

DEP Permit # E21-449
DEP Permit HDD Reference # PA-CU-0136.0003-RD-16
DEP HDD # S2-0220
Township – Middlesex
County - Cumberland
HDD Site Name – I-81 Road Crossing

4th Public Comment Period

Commentator ID #	Name and Address	Affiliation
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1. Comment

On November 15, 2019, the Department requested additional information from Sunoco regarding its reevaluation (Report) of the horizontal directional drilling (HDD) indicated by drawing number HDD PA-CU-0136.0003-RD-16 (the Site). Sunoco responded by letter dated December 10, 2019 (December Response), supplementing the Report. 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), please accept these comments regarding the Department’s request and the December Response.

Given Sunoco’s lack of response to the Department’s paragraph number 1, Appellants are concerned that Sunoco and the Department are implicitly agreeing that the drill in question will create further spills at the location of the earlier IRs. As a reminder, that is an Exceptional Value wetland and along Stream S-I47, an HQ-CWF unnamed tributary to Letort Spring Run. This is unacceptable; Sunoco does not have a permit to discharge industrial waste into the wetland or stream.

Appellants also believe that Sunoco is misunderstanding the Department's comment in paragraph number 3. Sunoco appears to be construing the comment as a concern about whether it is possible to locate the drill bit at all and responds that it is certainly possible to locate the drill bit. Appellants understand the Department's concern to be over issues relating to steering and tracking the drill bit in real time. Steering has been a recurring issue at several locations along the Mariner East 2 route. Sunoco needs to be able to track the drill bit accurately and respond in real time when it gets off track. Given that the drilling has gone off-track on occasion despite Sunoco implementing standard tracking practices, the Department should ask Sunoco to respond with more than just a recitation of its standard practices.

(1-5)

Letter – [Clean Air Council – 12-16-19 – I-81 Road Crossing](#)