

DEP Permit # E07-459
DEP Permit HDD Reference # PA-BL-0122.0000-WX
DEP HDD # S2-0140
Township - Frankstown
County - Blair
HDD Site Name – Frankstown Branch Juniata River Crossing

1st Public Comment Period

Commentator ID #	Name and Address	Affiliation
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1. Comment:

My name is Anastasia (Brown) Frank and I have a few comments/questions regarding the letter I received about the HDD of the Juniata River that is planned by Sunoco for the PPP on Juniata Valley Road in Hollidaysburg, PA. My entire neighborhood is concerned about the safety of our drinking water along with the possibility of damage to our well structures and/or total water loss due to the HDD.

1. Sunoco drew water samples from our well a few weeks ago. I received the results 2 weeks ago. I am questioning why they chose to test for the following VOC's. Did the DEP require this testing prior to the HDD?
 - TolueneD8
 - Dibromofluoromethane
 - a,a,a,Trifluorotoluene
 - 4-Bromofluorobenzene

These types of chemicals are typically found in water supplies located next to commercial or industrial businesses that use products such as petroleum, solvents, pesticides, paint thinners, etc. With our rural location and no businesses of this type located anywhere near our wells, what determined the testing of these particular VOC's?

2. How often will Sunoco be required to retest our private well water supplies during and after the initial HDD process? Is there a planned period of time that Sunoco will be monitoring our well/water supplies for the detection of harmful substances which could take years to contaminate ground water?
3. Will Sunoco retest and check the stability of our well structures/water supplies during and after a suspected/known IR?
4. How will we be notified if Sunoco contractors suspect possible damage/contamination to our well structures/water supplies? And who can we notify at Sunoco if we suspect contamination or damage to our well systems? Will there be local representation for other departments like DEP that we can turn to if we suspect something is amiss?
5. If an incident, such as an IR, would occur, what measures will Sunoco take to guarantee that we have clean drinking water and sustainable wells?

I appreciate any information you can provide in answer to my questions/concerns. I am hoping that the PADEP will be closely monitoring the HDD by Sunoco and is prepared to protect homeowners who may be affected now and in the future from any harm that the pipeline may bring. Thank you for taking the time to read my email and I look forward to hearing from you. (1)

2. Comment:

Pursuant to the Corrected Stipulated Order entered on EHB Docket No. 2017-009-L on August 10, 2017 ("Settlement"), 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 numbers HDD PA-BL-0122.0000-WX & PA-BL-0122.0000-WX-16 (the "HDD Site").

The Department's Review

Pennsylvanians rely on the Department of Environmental Protection to protect them from dangerous activities that threaten their air, water, land, and health. The Department has recognized that the construction of Mariner East 2 has done damage to the public already. The purpose of Sunoco's re-evaluations of certain HDD sites is so that it does a better job avoiding harm to the public and the environment in its

HDD construction. The Department's role is to review and assess Sunoco's Report before deciding what action to take on it.

It is the Department's duty to review and assess the Report with protecting the public and the environment placed first and foremost. Looking at the individual circumstances at the site in question is key. Critically important is accounting for input from those who live nearby, who have a deeper connection with and greater knowledge about the land than the foreign company building the pipelines through it.

A meaningful, objective and substantive review and assessment by the Department will ensure that new or further HDD operations at the re-evaluated sites will cause minimal, if any, harm to the public and the environment. Anything less than a full, careful, and objective review would endanger the public and the environment. Pennsylvanians place their trust in the Department to do a thorough, science-based assessment, taking into account these and other comments, and approving Sunoco's recommendation only if it would protect the public and the environment from any further harm.

Comments on HDD PA-BL-0122.0000-WX & PA-BL-0122.0000-WX-16

1. HDD is inappropriate because of the high risk of inadvertent returns into waters of the Commonwealth.

Sunoco has implemented a number of changes to reduce the risk of inadvertent returns at these drill sites, including changing the angle of entry and exit, increasing the depth of drilling, and utilizing casing. Despite these improvements though, drilling at these sites continues to pose a high risk of inadvertent returns. Sunoco recognizes that even the casing procedure itself is "likely" to result in an inadvertent return into Stream M32. The crossing of the Juniata River is also noted in the report as one of the weakest points of the profile. Where even Sunoco's re-engineering of the drilling plans cannot prevent spills of drilling fluid into surface waters, it is apparent that the geology at this location is not suitable for horizontal directional drilling.

