

November 23, 2017

Via Electronic and First Class Mail

Scott R. Williamson  
Program Manager Waterways and Wetlands Program  
Department of Environmental Protection  
South-central Regional Office  
909 Elmerton Avenue  
Harrisburg, PA 17110

Re: Reevaluation Report  
Joanna Road Crossing (S3-0250)  
Permit No. E06-701  
Caernarvon Township, Berks County

Dear Mr. Williamson:

In compliance with the Corrected Stipulated Order dated August 10, 2017 (Order) a Reevaluation Report on the above-referenced horizontal directional drill (“HDD”) was submitted to the Department on October 5, 2017. The Department requested more information on the Reevaluation Report by letter dated October 10, 2017, and a response to the Department’s request was sent by letter dated October 26, 2017. The Department has now sent a second information request by letter dated November 22, 2017. Please accept this letter as a response to this request.

Regarding the statements in paragraph two of your most recent letter, and supposed omission of data regarding the potential impacts to water supply well production zones for all water supplies located within 450 feet (ft) of this HDD; SPLP can affirm that all known water supply wells and their production zone known at the time of preparation of the HDD reanalysis were included in the submittal.

As stated in SPLP’s data response letter dated October 26, in accordance to the Order, letters were sent to the nine landowners within 450 ft of this HDD profile. As a result of this effort and other communications, two previously unknown private water wells were identified to SPLP.

Well No. 1 is located 340 ft west-northwest of the west entry point of the Joanna Road HDD, and is up gradient of the HDD entry and planned profile of pipeline installation. This water well has been subject to further studies by SPLP which have been provided to the Department previously. Due to this well’s physical location, depth, and direction of groundwater movement, SPLP has concluded that SPLP has not and will not impact this well and this conclusion has been accepted by the Department.

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Well No. 2 is located 300 southwest of the HDD, perpendicular to Station 2+00 on the profile, at an elevation 40 ft higher than the HDD. This water well is upgradient of the HDD profile and direction of groundwater flows. Based upon the information obtained for this water well, and our analysis, SPLP believes there is no risk to the water production zone for this water supply relative to this HDD.

No further information regarding the presence of water wells has been obtained as a result of SPLP's outreach efforts and ground investigations.

Despite the above information indicating no potential risk to private water wells, SPLP has implemented a number of safeguards if private property owners should experience any adverse effects to their drinking water wells from the construction of the pipeline. These safeguards are set forth in the HDD Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan (revised August 8, 2017) approved by the Department.

We therefore request that the Department approve the Reevaluation Report for Joanna Road HDD (S3-0250) as soon as possible.

Sincerely,



Matthew Gordon  
Project Director