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August 7, 2025

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**RE: Twin Oaks Pipeline Anomaly and Inspections**

To Whom It May Concern:

On August 5, 2025, Upper Makefield Township learned for the first time that Energy Transfer has identified multiple anomalies in the Twin Oaks Pipeline within Upper Makefield Township which will require excavation. Energy Transfer's disclosure comes only after being prompted by the Township's geologist, David Fennimore, who questioned the location of anomalies referenced during a July 31, 2025 meeting. During the July 31, 2025 meeting, through a mediator, Mr. Fennimore directly asked whether any proposed digs to validate the crack tool results are located on the portion of the pipeline in Upper Makefield Township. Mr. Gordon responded that he "[did not believe] there's one in Upper Makefield Township" but that it was close by and "closer to the river." July 31, 2025 Zoom Call at 1:05:47. As Energy Transfer revealed on August 5, 2025 there *are* dig "sites," plural, and that they are in Upper Makefield Township.

PHMSA confirmed on August 6, 2025 that there will be twelve excavations east of the Bucks pump station, including those located in Upper Makefield Township.

Energy Transfer's acknowledgment of an anomaly follows months of in-line inspections and repeated public statements suggesting there were no anomalies in the Twin Oaks Pipeline in Upper Makefield Township. Energy Transfer's statements were, at best, misleading and, at worst, made with reckless disregard for the public safety. Upper Makefield Township has repeatedly requested access to the in-line inspection results only to be told, for example, that Energy Transfer "continue[s] not to find any evidence of any other issue." April 24, 2025 Townhall Meeting; 7:30-10:00. We cannot continue to accept Energy Transfer's self-serving assessments and determinations about the scope of the anomalies along the Twin Oaks Pipeline.

On August 5, 2025, Energy Transfer noted that "[A]fter a review and analysis of the reported ILI features, there were no immediate repair conditions per PHMSA regulations at 49 CFR 195.452." This statement carefully avoids referencing the analysis Energy Transfer undertook to determine that the anomaly it discovered does not require immediate repair. We cannot disagree more vehemently with Energy Transfer's conclusion. An operator must take "prompt action to address all anomalous conditions in the pipeline that the operator discovers through the integrity assessment or information analysis." 49 CFR 195.452(h)(1).

We note that an immediate repair condition includes "an anomaly that in the judgment of the person designated by the operator to evaluate the assessment results requires immediate action." The clear implication is that Energy Transfer has concluded that the anomaly does not require immediate action. Upper Makefield Township is astonished by that conclusion. The pipeline, now with a documented history of failure is located along a navigable waterway in a populated area, both factors in finding that the pipeline is in a High Consequence Area. 49 CFR 195.450.

Upper Makefield Township repeats its request that Energy Transfer and PHMSA provide all in-line inspection data in its possession. Given the unknown nature of the anomaly, we ask that Energy Transfer immediately notify impacted residents. Further, we demand that Energy Transfer take immediate action to address any anomalies it has identified in Upper Makefield Township and all along the Twin Oaks Pipeline. We cannot allow history to repeat itself and another leak intrude upon our community.

Very truly yours,

**GRIM, BIEHN & THATCHER**

A handwritten signature in black ink, appearing to read "William D. Oettinger", written in a cursive style.

By: William D. Oettinger