



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest Regional Office

June 14, 2018

Mr. Matthew Gordon
Sunoco Logistics, L.P.
535 Fritztown Road
Sinking Spring, Pennsylvania 19608

Re: Hydrogeological Re-evaluation Reports
HDD S2-0080, Spinner Road Crossing
Munster Township, Cambria County

Dear Mr. Gordon,

The Department of Environmental Protection (“DEP”) requests more information related to the Hydrogeological Re-evaluation Report (“Report”) for the HDD S2-0080 submitted to our office on May 24, 2018.

DEP requests the following:

1. Please provide additional information on the efforts of Sunoco Logistics L.P. (SPLP) to locate the three mine vents. If encountered by the HDD operation, the vents are a conduit for the potential loss of drilling fluids to the mine pool or surface. SPLP should present an assessment of the potential impacts if one of these mine vents is intercepted or encountered by the HDD operation. Furthermore, the recommendations in Section 4 of the Report should be fully integrated into the resubmitted Report. Also, in accordance with the Report, the drilling plan should identify contingency measures to be employed in the event that one or more of the underground mine vent boreholes are encountered during HDD advancement.
2. Given the underground mining conditions at this site and the proximity of vent boreholes, gas monitoring equipment and appropriate safety procedures must be identified and incorporated into the Report.
3. The Report discussion should also identify and discuss the impacts of the Lower Kittanning seam Beth Energy #33 mine and mine pool upon regional groundwater conditions proximal to the HDD site. The pool is currently pumped and treated by the Beth Energy’s successor, Pristine Resources. Please confirm the mine pool elevation associated with Mine #33 and revise the Report accordingly. Information on the mine pool elevation is available from either Larry Neff of Pristine Resources or the DEP Cambria Mining Office. The Report submitted to the DEP reveals that the low point elevation for the 20-inch HDD bore at an elevation of 1562 MSL, will encounter the mine pool. This intersection is unacceptable.
4. Please show the location of the Mariner East I pipeline on the profiles.

5. DEP provided feedback to SPLP on the Report prior to formal submission. DEP provided the following comment:

“In the geologic report, the discussion of the alluvial unconsolidated sediment beneath the North Branch Little Conemaugh River is stated to range from 1 to 150 feet. Given this statement, and that none of the shallow borings were truly located in the middle of the valley, additional drilling to determine the thickness of such deposits in the stream valley along the profile should be completed. It appears that drilling in the middle of the valley to assess depth to rock and condition of such bedrock in the middle of the valley at HDD profile depth may be done without perforating the path of the HDD.”

As part of the formal submission of the Report, this comment was not addressed. Instead the paragraph was simply removed from the Report currently under review. Given that this statement was based upon a published geologic report, (Wagner, et. at, 1975), removing this information without presenting site specific data to confirm or deny the conclusion is unacceptable. SPLP should complete the additional drilling as requested.

If you have any questions regarding the matter, please contact me at 412.442.4149, or by email at dadrake@pa.gov.

Sincerely,



Dana Drake, P.E.
Environmental Program Manager
Waterways and Wetlands Program

cc: Larry Gremminger, Gremminger & Associates, Inc. – via email