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Senate of Pennsylvania  
November 20, 2017

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West Chester

Ms. Karyn Yordy  
Executive Assistant, Office of Programs  
Department of Environmental Protection  
Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101

Dear Ms. Yordy,

Please accept the following comments in response to the HDD Reevaluation Report submitted by Sunoco Pipeline, L.P. for DEP Permit number E15-862, HDD Reference number PA-CH-0219.0000 filed on November 3, 2017.

Following my review of this report, I have a number of significant concerns related to the stated environmental impacts and the potential for additional contamination of private wells in this area. This reevaluation report indicates that Sunoco utilized the PAGWIS system and sent certified letters to those landowners within 450 feet of the revised HDD alignment. This letter requests that the landowner contact the Right-of-Way agent if they have a private well on their property and if they would like to have their well sampled. The stipulated agreement and original permit approval for this project highlight the importance of protecting private groundwater resources. However, this project has already resulted in the contamination of over a dozen private wells in West Whiteland Township to date and I question if Sunoco is able to complete this project without permanently impacting additional wells. While the report indicates that Sunoco will initiate contact by phone or in person if they do not respond to the certified letter, I must ask what measure of accountability the Department has in place to ensure that this action is taken. Further, Sunoco indicates that when a private well is located, they will provide the landowner with alternative water supplies until HDD is complete. This indicates that Sunoco does not feel that they can complete this project without direct impacts to private water supplies - a fact that I find extremely concerning and one that certainly requires additional clarification.

The reevaluation also indicates that Sunoco plans to change previously approved HDD to open cut construction techniques. This modification will have significant environmental and quality-of-life disruptions for those who live and work in West Whiteland Township. The report indicates that open cut techniques will cross at least two tributaries to Valley Creek (an exceptional value waterway) and will result in direct impacts to a number of wetlands. Further, open cut construction will create significant disruption in a highly populated area. The proposed route encroaches within a few feet of homes, crosses a little league ball field, public library, and commercial centers. This modification will seriously impact the daily activities and quality of life for anyone along this route and, as such, I request that the Department host a public meeting to discuss these impacts with citizens prior to consideration or approval of such a change from HDD to open cut construction.

Finally, the HDD Hydrogeologic Revaluation Report provided by Groundwater & Environmental Services, Inc. (GES) dated October 16, 2017, clearly demonstrates that the information available is insufficient. In this report, GES explains that the proposed HDD route will traverse areas of known Karst formations, and that this type of rock formation is, "prone to sinkhole development and solution openings, and should be thoroughly investigated before construction." Further, GES states that, "The risk of losing drilling fluids, of IRs, of groundwater flowback discharges and of lowering of the local water table could not be assessed given the available information. Deeper cores, to the elevation of the planned lowest point and representative water level measurements are needed to assess those risks. A geophysical study is required to determine the extent of karst development along the profile, especially in light of installation challenges that are being experienced due south, including excessive groundwater discharge; loss of fluids, and difficulties steering the pilot hole."

Based on the expert analysis of hydrogeologists contracted by Sunoco, the information gathered is insufficient to comprehensively assess the environmental and property impacts. The Department should require such studies be completed before consideration. While Sunoco has gone through the motions of reevaluation, it is clear that the information provided is insufficient. It is my strong recommendation that the Department reject this report as incomplete and require Sunoco to perform complete impact evaluations to ensure construction activities does not cause permanent and irreparable harm to the environment and citizens in West Whiteland Township.

Sincerely,



Andrew E. Dinniman  
State Senator – 19<sup>th</sup> District