021

Pennsylvania Public Utility Commission  
Attn: Secretary Rosemary Chiavetta  
400 North Street  
Harrisburg, PA 17120

Dear Secretary Chiavetta,

We, the members of the EAST GOSHEN TOWNSHIP PIPELINE TASK FORCE, with unanimous support of the EAST GOSHEN BOARD OF SUPERVISORS reiterate and echo the recent request by the CHESTER COUNTY COMMISSIONERS that the Pennsylvania Public Utility Commission utilize its powers of inspection and enforcement to halt operation of Energy Transfer's Mariner East 1 eight-inch natural gas liquid (NGL) pipeline (ME1) and its 12-inch NGL pipeline until thorough, independent geophysical investigation can be conducted into the risks presented to these lines by the sinkholes/subsidence that are occurring on a regular basis in Exton, West Whiteland Township, Pennsylvania. We share the concerns outlined by the Chester County Commissioners and align ourselves in requesting an immediate shut down for public safety.

The East Goshen Township Pipeline Task Force has been monitoring this situation closely, as many East Goshen residents commute, work, shop, and recreate in the high-density area where the subsidence is occurring. The location of ground loss, in close proximity to a busy shopping mall, commuter highway, library, and regional medical center is of great concern to us because our East Goshen residents could be irreparably harmed if a catastrophic failure occurred.

A report by The US Geological Survey, Office of Groundwater clearly states that "excessive ground-water pumping is by far the single largest cause of subsidence. The overdraft of such aquifer systems has resulted in permanent subsidence and related ground failures." Five case studies demonstrate how agricultural and municipal-industrial ground-water use have depleted critical ground-water resources and created costly regional-scale subsidence. We assume that the PUC is aware that Energy Transfer has been pumping and removing approximately 1 million gallons of groundwater per day from this area in a futile attempt to keep the bore hole and bore pit area dry. The groundwater was first being removed by truck, then it was being redeposited into nearby Valley Creek and surrounding wetlands, and now it is being redirected into a municipal stormwater system.

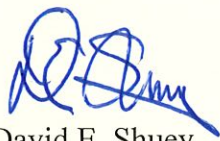
Finally, we direct the PUC to a second USGS report titled, Landslide and Land Subsidence Hazards to Pipelines. In the chapter “Land Subsidence Hazards”, the report states that “Permanent subsidence can occur when fluids (primarily water and hydrocarbons) stored beneath the Earth’s surface are removed by pumpage or drainage. The extraction of this resource for economic gain constitutes ground-water mining in the truest sense of the term.”

The USGS report goes on to define a sinkhole as “a closed depression in a karst or pseudokarst area. Sudden and unexpected collapse of the land surface into subsurface cavities is arguably the most hazardous type of subsidence. Human activities often facilitate the formation of sinkholes in these susceptible materials and trigger their collapse, as well as the collapse of preexisting subsurface cavities. Such catastrophic subsidence is commonly triggered by ground-water-level declines caused by pumping and (or) by purposeful or inadvertent diversion of surface runoff enhancing ground-water flow through susceptible rocks.”

This is important because Energy Transfer recently sent a letter to local residents in which they not only failed to properly identify the sinkholes and subsidence as such, instead calling them “earth features,” but also stated that their pipelines did not need to be properly supported underground.

We find it very alarming that the operator appears to be unaware or dismissive of the serious geological effects and safety risks associated with the construction and operation of their Mariner East pipeline project and trust the PUC shares our level of concern. We urge the PUC to take immediate action to shut down the lines and initiate comprehensive subsurface investigations. Further, we recommend that USGS or PA Geological Survey staff be involved rather than consultants hired by the pipeline operator. We trust that all contractor reports are being provided directly to the PUC, as our Task Force encountered an unfortunate situation where subsurface geological reports were subjected to “final editing” by Energy Transfer before being provided to us and elected officials.

With Kind Regards,



David E. Shuey

**Chair, Board of Supervisors**



Caroline Hughes

**Chair, Pipeline Task Force**