

Memo

East Goshen Township

1580 Paoli Pike

West Chester, Pa 19380

Date: October 2, 2019
To: Department of Environmental Protection
From: Rick Smith, Township Manager
Re: Comments on Horizontal Drill Analysis
Eldridge Drive / North Chester Road
PADEP Section 105 Permit No. E15-862
PA-CH-0370.0000-RD
(SPLP HDD No. S3-0500)

Dick

At their meeting on October 1, 2019 the East Goshen Township Board of Supervisors approved the submission of the following comments to the Department of Environmental Protection for its consideration.

The Board also requested that I provide the Department with a copy of comments prepared by Christina Morley, who is a member of our Pipeline Task Force.

Using HDD Methodology

The reevaluation report notes that the first IR occurred as the drill was entering at a depth of 31 feet and the second occurred when the drill was exiting at a depth of 25 feet. The root cause of both IRs was attributed "poor soil and rock/overburden strength overburden".

Sunoco has proposed to increase the entry/exit angle from 10 degrees to 15-16 degrees in order reduce the potential for IRs. The goal is to get the pilot bore hole down into competent bedrock ASAP.

We would suggest that this risk could be reduced by installing a sleeve to a depth of 40 feet or competent bedrock at each entry point. This sleeve could be installed by direct pipe bore methodology.

In addition this risk could be further reduced by using the two drilling rigs and having them meet in the middle. Sunoco refers to this as an "intercept drill" and is proposing to use this on the SPLP HDD No. S3-0471.

If HDD is to be approved this would provide the best chance for minimizing any future IRs.

Re-route Analysis

The reevaluation does not note that Interstate Energy/Adelphia has a pipeline easement that is immediately east of and adjacent to the public-right-of way for North Chester Road.

Sunoco is currently using part of Interstate Energy/Adelphia easement for a construction area, subject to temporary construction easements.

In addition based on the plan and profile that was submitted with this reevaluation Sunoco intends to install some of the 20-inch pipeline installed within existing permanent easements that they have obtained for this project that overlap the Interstate Energy/Adelphia easement.

It would seem to be relatively simple for Sunoco to obtain the additional permanent easements required.

Then, at the northern end of this segment have the 20-inch pipeline cross North Chester Road; utilizing either with a conventional bore, direct bore, or open cut construction and then install the 20-inch pipeline utilizing open cut construction to its connection point at the south end of this segment. This would eliminate any potential for an IR. In addition if the North Chester Road crossing was done by conventional bore or direct bore, this alternative would not result in any additional traffic impacts, since all of the construction would take place outside of the public road right of way.