

March 19, 2019

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

Re: Hydrogeological HDD Re-Evaluation Report
LeTort Spring Run 16" Horizontal Directional Drill Location (S2-0210-16)
Permit No. E21-449
Middlesex 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 LeTort Spring Run Crossing, HDD # S2-0210 and permitted under E21-449, posted on the DEP Mariner East II pipeline portal webpage on February 1, 2019.

1. As required by Paragraph 4 and 5 of the Environmental Hearing Board's August 10, 2017 Corrected Stipulated Order, SPLP failed to fully utilize information gathered during the HDD of the 20-inch bore as part of the HDD Re-evaluation for the 16-inch pipeline. Many small inadvertent returns occurred during the HDD activities for the 20-inch bore. Please gather geologic and drilling information collected by various site personnel during the 20-inch bore which can be used to synthesize a comprehensive history of each or groupings of events. The HDD re-evaluation report should discuss the operational or geologic cause of each inadvertent return, the magnitude of the inadvertent return(s) and associated loss of circulation, the best management practice used to contain and minimize the inadvertent return, and the drilling procedure or technique used to progress the boring.

This information should then be used to describe why the chosen bore path for the 16-inch pipeline was determined and how such information has been used to minimize the potential for IR's to occur. Also, as part of the discussion of construction alternatives, include why HDD activity is still the preferred and chosen methodology for pipeline construction at this location.

2. Once the items discussed above are developed, please discuss any operational provisions or changes proposed for the intervals where the previous inadvertent returns occurred. Also, discuss any drilling intervals along the proposed 16-inch drill path where increased vigilance may be warranted, i.e.: the P.G. working in concert with the HDD contractor as sensitive geologic zones are approached by the drill bit.
3. In the re-evaluation report, please further discuss the site's standard operating procedures that are implemented upon the loss of circulation with special emphasis on how these provisions will minimize the occurrence and magnitude of an inadvertent return.

4. 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."
5. Please correct the inconsistency between the Entry/Exit Angles in the narrative and final profile drawings.

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