

**DEP Permit # E38-194**  
**DEP Permit HDD Reference # PA-LE-0005.0000-RD-16**  
**DEP HDD # S3-0091**  
**Township – South Londonderry**  
**County - Lebanon**  
**HDD Site Name – School House Road Crossing**

**3<sup>rd</sup> Public Comment Period**

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**1. Comment**

On July 24, 2019, the Department requested additional information from Sunoco regarding its reevaluation (“Report”) of the horizontal directional drilling (“HDD”) indicated by drawing number HDD PA-LE-0005.0000-RD-16 (the “Site”). This was the Department’s second attempt to get Sunoco to provide the information needed to complete the reevaluation of the Site. Sunoco responded to the Department on July 30, 2019. 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 regarding the Department’s request and Sunoco’s July 30, 2019 response (“July Response”).

**1. Sunoco continues to avoid providing a geologic justification for its plan.**

Appellants commend the Department for continuing to push Sunoco to provide a data-based justification for the specific drilling path it has chosen. In its first request

to Sunoco, the Department rightly pointed out that the Report provides no analysis “tying the revised drill path to any specific zones noted in the core boring logs or why the revised 16-inch path was chosen.” The Department also pointed out that Sunoco “failed to fully utilize information gathered during the HDD of the 20- inch bore as part of the HDD Re-evaluation for the 16-inch pipeline.” The Department thus requested Sunoco gather this information and, specifically, that Sunoco include the “full geologic profile from the drilling of the 20-inch HDD.” Sunoco ignored the Department’s request, leading the Department to again ask for this information in its July 24, 2019 letter. The Department also reiterated its request for Sunoco to provide data regarding the potential for communication between the boreholes. On both counts, Sunoco has unabashedly defied the Department again in its July Response. Instead of providing the data it relies on for its redesign (or any analysis of that data), Sunoco has provided a short paragraph about how data can be used in general. Sunoco’s continued refusal to abide by the Department’s request suggests it either does not have the data it claims to have, or that the data or analysis would not support the redesigned path. Appellants urge the Department to continue pushing for this critical information.

**2. Sunoco has not articulated an adequate plan for managing mud pressure.**

The Department asked Sunoco to explain how it will monitor/adjust mud pressure as it approaches the area of the previous IR. Sunoco’s answer, in effect, is that it will know when it knows. Sunoco will reduce mud pressure or stop completely when resistance drops. Sunoco ignores the possibility of using a lower pressure to begin with. In general, more pressure is needed to cut through higher-integrity rock, but that still leaves what is potentially a wide range of drilling mud pressure readings that could successfully be utilized when cutting through the higher integrity rock. There is nothing in Sunoco’s plans or explanation that commits Sunoco to using the lowest mud pressure possible. Using a higher pressure than necessary increases vulnerability to IRs, especially in Sunoco’s “wait and see” approach. Sunoco explains that while drilling the 20-inch bore, “drilling fluids were being circulated at a rate of 330 gallons per minute or the equivalent of approximately 1000-1200 lbs of pressure at the mud unit.” Sunoco should discuss whether and how much this pressure can be reduced for drilling the 16-inch bore.

**3. The Report continues to lack basic information and analysis regarding water supplies.**

As Appellants previously pointed out, Sunoco has identified two private water supplies within close proximity to the proposed drilling alignment but has offered no plan for protecting these water supplies or analysis of the well production zones that supply them. In previous reevaluations, the Department has pressed Sunoco on such violations of the Order and required more information. Here, the Department seems poised to let Sunoco get away with cutting corners. Sunoco has consistently demonstrated that it will take full advantage of any lack of oversight. It is incumbent upon the Department to maintain the integrity of this reevaluation process and

preclude Sunoco's attempts to provide less and less information. The Department should require Sunoco to provide additional information regarding the water supplies at the Site, including: details regarding water testing requests and results; an analysis of the well production zones; a plan for protecting these water supplies; and a commitment to conduct testing in association with the installation of the 20-inch pipe.

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

Letter – [Clean Air Council – 8-5-19 – School House Road Crossing](#)