



February 17, 2025

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Regional Director  
Ragesh Patel  
Program Manager  
C. David Brown  
Special Projects Section Program Manager (Act 2)  
Environmental Cleanup and Brownfields  
Pennsylvania Department of Environmental Protection  
Southeast Regional Office  
2 Main St.  
Norristown, PA 19401

**Re: Sunoco/Energy Transfer Pipeline leak, Upper Makefield Township, Bucks County, PA**

Dear Director Patterson, Mr. Patel, and Mr. Brown,

Delaware Riverkeeper Network is contacting you in regards to the leak of liquid petroleum fuel (hydrocarbons) from the Sunoco/Energy Transfer pipeline in the Mt. Eyre section of Upper Makefield Township, Bucks County, PA.

It is imperative that the company shut down the pipeline immediately so that the investigations into the leak can be safely carried out and any other as yet undiscovered leaks can be tracked down and abated. This is important based on several issues:

- This pipeline is old (this section reportedly dates to 1956). The refined products pipeline begins at the Twins Oaks Terminal in Upper Chichester Township, Delaware County, Pennsylvania. In 1931 Sun built the first long-distance petroleum products pipeline in the United States. This 730-mile pipeline stretched from Twin Oaks, Pennsylvania, through Syracuse, New York, to Cleveland, Ohio, with branch lines to cities in between (<https://www.encyclopedia.com/books/politics-and-business-magazines/sunoco-inc>). The Twin Oaks Pump Station appears on historic aerial maps as far back as 1940. Sunoco became a subsidiary of Energy Transfer in 2012. The age of this pipeline is a valid reason for concern since it is now known that the pipeline has leaked in the Township and the potential for other leaks is reasonable, considering the pipeline's age and the similar environmental conditions in this area. It is not known how long the line has been leaking, nor the size or volume of

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the leak and the extent of the resulting pollution plume. Additionally, while well water sampling is underway, investigations have not been conducted of the regional groundwater to map the plume or pinpoint additional leaks or sources of pollution.

- The Twin Oaks to Newark refined product pipeline system consists of a 111-mile, 14-inch welded steel high-pressure petroleum products pipeline originating at the Twin Oaks pump station, adjacent to the Sunoco/Energy Transfer Marcus Hook Tank Farm in Marcus Hook, Delaware County, PA ([https://www.energytransfer.com/wp-content/uploads/2020/04/Marcus\\_Hook\\_FactsSheet\\_Updated\\_2019.pdf](https://www.energytransfer.com/wp-content/uploads/2020/04/Marcus_Hook_FactsSheet_Updated_2019.pdf)). The pipeline is connected to an enormous pipeline system that extends through Pennsylvania, New Jersey, and New York. If the pipeline's condition is compromised, the potential for contamination of ground water, aquifers, soil, and the environment is enormous. Leaks or spills from the pipeline can directly impact the Delaware River and the water supply of millions of people, which is of huge consequence to the region and to Delaware Riverkeeper Network.
- The fact that this pipeline may be too old to safely operate must be thoroughly evaluated. The pipeline has been replaced in other locations where the line needed upgrade. The most recent major work on the line was in 2022-2023 when Sunoco replaced the existing Delaware River pipeline crossing with 2,500 feet of pipeline installed underneath the Delaware River through the process of Horizontal Directional Drilling (HDD). The HDD entered the ground to go under the river in Upper Makefield Township by Houghs Creek near Oakdale Ave. and Maple Shade Ave. On the New Jersey side of the river, 301 feet of exposed pipeline, visible in the bed of Jacobs Creek, was removed and replaced. The new pipeline was connected to the new length of pipeline that replaced the old one. This replaced section of pipeline begins in Hopewell Township and continues through to Newark and Linden, New Jersey. Delaware Riverkeeper Network monitored the replacement project. (See: <https://delawareriverkeeper.org/issues/climate-change-fossil-fuels-and-energy/jacobs-creek-pipeline-project/> ). Are there other locations in need of replacement that have not been identified yet? This leak is a warning signal that DEP must recognize; the only responsible action is to shut down the use of the line until the entire line can be evaluated and proven competent.
- According to what has been reported at public meetings, the company's leak detection technology is not accurate enough to detect a leak under a certain magnitude. This lack of ability to detect a small leak or series of small leaks means that a leak can continue unnoticed and, over time, reach a water supply well or surface water. This lack of ability to detect leaks is a blind spot in the company's system that requires a more accurate and robust investigation such as total excavation. Additionally, the report that gas smells in their water were reported as long ago as 2023 by an area resident but no leak was found by Sunoco, adds to questions about the reliability of the company's detection system. Shutting down the line during this assessment is the safest way to prevent undetected leaks from continuing.
- Energy Transfer/Sunoco has had many violations in its larger system that are red flags that DEP must heed. Some of these are well known such as the violations related to Mariner East, twin Sunoco/Energy Transfer liquid gas pipelines. Since 2014, Sunoco has transported natural gas liquids a/k/a hazardous volatile liquids including butane, ethane and propane or some combination thereof between Delmont, Westmoreland County, and Twin Oaks, Delaware County under its certificates of

