

DEP Permit # E34-136
DEP Permit HDD Reference # PA-JU-0004.0000-WX-16
DEP HDD # S2-0156
Township – Lack
County - Juniata
HDD Site Name – Old Mill Road Crossing

1st Public Comment Period

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1. Comment

Pursuant to the Corrected Stipulated Order entered on EHB Docket No. 2017-009-L on August 10, 2017 (“Order”), and on behalf of Clean Air Council, Mountain Watershed Association, Inc., and the Delaware Riverkeeper Network (“Appellants”), please accept these comments on Sunoco Pipeline L.P.’s (“Sunoco”) re-evaluation report (“Report”) for the horizontal directional drilling (“HDD”) indicated by drawing number PA-JU-0004.0000-WX-16 (the “HDD Site”).

1. Sunoco must protect the drinking water well it identified.

Sunoco asserts that it identified one well in the vicinity of the HDD alignment, approximately 1,240 feet northeast of the western entry/exit point. Unfortunately, Sunoco knows very little about this well. The Report admits: “No information pertaining to the well depth, depth to water or well yield was reported.” This falls far short of analyzing the well production zone, as required by the Order. Nevertheless, Sunoco must ensure this well is protected from potential impacts related to its drilling

and construction. The Department should require Sunoco to evaluate the likelihood of communication with this well, taking into account the local carbonate geology and fracture patterns. If the risk to this well cannot be fully ruled out, the resident should be offered the same course of well testing offered to other residents.

2. Sunoco's cursory dismissal of geotechnical surveys is inadequate.

In karst areas where Sunoco chooses not to perform geophysical surveys, the Order requires that Sunoco provide an explanation of why geophysical methods were not used. Sunoco has not taken this requirement seriously. It dismisses the use of geophysics in a single, conclusory sentence: "The data generated from these surveys will not reduce the risk of a shallow IR near the entry or exit of the HDD as observed during 20-inch operations." Without more information, it is unclear whether this conclusion is even accurate. Geophysical methods could help inform, for example, whether the entry and exit pits are in optimal locations, or if there might be other problem areas along the alignment. Sunoco has avoided conducting geophysical surveying as much as possible in its construction of the Mariner East pipelines, and the public cannot trust that Sunoco is giving serious consideration to their use. Before the Department allows Sunoco to proceed with its plans for the Site, Sunoco must, at the very least, provide a full explanation for why geophysical surveys would not make those plans safer. In the absence of a legitimate explanation, geophysical surveys should be required.

3. Sunoco's proposed pullback area represents an additional threat to wetlands.

Sunoco's revised plans for the installation of the 16-inch line call for the pipe to be pulled back across two wetlands that are directly east of the HDD endpoint, W-58, and W-Q64. This appears to be a change from the previous plans, in which pullback was to occur to the west of the alignment, avoiding the wetlands. The Report next addresses impacts this plan will have on the wetlands. The Department should require Sunoco to evaluate and discuss options for avoiding impacts to these wetlands, including extending the HDD under the wetlands instead of pulling back through them, and staging the pullback to the west of the alignment. If there is a practicable alternative for avoiding impacts to these wetlands, Sunoco must take it.

4. The alternatives analysis does not analyze alternatives besides HDD.

The alternatives analysis in the Report is inadequate and based on incorrect information. It states that "[t]he crossing distance of the emergent and forested wetlands, which are the most expansive natural features crossed by the HDDs, is beyond the technical limits of a conventional auger bore." That is simply false. The plan view for the 16-inch HDD shows clearly that the creek crossing is narrow, the road crossing is maybe 50 feet, the crossing of W-K59 is under 70 feet, and the crossing of W-K60 is under 200 feet. While Sunoco has made wildly varying statements on the technical limits of conventional auger boring, in no circumstance

has it contended that an auger bore cannot handle a crossing less than 200 feet. Perhaps that is why it has uniquely refrained in this Report from specifying what those technical limits are.

Auger boring may or may not be preferable at this location. Unfortunately, since Sunoco has pre-determined that it did not want to consider it, and made little effort to conceal that in the Report, no analysis has been done. This is contrary to the requirements in the Order for an alternatives analysis.

Furthermore, there are options other than HDD, auger boring, and open cut. In recent re- evaluation reports, Sunoco has spoken of using “Direct Pipe,” for example. But no other options are put on the table for discussion.

When Sunoco concludes, “In summary, a combination of open-cut and conventional bores will not work as an alternative to the Old Mill Road HDD,” it is not based on any real analysis of open-cut options coupled with conventional boring, contrary to the Order. Thus, the Department should reject this Report and require a revised report which includes a compliant alternatives analysis.

Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site. (1-5)

Letter – [Clean Air Council – Old Mill Road Crossing - 2-19-19](#)