

**DEP Permit # E07-459**  
**DEP Permit HDD Reference # PA-BL-0126.0000-RD**  
**DEP HDD # S2-0142**  
**Township – Woodbury**  
**County – Blair**  
**HDD Site Name – Piney Creek Crossing**

**3<sup>rd</sup> Public Comment Period**

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**1. Comment**

On June 7, 2018, Sunoco submitted a letter to the Department in response to the Department’s April 19, 2018 request for additional information regarding horizontal directional drilling (“HDD”) sites HDD PA-BL-0126.0000-RD & PA-BL-0126.0000-RD-16 (the “Site”). 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”), we respectfully submit these comments in reply.

In response to the Department’s letter, Sunoco generated new HDD plan and profiles for the Site, and new annular pressure calculations. This was intended to respond, in part, to the Department’s point that “[t]here are many discrepancies between the stationing and elevations on the revised plan/profile maps and the APC/FPC curves and soil profiles, and even among the various tables used to create each curve.” However, though Sunoco has added labeling, there are still discrepancies.

For example, according to the 20" profile view, the HDD exit and entry are at elevations of 1152 feet and 1130 feet. The soil profile in the APC/FPC chart for the 20" pipe and the Path Design Calculations, however, peg the exit at 1134 feet, and the entry at 1136 feet. Both are discrepant. The same problem exists with the 16" profile. The exit in the profile view is labeled as 1137 feet, and the entry at 1130 feet. In the soil profile in the APC/FPC chart and the Path Design Calculations for the 16" pipe has the entry at an elevation of 1123 feet and the exit at 1132 feet. Again, both are discrepant. As the old "garbage in, garbage out" saying suggests, the calculations Sunoco has presented are not reliable because the quality of the data going into them is still suspect.

Finally, the re-examined and re-evaluated calculations for annular pressure versus formation capacity still reveal unacceptable safety values. Four methods for this acceptability calculation are detailed in the revised Horizontal Directional Conceptual Drill Design: total stress (Method A), total stress plus strength (Method B), Delft equation (Method C), and the Queens equation (Method D). The Design document labels Method A the "traditional method." Method C, one of the two cavity expansion methods, admittedly has "shortcomings" and "indicates unconservative predictions." Method D, the other cavity expansion model, is designed to "address the shortcomings of [Method C]."

For the 20" pipe, the safety is not considered acceptable when calculated using Method D, and barely considered acceptable under Method A. For the 16" pipe, the safety is not considered acceptable when calculated using either Method A or Method D.

The Department should require Sunoco (1) to ensure that the data it is using is accurate and consistent, and (2) re-design the HDD such that its annular pressure is at an acceptable level of safety given the outside geological factors.

Thank you for considering these comments. Please keep us apprised of your next steps on this HDD Site. (1-5)

Letter – [Clean Air Council – 6-12-18 – Piney Creek Crossing](#)