

March 19, 2019

Mr. Matthew Gordon
Sunoco Pipeline, L.P.
535 Fritztown Road
Sinking Spring, PA 19608

Re: Hydrogeological HDD Re-Evaluation Report
Locust Cr./Graham Cr. 16" Horizontal Directional Drill Location (S2-0170-16)
Permit No. E21-449
Lower Frankford Township, Cumberland County

Dear Mr. Gordon:

The Pennsylvania Department of Environmental Protection (DEP) is requesting more information from Sunoco Pipeline, L.P. (SPLP) related to the HDD Re-Evaluation for the Graham Cr./Locust Cr. HDD site, HDD# S2-0170-16 and permitted under Permit E21-449, posted on the DEP Mariner East II pipeline portal webpage on February 11, 2019.

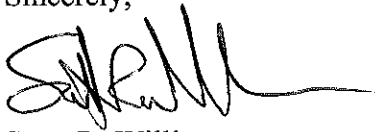
1. As the re-evaluation report acknowledges, two of the IR's occurred in water resources that are in close proximity to the entry and exit pits during HDD activities for the 20-inch pipeline. We request that SPLP further develops the discussion within the re-evaluation about how the relatively minor increase in HDD profile length and depth in the re-designed, proposed 16-inch bore path will act to minimize the potential for IR's to the water resources adjacent to the proposed entry and exit pit locations.
2. Relating to the consideration of geologic strength at profile depth: The geologic report refers to core borings at two locations near the HDD profile. The geologic report is limited in interpretation/discussion of the core samples in relation to geologic strength at profile depth. RQD ranges are listed along with descriptions stating that bedrock is highly weathered and broken. The report does not utilize core sample data in interpreting the likelihood of intercepting fractures during drilling activities. Please provide further discussion about how the use of this information was considered as part of the re-evaluation and selection of the 16" pipeline bore path.
3. Relating to the consideration of Overburden Strength Analysis: The geologic report provides a description of soils underlying the site but does not include any analysis or discussion of the overburden strength. Please provide additional information/discussion to address the consideration of overburden strength analysis as per the requirements of paragraph 4 ii of the EHB corrected and stipulated order.

4. Relating to the consideration of Pipe Stress Radius: Provide further explanation of how the following statement applies to this HDD re-evaluation: "Pipe stress allowances are an integral part of the design calculations performed for each HDD."

Upon receipt, DEP will post SPLP's response to this letter 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.

If you have any questions or would like to discuss this letter, please contact me at scwilliams@pa.gov or 717.705.4799.

Sincerely,



Scott R. Williamson
Program Manager
Waterways & Wetlands Program

cc: Larry Gremminger, Energy Transfer Partners/Sunoco Pipeline, L.P. (pdf copy)
Monica Styles, Sunoco Pipeline, L.P. (pdf copy)
Doug Hess, P.G., Skelly and Loy
Matt Stough, Cumberland County Conservation District (pdf copy)