

May 22, 2019

Mr. Matthew Gordon  
Sunoco Pipeline, L.P.  
535 Fritztown Road  
Sinking Spring, PA 19608

Re: Hydrogeological HDD Re-Evaluation Report  
U.S. Route 222 Crossing 16" Horizontal Directional Drill Location (S3-0200-16)  
Permit No. E06-701  
Cumru Township, Berks County

Dear Mr. Gordon:

The Pennsylvania Department of Environmental Protection (DEP) is requesting more information from Sunoco Pipeline, L.P. (SPLP) related to the HDD Re-Evaluation for the U.S. Route 222 site, HDD# S3-0200-16 and permitted under Permit E06-701, posted on the DEP Mariner East II pipeline portal webpage on February 15, 2019.

1. Several inconsistencies and inaccuracies with information presented within the re-evaluation were identified.
  - a. Revise the report to include the correct HDD number, PA-BR-0075.0000-RD-16, throughout the report (examples-cover page, headers throughout, and Figure 1. of Attachment 2).
  - b. There are several references to this HDD crossing under Peach Tree Lane. Revise the report to remove Peach Tree Lane references and replace them with the correct roadway reference, which appears to be Old Lancaster Pike.
  - c. Figure 1. of Attachment 2-This figure appears to depict the permitted 16-inch HDD profile and plan view. However, it appears the stationing has changed. While the "permitted 16-inch HDD" shown on Figure 1. appears to be consistent with the actual permitted 16-inch HDD profile and plan (dated October 21, 2016), there are a few inconsistencies between the two HDD profiles and plans. Provide an explanation of how Figure 1. should be interpreted for comparison against the permitted 16-inch HDD profile and plan and confirm that the "permitted 16-inch HDD" shown on Figure 1 does accurately represent the actual permitted 16-inch HDD profile and plan for this site.
2. Relating to the Analysis of well production zones and use of information obtained during construction of the 20-inch pipeline;

The re-evaluation report fails to include an evaluation of the information and data collected for the eleven private water supplies within 450 feet of the proposed HDD or those water supplies

that are in the vicinity (beyond 450 feet) of the proposed HDD. It is also unclear about whether any of the private water supplies identified within 450 feet are the same as any of the twenty-one water supplies within 0.5 miles that were identified from the PaGWIS database.

Any private or public water supply data and information obtained within 450 feet, or otherwise obtained in the vicinity of the 20-inch or proposed 16-inch HDD, should be used and discussed as part of this HDD re-evaluation. This data should include but not be limited to: any applicable water supply sampling data obtained and any water supply complaints that SPLP received for water supplies within 450 feet of the HDD or within the general vicinity during construction of the 20-inch pipeline. The results of the SPLP's water supply sampling program, investigation and disposition of any complaints, and any correlation or non-correlation to SPLP's construction activities should be evaluated and discussed in the HDD re-evaluation report. Use of this information should be used to demonstrate that the proposed 16-inch HDD activity will minimize the potential for IR's and impacts to water supplies. Please revise the re-evaluation report to include this information.

3. Related to *Pipe Stress Radius*: Provide further explanation of how the following statement applies to this HDD re-evaluation, "Pipe stress allowances are an integral part of the design calculations performed for each HDD."

The DEP's review of the geologic aspects of this HDD re-evaluation and the geologic related comments represented above were completed by a Licensed Professional Geologist.

Upon receipt, DEP will post SPLP's response to this letter on the DEP pipeline portal webpage for public comment. The public will have 5 additional business days from the date of posting on the website to provide DEP any additional comment.

If you have any questions or would like to discuss this letter, please contact me at [scwilliams@pa.gov](mailto:scwilliams@pa.gov) or 717.705.4799.

Sincerely,



Scott R. Williamson  
Program Manager  
Waterways & Wetlands Program

cc: Larry Gremminger, Energy Transfer Partners/Sunoco Pipeline, L.P. (pdf copy)  
Monica Styles, Sunoco Pipeline, L.P. (pdf copy)  
Doug Hess, P.G., Skelly and Loy  
Shawn Fasl, Berks County Conservation District (pdf copy)  
Tom Yeager, P.G., Safe Drinking Water Program (pdf copy)