



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest Regional Office

March 16, 2018

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

RE: Hydrogeological Re-Evaluation Report
Permit No. E65-973
Norfolk Southern Railroad Crossing (S1B-0250)
Penn Borough, Jeannette and Hempfield Townships, Westmoreland County

Dear Mr. Gordon:

The Department of Environmental Protection (DEP) has reviewed the supplemental Horizontal Directions Drill (HDD) analysis submitted for S1B-0250, E65-973 posted on the DEP Mariner East II pipeline portal webpage on March 2, 2018. DEP received responses from Sunoco Logistics L.P. (SPLP) to our December 4, 2017 and January 29, 2018 comment letters on December 29, 2017 and March 1, 2018 respectively. DEP also received and reviewed public comments submitted jointly by Clean Air Council, Mountain Watershed Association, and Delaware Riverkeeper Network to these SPLP submissions. In response to comments received, DEP undertook further evaluation and concluded that the potential risks to water supplies were adequately considered.

DEP acknowledges the incorporation of the following best management practices noted in your report that SPLP will follow:

1. SPLP will mandate and enforce annular pressure monitoring during the drilling of the pilot hole, which assists in immediate identification of pressure changes indicative of loss of return flows or over pressurization of the annulus, managing development pressures that can induce an IR;
2. SPLP inspectors will ensure that an appropriate diameter pilot tool, relative to the diameter of the drilling pipe, is used to ensure adequate "annulus spacing" around the drilling pipe exits to allow good return flows during the pilot drilling;
3. SPLP will mandate short-tripping of the drilling tools to ensure an open annulus is maintained to manage the potential inducement of IRs;
4. Required monitoring of the drilling fluid viscosity, such that fissures and fractures in the subsurface are sealed during the drilling process;
5. During the reaming phase, the use of Loss Control Materials can be implemented if indications of a potential IR are noted or an IR is observed:

6. If LCMS prove ineffective to mitigate loss of returns or IRs, then grouting of the pilot hole may be implemented;
7. If necessary, the pilot hole and reaming phases of the HDD may utilize casing, hammered into the substrate down to structurally better rock, to prevent lateral movement of drilling fluids.

Considering the aforementioned, the supplemental information is adequate. You should contact the Westmoreland Conservation District regarding a red line field change of any revised drill pit location within the limit of disturbance. You may proceed with the permitted activity in the manner proposed in your reevaluation and in accordance with all applicable permit terms and conditions.

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
Waterway & Wetlands Program

cc: Westmoreland Conservation District – via email