

DEP Permit # E07-459
DEP Permit HDD Reference # PA-BL-0001.0031-RD-16
DEP HDD # S2-0109
Township – Blair
County - Blair
HDD Site Name – Old US 220 Highway Crossing

1st Public Comment Period

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1. Comment

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 on Sunoco Pipeline L.P.’s (“Sunoco”) re-evaluation report (“Report”) for the horizontal directional drilling (“HDD”) indicated by drawing number PA-BL-0001.0031-RD-16 (the “HDD Site”).

1. It is entirely unclear whether Sunoco is proposing a revised HDD or a “Direct Pipe Bore/open cut construction plan.”

While Sunoco provides plans in the Report for a revised HDD, it also refers in multiple places to the use of “Direct Pipe.” Specifically, the Report on unnumbered page 3 states: “Although the temporary impacts would be controlled and managed using these appropriate mitigation measures, the preferred method is to Direct Pipe Bore below these resources.” Next, on unnumbered page 4, it states: “The Direct

Pipe Bore/open cut construction plan is co-located within the existing SPLP 20-inch diameter pipeline ROW and rerouting would cause new greenfield impacts.”

While Sunoco provides plans in the Report for a revised HDD, it also refers in multiple places to the use of “Direct Pipe.” Specifically, the Report on unnumbered page 3 states: “Although the temporary impacts would be controlled and managed using these appropriate mitigation measures, the preferred method is to Direct Pipe Bore below these resources.” Next, on unnumbered page 4, it states: “The Direct Pipe Bore/open cut construction plan is co-located within the existing SPLP 20-inch diameter pipeline ROW and rerouting would cause new greenfield impacts.” It is entirely unclear whether Sunoco is proposing to use a revised HDD or a “Direct Pipe” and open cut. If “Direct Pipe” is being proposed, possibly along with open cut, all the details about this proposal are missing from the Report.

The Report does not even explain what “Direct Pipe” is. “Direct Pipe” is not listed in Sunoco’s supposedly comprehensive list of “any method of trenchless pipeline construction techniques that have been used or will be used in the completion of the Project.” See Trenchless Construction Methodologies, http://files.dep.state.pa.us/ProgramIntegration/PA%20Pipeline%20Portal/MarinerEastII/Summary_of_Order/Para%202%20-%20Exhibit%20A%20-%20Trenchless%20Construction%20Methodologies.pdf. Appellants presume Sunoco is referring to what Mears HDD has a registered trademark for, Direct Pipe®, see <http://mearshdd.net/hdd/direct-pipe/>. Regardless, the Department should have a conversation with Sunoco about the use of this technique, which as far as Appellants are aware has not previously been authorized by nor disclosed to the Department.

Based on the curious inclusion of these “Direct Pipe” references, Appellants suspect that there was a draft of the Report in which Sunoco was planning on using “Direct Pipe,” possibly with open cut, in place of the revised HDD. If so, the possibility should have been discussed in the Alternatives Analysis and compared with the revised HDD option. In its PA-CA-0091.0016- RD-16 HDD re-evaluation report, Sunoco wrote, a “direct pipe installation is also a practical means of pipeline installation that can avoid the occurrence of IRs. However, a direct pipe installation bore installation is limited to 750 ft in extent, and this is well under the total length of regulated and protected resources at this HDD location.” That is not the case here.

Whether Sunoco is actually proposing “Direct Pipe” here, or it merely failed to provide a complete alternatives analysis, the Department, Appellants, and the public do not have the full picture to evaluate whether Sunoco’s proposal should be approved. The Department must require Sunoco to provide a revised Report that contains Sunoco’s full proposal, complete with an alternatives analysis that considers all plausible alternatives.

2. The Alternatives Analysis fails to discuss colocation in an existing adjacent utility right-of-way.

An additional problem exists with the Report's Alternatives Analysis. A high-voltage electrical tower right-of-way exists parallel to the proposed 16-inch HDD and slightly to the south of it. Sunoco's alternatives analysis notes its existence but does not discuss the possibility of using the same right-of-way as an alternative to this Site. The note in the alternatives analysis of the Report reads: "Shifting the line south parallel to an existing utility easement would transect the same forested woodlands and wetlands transected by the proposed route and result in impacts to additional wetlands (W-BB47 and W-L60) and streams (S-L82 and S-L81)." However, using the existing utility easement would avoid impacts to any forested wetlands.

Perhaps the electrical utility would not want a pipeline using its right-of-way for more than a crossing, and that is why Sunoco does not want to use that easement. However, all we can do is speculate, because Sunoco fails to discuss at all the possibility. The Department should require an explanation from Sunoco before concluding that that alternative is not appropriate.

Conclusion

As explained above, the Report is incomplete. The Department must not approve the proposal at this stage, without a complete Report for it and the public to evaluate. Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site. (1-5)

Letter – [Clean Air Council – Old US 220 Highway Crossing – 2-27-19](#)