

May 4, 2020



By Email

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Re: Sunoco's submission of previously undisclosed geophysical survey results for HDD PA-CH-0124.0000-RD (HDD# S3-0310)

Dear Mr. Hohenstein,

On March 5, 2020, Sunoco submitted a limited response to the Department's inquiry regarding its reevaluation ("Report") of the horizontal directional drilling ("HDD") indicated by drawing number PA-CH-0124.0000-RD (the "Site"). In that response, Sunoco refused to make public the results of geophysical surveying for the Site. The geophysical results have now been made public. 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 geophysical survey results.

1. The geophysical survey results have not been incorporated into the Report.

Over years of violations and construction failures that have necessitated reevaluations of its drillings sites, Sunoco has established a pattern of refusing to gather needed information, being forced by the Department to conduct surveys or other testing, and then failing to actually incorporate the results into its plans. Here, we see the same dangerous pattern again. Sunoco has conducted geophysical surveying of the Site but has not used the survey results to improve or even inform its plans. Making the geophysical survey results public was an important and necessary step, but it is nowhere near sufficient. If Sunoco does not actually apply the findings of the surveys to its plans, the surveys are of little value. The Department must not approve the Report until it fully accounts for the results of geophysical surveying.

2. The geophysical surveys do not cover the correct area.

Any geophysical surveys in the vicinity of Sunoco's proposed drilling alignments represent some improvement over Sunoco's preferred approach of proceeding with minimal investigation. Here, the use of multiple geophysical survey methods was the right approach so data could be compared and corroborated. Unfortunately though, the surveys were all concentrated over the area of the existing 16-inch line and do not cover the area that Sunoco wants to drill through to install the 20-inch line. Thus, while the geophysical surveys might give a better picture of the

geology in the area in a general sense, they do nothing to identify the locations of potential voids or other anomalies that might be encountered when installing the 20-inch line. This reevaluation process is about improving the safety of plans for installing the 20-inch line, and yet all of the figures in the geophysical survey results clearly show that the data collected fail to extend to proposed 20-inch alignment. This is unacceptable and a missed opportunity to avoid another dangerous sinkhole. Sunoco was already responsible for creating a massive sinkhole at this very site while installing the previous line. It is crucial that construction of the 20-inch line not proceed without full information and mitigation plans. That means conducting geophysical surveys in the area where Sunoco actually intends to drill.

3. Additional drilling may pose a risk to the 16-inch line.

The geophysical survey results show that the geology around the 16-inch line remains vulnerable. The Report surmises that heavy rainfall and vibration from its drilling contributed to the sinkhole that erupted while constructing the 16-inch line. Those risk factors remain. We can reasonably anticipate more rain this time around and there will necessarily be vibrations from drilling the 20-inch line. While we do not know exactly what underlies the proposed 20-inch alignment because Sunoco has inappropriately limited the scope of its surveys, the surveys do show that anomalies exist around the 16-inch line. Sunoco has not demonstrated that construction of the 20-inch line will not further disrupt the geology around the 16-inch line. Sunoco’s geophysics consultants recommend an area of low gravity on the 16-inch alignment “be inspected by the geotechnical engineer or geologist of record to check for signs of earth movement or excessive infiltration.” Sunoco has given no indication that it will follow this recommendation. It would be reckless not to. If construction of 20-inch line activates fractures or voids along the 20-inch alignment, this could trigger groundwater or drilling fluid to move in unexpected ways, causing flooding or inadvertent returns. Even worse, there could be a new subsidence event that could threaten the integrity of the 16-inch line.

Thus, in addition to extending geophysical surveys to cover the area where construction will actually take place and incorporating results of all surveys into the Report to make the construction plans safer, Sunoco must also use the current geophysical survey results to ensure that further construction will not cause problems along the 16-inch alignment.

Thank you for considering these comments. Please keep Appellants apprised of any next steps.

Sincerely,

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