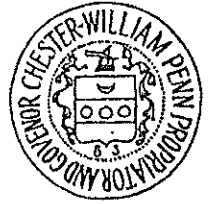




THE COUNTY OF CHESTER



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July 3, 2019

Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101
via email: ra-epipelines@pa.gov

**Re: PA DEP Permit No.: E15-862
HDD Reevaluation Report
S3-0320 -- Herman O.W. Drive Crossing**

Dear Sir/Madam:

The County of Chester hereby submits its comments to the above referenced HDD Reevaluation Report submitted by Sunoco Pipeline, L.P. Specifically the County of Chester herein submits the July 2, 2019 review comments of the County's experts McCormick Taylor. A complete copy of the McCormick Taylor July 2, 2019 review comments is attached.

The McCormick Taylor review comments are as follows:

- o The Report indicates that the initial HDD for the 16-inch pipe resulted in an Inadvertent Return (IR) and that the HDD of the 16-inch pipeline "is yet to be completed". The report should address planned completion of the 16-inch pipeline, particularly since the proposed alignment more closely matches the approved 16-inch pipeline's location including entry and exit points.
- o The Report discusses appropriate grouting techniques but does not discuss how the previous IR was adequately addressed, or whether it is anticipated to release in this area again.
- o The Report does not evaluate the anticipated drilling pressures to complete the remainder of the 16-in bore, and whether those anticipated pressures will result in additional IRs.
- o The Alternatives Analysis includes repeated statements that "comparing this plan of construction to a 15-gallon IR event, results in SPLP's opinion that HDD remains the preferred pipeline installation method." However, as stated in the introduction, the 16-

inch pipeline installation caused the 15-gallon IR event during the pilot bore and the remainder of the boring has not been completed – therefore it is not appropriate to assume that further IR events would not occur during its completion.

- o The Report does not address either the engineering analysis that led to the Permitted alignment, nor the (quite different) partially completed 16-inch pipeline alignment. It would be beneficial to compare the assumptions that have led to three varied alignments being proposed for a single HDD corridor.

- o The proposed revised alignment more closely parallels the partially completed 16” pipeline bore for long distances. The report does not address the possible loss of drilling fluid to the parallel bore where faults and fractures could allow flow to migrate. There is potential that this can result in unexpected IR events along the other bore’s path.

- o Section 3.2 of the HDD Hydrogeologic Reevaluation Report (HRP) states that MEII HDD IRs have occurred in similar geologic settings where “bedrock is densely fractured (sometimes indicated by a fracture trace...)”, yet the summary (Section 4.2) states “All of the MEII IRs that have occurred in this region, to date are exit IRs where the overburden is relatively thin.” As shown on Attachment A, two fracture traces occur in close proximity of Shamona Creek and associated wetlands. The proposed profile indicates only 75’ depth of cover in this area, and no borings have been provided to analyze geology of this location. Additional documentation and calculations to support why the pipeline depth at this location was selected should be provided.

- o The Best Management Practices included in the Conclusion of the report are generic. Project specific practices should be noted and employed - including specifying that monitoring reports including drilling pressures and return amounts be kept and filed with the Department; signing and sealing reports by qualified professionals; noting the frequency of reporting; specifying the pilot tool and drilling pipeline diameters; specifying the exact methods of monitoring for inadvertent returns and loss of fluid, and qualifying the specific Loss Control Materials that can be used.

- o A site-specific IR Plan describing in detail how potential IRs will be addressed both within and beyond the project ROW, should be required. The plan should address all requirements that FERC regulated pipelines must provide, including measures to be followed in uplands, wetlands, and waterbodies for both containment and cleanup. Equipment and materials to be onsite and/or available on short notice should be provided including any subcontractors on-call. (See FERC Guidance for Horizontal Directional Drill Monitoring, Inadvertent Return Response, and Contingency Plans, Draft, October 2018)

- o Where IRs are most likely, including entry and exit points and along known faults/traces, adjacent property owner right of entry should be obtained in advance of construction to facilitate efficient containment and cleanup of IR fluids.”

In addition, the County of Chester submits the following comments from Jan Bowers, Director, Chester County Water Resources Authority, and Michael Murphy, Director, Chester County Department of Emergency Services. Director Bowers states that installing the 20” pipeline at a greater depth is preferable since the reports indicate this will reduce the risk of construction impacts to properties, existing infrastructure and environmental resources compared to other installation methodologies. Director

Murphy concurs that from a public safety perspective, installing the pipes deeper is preferred because it would lessen the chance that the pipelines are struck by third party digging.

Very truly yours,

A handwritten signature in black ink, appearing to read "K. Mayock", with a long, sweeping flourish extending to the right.

Kristen K. Mayock, Esq.
Deputy Solicitor
The County of Chester

Enclosure (7/2/19 McCormick Taylor comments)