

DEP Permit # E21-449
DEP Permit HDD Reference # PA-CU-0062.0000-WX-16
DEP HDD # S2-0170
Township – Lower Frankford
County - Cumberland
HDD Site Name – Graham Creek Crossing

2nd Public Comment Period

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1. Comment

On April 30, 2019, Sunoco submitted a letter to the Department in response to the Department’s request for additional information regarding horizontal directional drilling (“HDD”) Site PA-CU-0062.0000-WX-16 (the “Site”). 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”), we respectfully submit these comments in reply. We address each point in Sunoco’s letter under the same item number here. In short, Sunoco’s responses simply do not answer the questions posed.

1. Justification of the proposed bore path

The Department reasonably asked for information justifying why Sunoco proposed to make the specific changes set forth in the Re-evaluation Report. Sunoco provides some information, but frustratingly fails to present a straightforward answer, and

instead spends four paragraphs of its six-paragraph response listing information it used to come up with that proposal. That is all well and good, but how that information led to Sunoco's proposal remains obscure.

A clearer answer could state that the depth in question was selected because greater depths could not be done for a certain reason, and lesser depths were problematic for another reason. The endpoints were optimal because they allowed a certain benefit, and others did not allow such benefit. And so forth. It would not be hard to write.

Instead, Sunoco uses non-specific, all-purpose language touting an "increased depth" without explaining the purpose of the specific depth, and increased entry and exit angles without justifying the specific angles. The result is many words with little enlightenment, an unfortunate par for the course for Sunoco. If there is a reasonable justification for the proposal Sunoco selected, it should have no trouble articulating it. The explanation provided, however, is what one would expect when there is no justification to give.

2. Interception of fractures

Sunoco's response to the Department's Item 2 does not make sense. Sunoco writes in full: "Based upon the 2017 geotechnical core data, the pilot and reaming tools will intercept fractured, weathered, and broken layers within the bedrock until approximately 130 ft. of depth below the land surface is achieved. As discussed in the response to Item 1 above, the horizontal run is set at a general depth of 126 ft. below ground, which provides for a minimum of 20 ft. of competent rock above the profile to mitigate the potential for IRs to occur." (Emphasis added).

20 feet above 126 feet bgs is 106 feet bgs, not 130 feet bgs. Sunoco's response suggests that it has selected a depth for the 16-inch pipe that keeps it just outside the zone of competent rock rather than safely within it. If Sunoco's statement is accurate, this proposal revised drill plan should not be approved.

As a minor note, Sunoco writes that the depth of the horizontal run was "discussed in the response to Item 1 above." It would have been helpful to have been discussed, but it was not.

3. Overburden strength

The Department requested information on overburden strength as required in the Order. Sunoco's response does not contain that information. Sunoco provides qualitative information on density and consistency of the overburden material, as opposed to strength of the overburden as a structure. This is simply non-responsive.

4. Pipe stress allowances

Unfortunately, Sunoco's response again does not answer the question the Department asked. The Department asked for "further explanation of how the following statement [on pipe stress allowances] applies to this HDD re-evaluation." (Emphasis added). Sunoco spends most of a page describing in general terms the theory of pipe stress allowance in pipeline design without mentioning this HDD re-evaluation. Then it appends a pro forma statement that could apply to literally any of its HDD re-evaluations: "All of the information and the stress assessment procedures above are incorporated into the profile design and implemented in analysis of the drilling profile to ensure the integrity of the pipeline as installed." How so? Sunoco does not explain.

Literally none of the information Sunoco provides is specific to this HDD re-evaluation. Sunoco could easily have answered the Department's question rather than disrespect the Department with another boilerplate response.

Sunoco's letter written in response to the Department's inquiries does not actually answer the questions posed. Sunoco has not yet met its obligations under the Order, nor has it provided needed information to evaluate the reasonableness of its proposed re-design. (1-5)

Letter – [Clean Air Council – 5-3-19 – Graham Creek Crossing](#)