



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest Regional Office

December 17, 2018

Mr. Larry Gremminger
Sunoco Logistics, L.P.
535 Fritztown Road
Sinking Spring, Pennsylvania 19608

RE: Hydrogeological Re-Evaluation Report
HDD S2-0010, E65-973
Loyalhanna Lake Crossing
Loyalhanna Township, Westmoreland County

Dear Mr. Gremminger:

The Department (DEP) is requesting more information related to the HDD Analysis for the S2-0010 posted on the DEP Mariner East II pipeline portal webpage on August 17, 2018.

1. SPLP identifies two private water supplies within 450 feet of the HDD, WL-10242015-520-01 and WL-04272017-499-02, and states that the upper portions of the production intervals of these wells could intersect the elevation of the HDD profile. SPLP further states in Section 3.1.2 that drilling fluids appeared in these two wells during drilling of the 20-inch line.

Regarding potential impacts to these water supplies, SPLP simply states, "keep in mind that these wells are approximately located 321 and 396 feet from the HDD." In Section 4.1, SPLP further states it believes a large portion of the fluid in the pore space will have cured since drilling. Nonetheless, some portions may be in a fluid state, which may impact the water supply if there are any losses of circulation during drilling of the 16-inch line.

SPLP states that property owners within 450 feet of the alignment were offered temporary water but declined. However, SPLP does not elaborate upon the measures it will employ to address those potential impacts in an acceptable manner. SPLP must address those potential impacts in an acceptable manner.

As part of this re-evaluation, and in advance of commencing the HDD, SPLP has the option to enter into written agreements with all private water supply owners whose water supplies may be impacted by this Drill, regardless of their location. Under the agreements, SPLP must address short and long-term replacement of potable water supplies adequate in quantity and quality for the purposes served, to the satisfaction of each potentially affected water supply owners. The agreements should provide for SPLP to conduct water quality and quantity testing of each potentially affected water supply

prior to, during, and after the HDD activities. SPLP needs to provide proof of these agreements to the DEP with a response to this letter.

In the alternative, if SPLP chooses not to pursue these agreements with the private water supply owners, it must provide a discussion of actions to be taken by SPLP to prevent water supply impacts from occurring. SPLP needs to demonstrate how, in the absence of the agreements described above, SPLP will avoid impacts to all water supplies. SPLP's approach should include the utilization of technical and non-technical measures to avoid and minimize such impacts, including, but not limited to, the conversion of the HDD to a trench installation, use of other trenchless construction methods, the use of American Standards Institute/National Sanitation Foundation (ANSI/NSF) Standard 60 approved gels or other approved additives that could prevent such impacts from the Drill, or some combination of the above. To the extent that SPLP proposes to use any ANSI/NSF 60 certified HDD additives, consistent with Special Condition H.5 contained in DEP Permit No. 65-973, SPLP will need to demonstrate that the manner in which SPLP anticipates using each additive is consistent with the manner indicated in the ANSI/NSF Standard 60 certification for that additive. In addition, SPLP should state whether it will be following all conditions included as part of the additive's certification or, if not, provide an explanation for any deviation(s) from the certification and why that deviation is necessary and acceptable.

2. During the public comment period, the Department received correspondence from counsel for the owner of well WL-08172017-499-01 stating that they requested SPLP to drill a replacement well. This well is shown to be 776 feet from the HDD.

In Section 2.3.5, SPLP states that the affected water supply owner has been on temporary water supply since the water supply was affected by drilling fluid during the installation of the 20-inch line. Given that the installation of the 20-inch line was completed in July of 2017, it is unclear why a temporary water supply has been necessary since that time. Please provide information related to SPLP's plans to address the impacted private water supply identified as WL-08172017-499-01.

3. In Section 3.1.2, SPLP mentions the potential existence of a quarry high wall just west of the eastern entry/exit pit that may have contributed to the inadvertent returns (IRs) during installation of the 20-inch line. What level of investigation was conducted by SPLP to confirm the existence of the high wall and to understand its history? Please identify the location of the highwall as it relates to the locations of the IRs that occurred during installation of the 20-inch line.
4. In response to IRs that occurred during installation of the 20-inch line, it states in Section 3.1.2 that a vertical relief boring was installed to capture the lost returns which was highly effective in stopping all of the IRs. Given the success of the relief bore during drilling of the 20-inch line, SPLP should consider the feasibility of using a relief bore as a preemptive measure to reduce the risk of IRs occurring during installation of the 16-inch line.

Upon receipt, DEP will post requested additional information on the DEP pipeline portal webpage for public comment. The public will have 5 additional business days from the date of posting on the website to provide DEP any additional comment.

Mr. Gremminger

December 17, 2018

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

Sincerely,

A handwritten signature in cursive script that reads "Dana Drake".

Dana Drake, P.E.

Environmental Program Manager

Waterways & Wetlands Program

cc: Chris Embry, SPLP – via email
Jessica Kane, WCD – via email