Similarly, the geology and topography of this site mean that drilling could lead to discharge of contaminated groundwater, further jeopardizing surface waters, and resulting in impacts to groundwater that have not been explored. Sunoco notes that the substantial difference in elevation between the entry and exit points of these drill sites could result in flowback of "significant quantities" of groundwater. To control these returns, Sunoco intends to use water filtration structures to filter the water before discharging it. Later in the Report, however, when discussing its filtration systems in the context of the alternatives analysis, Sunoco explains the limitations of these systems: "the current feasible filtration ability does not exceed 50 microns; therefore, cloudy water (from suspended fine clay and silt particles) would be discharged downstream regardless of all control methods employed for the entire duration of this crossing until completion." Thus, the substantial quantities of

groundwater that would need to be filtered as a result of the drilling can also be expected to contain suspended clay and silt particles when they are discharged. Where those discharges will happen and what their impact on surface waters will be is not addressed.

2. Re-Route Analysis

Sunoco has not adequately considered a re-route alternative. While Appellants agree that a minor re-route constrained to the survey areas Sunoco considered is unlikely to be a significant improvement over current plans, it is notable that the Frankstown Branch of the Juniata River could be avoided all together with a more substantial re-route. In fact, the current route through central Blair County almost appears to go out of its way to cut northward, crossing the Juniata River twice, before returning to a more southerly route. Given Sunoco's inability to adequately mitigate the risks to water resources associated with drilling at this site, it is especially important to fully consider re-reroute alternatives. Sunoco's single paragraph of re-route analysis, which fails to contemplate routes outside the immediate vicinity of its current plans, is insufficient.

3. Sunoco has failed to assess risks to water supplies.

Throughout the re-evaluation process, Sunoco has consistently failed to analyze risks to water supplies. In this Report, Sunoco has taken an important step in the right direction by having actually spoken to landowners about the locations of their private wells. Unfortunately though, the information gathered from landowners was not utilized to provide an analysis of risks to water supplies and does not even appear to have been shared with Sunoco's geology experts.

Sunoco describes having made contact with five landowners whose private drinking water supplies are within 450 feet of the HDD sites. The landowners reportedly did not know the depth of their wells and Sunoco made no further efforts to get that information. Rettew's discussion of site geology identifies only two wells within 0.5 miles of the HDD sites based on data from PaGWIS, a system which is known to be inaccurate and incomplete. Rettew's report wholly fails to recognize or incorporate the wells identified by Sunoco and nowhere in the report are the actual locations of those wells provided. Separate from Rettew's discussion, Sunoco describes the general direction of some of the wells as being to the northwest of the drill sites. This is especially concerning as Rettew has determined the "primary groundwater flow is down dip and to the northwest."

Despite the contradictions and the incompleteness of the Report, one thing is clear: there are several private drinking water wells within close proximity to the drill sites. It is critical that Sunoco provide an analysis of well production zones for these wells and risks to these wells, as the Corrected Stipulated Order requires.

4. It is not clear that the drilling techniques discussed in the conclusion are an improvement on earlier practices.

In the conclusion of the Report, Sunoco recites a series of drilling practices and procedures that it says it “will employ.” This is an improvement on the language in previous re-evaluation reports indicating those measures “may” be implemented. However, with the exception of the addition of casing, it is not clear whether these are new and/or improved measures. Notably, Sunoco does not actually say that these measures are new, or were not employed during its earlier, problematic phase of HDD across the Commonwealth.

This is not to assail the use of improved drilling practices, if Sunoco is implementing any. But this recitation without more does not provide assurance that the use of HDD here will be safe.

Conclusion

For these reasons, Appellants maintain that horizontal directional drilling at this location is inappropriate and request that the Department not approve the HDD re-evaluation recommendation.

Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site. (2-6)

Letter – [Clean Air Council – 11-10-17 – Frankstown Branch Juniata River Crossing](#)