public convenience (CPCs) that have been deemed to apply to both Mariner East 1 and Mariner East 2 pipelines as an authorized expansion of the same intrastate service. The Mariner East 1 and 2 pipelines are connected to this pipeline that runs through Upper Makefield.

<https://casetext.com/case/sunoco-pipeline-lp-v-pub-util-commn>

- On July 6, 2023, Sunoco Pipeline, L.P. entered into two consent assessment of civil penalties with DEP. “Sunoco agreed to pay \$660,000.00 to resolve numerous violations of the Clean Streams Law, and the Dam Safety and Encroachments Act, that arose during Sunoco’s construction of the Pennsylvania Pipeline Project – Mariner East II (“ME2”). The violations occurred between 2018 and 2021 in Chester, Berks, Blair, Cambria, Chester, Cumberland, Delaware, Perry, and York Counties, PA.”. (See: <https://www.ahs.dep.pa.gov/NewsRoomPublic/articleviewer.aspx?id=22327&typeid=1>)
- A 2014 Notice of Violation was issued to Sunoco for pipeline corrosion that was not remediated within the timeline that PHMSA required. This was in the Greenburg Area of PA and was addressed in a letter from the Twin Oaks Terminal, Aston PA. See: ([https://primis.phmsa.dot.gov/enforcement-documents/120145005/120145005\\_Operator%20Response%20to%20Notice\\_10312014.pdf](https://primis.phmsa.dot.gov/enforcement-documents/120145005/120145005_Operator%20Response%20to%20Notice_10312014.pdf) ). There are other violations and pollution releases by Sunoco and/or Energy Transfer at the Twin Oaks Terminal and they have a history of violations throughout their national pipeline system, some of these are listed here: <https://violationtracker.goodjobsfirst.org/prog.php?parent=energy-transfer> These incidents and violations are underlying the public’s lack of trust that Sunoco and Energy Transfer will act in their benefit. It is crucial that independent agencies step up, namely DEP and the PA Department of Health (DOH).
- The impacted community needs support and assistance from DEP and the DOH. The government agencies must not defer to Sunoco/Energy Transfer to handle this crisis. We understand measures are being taken by Sunoco/ET such as bottled water and a few POET systems but this is not enough to provide what is needed immediately. DEP should establish a web page now that is interactive, providing resources and information that is independent from the companies that have caused the pollution. The website should have a portal which will accept reports and input from the community and a companion hotline should be set up by DEP/DOH rather than only the Sunoco hotline. It is important that people know they are reporting to an agency that will respond and that is not conflicted by their financial investments, which can influence and bias the companies’ response. This need for independence and trust extends to those who are doing the water well and environmental sampling and pollution plume mapping, and those supplying results and information to the impacted community.
- More complete information is needed for the public. A map that show the leaks that have been discovered, the excavation underway, and the location of the pollution plume and the migration pathway through groundwater is critical information the public needs. Sampling of Dyers Creek and Houghs Creek should be considered. A timeline that explains all actions/work by the company should be available and kept up to date on line.

In addition to these requests, we repeat that we request immediate action be taken by DEP and PHMSA to require that the subject pipeline be shut down and comprehensive investigations be launched into the entire pipeline’s safety and competency.

Thank you for your consideration. We are happy to meet to further discuss these pressing issues.



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