



# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest Regional Office

February 27, 2018

Mr. Matthew Gordon  
Sunoco Logistics, L.P.  
535 Fritztown Road  
Sinking Spring, Pennsylvania 19608

RE: Hydrogeological Re-Evaluation Report  
HDD S2-0070, E11-352  
William Penn Avenue Crossing  
Jackson Township, Cambria County

Dear Mr. Gordon:

The Department (DEP) is requesting more information related to the HDD Analysis for S2-0070, E11-352, posted on the DEP Mariner East II pipeline portal webpage on January 2, 2018.

1. Sunoco (SPLP) states that HDD activities could affect individual well use during active drilling for wells located within 150 linear feet of either side of the profile. SPLP offers no justification of how the 150 linear feet designation was determined. Please provide justification, sealed by a Pennsylvania Professional Geologist, that wells outside of 150 feet of the profile will not be impacted.
2. With regard to water supplies that might be impacted by these HDD activities, SPLP must address those impacts in an acceptable manner. SPLP has the option to enter into written agreements with all private water supply owners whose water supplies may be impacted by this Drill, regardless of their location from the Drill, as part of this re-evaluation, and in advance of commencing the HDD. Under the agreements, SPLP must provide short and long-term replacement potable water supplies adequate in quantity and quality for the purposes served, to the satisfaction of all potentially affected water supply owners. The agreements should provide for SPLP to conduct water quality and quantity testing of each potentially affected water supply prior to, during, and after the HDD activities. SPLP needs to provide proof of these agreements to the DEP with a response to this letter.

In the alternative, if SPLP chooses not to pursue these agreements with the private water supply owners, it must provide a discussion of actions to be taken by SPLP to prevent water supply impacts from occurring. SPLP needs to demonstrate how, in the absence of the agreements described above, SPLP will avoid impacts to all water supplies. SPLP's approach should include the utilization of technical and non-technical measures to avoid and minimize such impacts, including, but not limited to, the conversion of the HDD to a trench installation, use of other trenchless construction methods, the use of American

Standards Institute/National Sanitation Foundation (ANSI/NSF) Standard 60 approved gels or other approved additives that could prevent such impacts from the Drill, or some combination of the above. To the extent that SPLP proposes to use any ANSI/NSF 60 certified HDD additives, consistent with Special Condition H.5 contained in DEP Permit No. E11-352, SPLP will need to demonstrate that the manner in which SPLP anticipates using each additive is consistent with the manner indicated in the ANSI/NSF Standard 60 certification for that additive. In addition, SPLP should state whether it will be following all conditions included as part of the additive's certification or, if not, provide an explanation for any deviation(s) from the certification and why that deviation is necessary and acceptable.

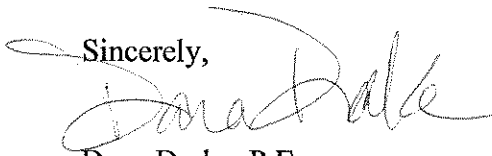
3. The Report discusses potential changes in water *quality*, but also needs to discuss potential changes to water *quantity*, as the potential exists for the HDD bore to adversely impact the yield of private water supply wells. Please describe how this will be done consistent with applicable provisions of the latest versions of the Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan (February 6, 2018), and the Operations Plan (January, 2018).
4. Additionally, DEP requests the following information related to the project's potential effect on well production zones and water supplies:
  - a. An analysis of private water supply well production zones and how the proposed HDD activities interact with them (listing the depths of wells and pumps is insufficient).
  - b. A map showing all the private water supplies in the correct, surveyed locations.
  - c. The location and depths of private water supplies should be shown on a profile map to show the correlation of the well depth with the HDD depth.
  - d. A description of the following: if there is short tripping of the tooling during the HDD, what are the chances of a plunger-effect occurring during either the drilling or reaming phases or during pipe pullback, and could this affect private water supplies?
  - e. Water quality sample results of the private water supplies that may be affected.
  - f. Water quantity test results (pump yield tests) of the private water supplies that may be affected.
5. SPLP states that all landowners with property located within 450 feet of the Right-of-Way (ROW) were sent a notification letter. DEP requests copies of all letters sent to individual landowners within 450 feet of the HDD. Please provide both a redacted version for posting on DEP's webpage and an unredacted copy of each letter for our information. DEP also requests the property owners' response to the notifications, if any were received by SPLP. Please provide both a redacted (landowner information) and unredacted copy of each response

6. Boring B2-2E and B2-3E were installed to locate competent bedrock. According to the profile map, the locations of these borings are outside the terminal ends of the HDD. Please provide the justification for placing these borings outside the limits of the HDD.

Upon receipt, DEP will post requested additional information 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 regarding this matter, please contact me at 412.442.4149, or by email at [dadrake@pa.gov](mailto:dadrake@pa.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Dana Drake".

Dana Drake, P.E.  
Environmental Program Manager  
Waterways & Wetlands Program

cc: Richard Wardrop, P.G. – GES  
Jack Vasalani, P.G. – GES