

DEP Permit # E21-449
DEP Permit HDD Reference # PA-CU-0203.0000-WX
DEP HDD # S2-0250
Township – Lower Allen
County - Cumberland
HDD Site Name – Yellow Breeches Creek Crossing

2nd Public Comment Period

Commentator ID #	Name and Address	Affiliation
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1. Comment:

On January 23, 2018 Sunoco submitted a letter to the Department in response to the Department’s requests for additional information regarding horizontal directional drilling (“HDD”) Sites PA-CU-0203.0000-WX & PA-CU-0203.0000-WX-16. 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.

Appellants believe that revisions to the reevaluation report are an improvement, but the plans still lack critical information.

In its December 19, 2017 letter to Sunoco, the Department raised its concerns regarding groundwater flow back at the site and requested additional information and updated plans to ensure groundwater would be properly managed. Appellants support this request and believe the information requested by the Department is needed to protect the public and natural resources.

An effective plan for managing the groundwater disrupted at the site necessarily must be based on site-specific groundwater data. Here, Sunoco has indicated that no table water mapping was available. Nevertheless, despite not being able to rely on existing data, Sunoco has still not performed any groundwater modeling. Instead it is proposing to implement typical groundwater management practices that may not be appropriate and adequate for this site.

Understanding the amount of groundwater that may surface due to Sunoco's construction is important for determining the impacts of that disruption, both to the water table and connected water supplies, and to the surface. Sunoco plans to discharge filtered groundwater to the land surface at the edge of the temporary work space. Discharging a significant amount of water could result in erosion of the surface and sediment flowing into the streams and wetland at the site. The plans do not account for these impacts. The extent to which the production of groundwater at the site may result in impacts to water supplies and the recharge of the wetland is also unclear.

Furthermore, Note 4 for the typical "Filter Bag Detail Use in Hay Bale Discharge Structure [sic]" explains that the structure will be located "such that it drains to a well-vegetated area with slopes between 1% and 5% toward the receiving water body." Here, the proposed location of the straw bale HDD water dewatering structure is located on a slope with a change in elevation greater than two feet over its 25-foot width, which is thus at least an 8% slope. This location is too steep and will cause an excessive potential for erosion and sedimentation into the receiving UNT to Yellow Breeches Creek. The slope is gentler to the west or southwest, which would be preferable places to locate the structure.

Appellants urge the Department to require Sunoco to provide a scientific basis for its preferred groundwater control methods to ensure they are adequate for this site. Sunoco should also be required to fully analyze and address the impacts of drawing down the groundwater as well as the impacts of its plan for discharging water. Finally, the dewatering structure should be moved westward to decrease the likely erosion and sedimentation its discharge causes.

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

Letter – [Clean Air Council – 1-28-18 – Yellow Breeches Creek Crossing](#)

2. Comment:

I am submitting the following comments regarding ETP/Sunoco Logistics Mariner 2 105 permit reevaluation. If I Had more time these comments would have been more extensive and complete. Please see the following and the attached documents.

Several Comments in regards to the following document HORIZONTAL DIRECTIONAL DRILL ANALYSIS YELLOW BREECHES CREEK CROSSING PADEP SECTION 105 PERMIT NO.S: E21-449

- Page 2: They refer to the pipe design radius as being 1,600 feet for the 16 inch pipe and 2,000 feet for the 20 inch pipe. Is this a typo?

- These documents did not adequately address possible impacts to local wells and well water. Instead they discussed wells in the area in general terms while failing to actually address the specifics of potential impacts from HDD. Considering this company's track record in other areas of the state, specifically south-eastern Pennsylvania and Silver Springs Twp. Cumberland County, it is critically important to require more specific information as to safeguards that will be taken to ensure that the integrity of all wells remain intact.

- The submitted documents only indicate wells in the PAGWIS database. Wells created before this database are not designated on maps including the one located at the farm which is well within the arbitrary 450 foot potential impact radius. See attached word document titled "Wells near proposed HDD"

- By their own admission paragraph three, page 7 of attachment 1, there is a likelihood that wells will be affected by HDD:

The potential for well interference related to pumping is generally greatest for wells aligned parallel to strike, rather than in wells drilled in the direction of bedding dip (i.e., perpendicular to strike). The presence of Diabase often acts as a barrier to flow (Becher and Root, 1981; and Wood, 1980). No groundwater modeling was performed for the area surrounding HDD S2-0250.

Before any permit approval you should require ground water modeling before drilling since there is a good possibility that 1 or more wells could be aligned parallel to the strike increasing the risk of damage to private water supplies.

- According to information on page 3 of Sunoco document and page 4 of Rettew Attachment 1 there are 32 identified wells within ½ mile radius of HDD. Of those it was determined that they only needed to contact 7 landowners within 450 feet of HDD. Sunoco did so by mailing documents offering to test wells to which only two landowners responded plus an additional one on the west side asked to have their well tested. To what extent did they make any other efforts to contact landowners who did not respond so that they were fully aware of the implications of HDD bore relative to their well water systems.

•They stated that During 2nd borings in August 2017 they only documented the upper extent of groundwater but did not indicate the depth to which ground water occurs in these areas nor whether or not the depth at which they now plan to drill may result in encountering groundwater at deeper levels bgs (e.g. Bore 1 near western HDD exit: groundwater encountered ~7-8 “ below ground surface; Bore 2 near eastern HDD exit: groundwater encountered ~18-25 “ below ground surface). Nor did they indicate the depth of the wells that could potentially be impacted by this process especially since they are proposing to deepen the HDD bore by a substantial amount.

•**page 11: incomplete survey of HDD fracture trace due to cattle in field.**

Upon examination of an old aerial image of this site (Penn Pilot 1937) they is more land surface visible due to less vegetation (see attached). As a consequence the viewer can see shallow depressions and wet soils across the land surface which may show locations of additional fracture traces than indicated on the Satellite image maps found on pages 17 and 18 of attachment 1. If additional fracture traces do exist within proposed HDD location then there is a greater possibility of additional groundwater impacts should this current proposal be approved by DEP. This along with any other inadvertent returns could have lasting impacts for an undetermined period of time on the Yellow Breeches Creek and ground waters of the surrounding area.

Therefore, before any permit reevaluation approval the DEP should require that ETP/Sunoco Logistics do a complete survey for fracture trace instead of accepting the current incomplete survey. (6)

Attachment 1 – [Kim Van Fleet - Penn Pilot 1937](#)

Attachment 2 – [Kim Van Fleet – HDD and Wells](#)

3. Comment

Probably not right way to respond to hdd boring of Yellow Breeches Creek but don't know any other way. This is about permit no. S2-0250 and PA-CU-0203.0000-WX. This is a high-quality trout stream, very bad to work near it, their record is very bad in hdd drilling, they were going to hdd 2 streams on my property, have now changed their mind and have clear cut my wetlands, cutting over 20 mature pines and others, they stripped all vegetation from right of way, very bad erosion now, doing this has contaminated my well, making it non-potable, we have had no water since June. I have given them proof that it is there fault, sent it to Ron Eberts 2 months ago, Sunoco has it too. They are ignoring it, we have health problems along with this from not being able to bathe right anything they do is bad, no respect for anything, stop the drilling!!! (7)