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By Email

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Re: Comments on Report for HDD PA-CH-0111.0000-RD (HDD# S3-0300-20)

To whom it may concern:

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-CH-00111.0000-RD (the “HDD Site”).

1. The revised profile may be better, but needs to be justified.

The Report indicates that Sunoco’s solution to improve the drilling plans at the Site is to steepen and deepen the drilling, and use BMPs which appear to be the same boilerplate BMPs it uses as a matter of course. Deepening the profile may help, simply by having more overburden shielding the surface. However, the revised profile is only moderately deeper than the as-built 16-inch line. The Terracon geotechnical borings discovered highly weathered rock down to 116 feet bgs. This appears to contradict the seismic surveying, which found competent bedrock at 10 to 27 feet bgs. It is thus not clear at what depth the rock strengthens, and it is not clear that the horizontal run of the revised HDD would be located at that depth. Sunoco should justify the depth it has chosen.

While steepening the angle of entry further is likely not feasible without taking extra measures, lengthening the profile to allow for steeper entry and exit seems to be a possibility. It appears that another stretch of wetland could be avoided by lengthening the profile to the east. There is also room to lengthen it to the west. There may be reasons why this is not ideal, but Sunoco does not appear to have analyzed that alternative. The Department should require it to.

2. Sunoco must offer water sampling during installation of the 20-inch pipe.

The Report states, “With landowner permission, eight wells within and adjacent to 450 ft of the original permitted HDD profile were sampled. This sampling effort will be repeated after installation of the 20-inch pipeline is completed.” Pursuant to Paragraph 8 of the Order, Sunoco

must offer water sampling *during* installation as well. Before approving this revised drilling plan, the Department should ensure that Sunoco will offer sampling during installation.

3. The Department should require Sunoco to generate a credible plan to handle groundwater discharge.

Sunoco should have in place a plan to deal with the expected groundwater discharge at the Site. The Hydrogeologic Re-evaluation Report states that “local groundwater levels and experience during installation of the 16-inch line indicate a risk of groundwater discharge at the northwest entry/exit. Drilling plans and Best Management Practices should account for these conditions.” Sunoco also identifies that groundwater feeds into a stream which runs into Marsh Creek. The Report, however, nowhere appears to account for the risk of groundwater discharge, both in draining the groundwater that feeds the stream or in running off beyond the limits of disturbance.

This is a consequential risk. Elsewhere in Chester County, as of this writing, Sunoco’s work is causing groundwater discharge to run across a neighbor’s yard and into a pond which it is polluting. The Department has not required Sunoco to abate the harm. That is unacceptable.

The Department cannot allow Sunoco to continue to breach groundwater and simply let it out to run outside the limits of disturbance onto other people’s property and into waters of the Commonwealth. The time to plan to prevent that is now.

4. The Department should require Sunoco to use the geophysical surveying results in planning the deepened bore.

The Hydrogeologic Re-evaluation Report states at Section 2.4, “RETTEW / Enviroscan (Rettew) completed a geophysical survey at the HDD S3-0300 site in January 2019. The purpose of the survey was to detect and delineate subsurface fracture zones that could contribute to potential IRs and/or losses of circulation (LOCs), and to determine the rock profile and rock strength for ease-of-excavation along the HDD path.” Given the Site history and geology, this appears to have been a sensible approach. However, it is unclear how Sunoco used this information for its re-evaluation. The revised proposal is to deepen the bore and use certain boilerplate BMPs. As with all of these re-evaluation reports, Sunoco does not disclose how these BMPs differ from what it did while drilling the first pipe, and thus it is unknown whether they represent an improvement.

One of the BMPs is as follows: “SPLP will provide the drilling crew and company inspectors the location(s) data on potential zones of higher risk for fluid loss and IRs, including the area related to previous IRs, and potential zones of fracture concentration identified by the fracture trace analysis, so that monitoring can be enhanced when drilling through these locations.” It would appear that Sunoco is taking into account fracture traces but not the geophysics that it specifically employed to identify fracture zones. This does not make sense. The Department should require Sunoco to use the geophysical information in its BMPs as well as the fracture traces and the locations of previous IRs.

5. Sunoco should explain why it proposes to move the centerline of the 20-inch pipe.

The plan and profile image indicates “switched 20” centerline location,” but there is no indication of why Sunoco would have moved the centerline of the planned 20-inch pipe. An explanation should be provided.

Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site.

Sincerely,

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