

April 30, 2018

Via Electronic Mail

Dana Drake, P.E.  
Environmental Program Manager  
Waterway and Wetlands Program  
Pennsylvania Department of Environmental Protection  
Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745

**Re: Addition of Aquabloc Drilling Fluid  
Hydrological Reevaluation Report  
HDD S2-0070, Permit No. E11-352  
William Penn Avenue Crossing  
Jackson Township, Cambria County**

Dear Ms. Drake:

In a supplemental communication dated April 18, 2018, Sunoco Pipeline, L.P. (SPLP) withdrew the intended use of DrilPlex™ as an additive to the drilling fluids for use during the pilot phase of HDD S2-0070.

SPLP has consulted the Department's list of approved additives and fluids; reviewed the NSF/ANSI Standard 60 list of approved drilling fluids, and consulted with certain manufacturers on their product capabilities. As a result, SPLP has identified Aquabloc LC and Aquabloc D (Aquabloc collectively) as a drilling fluid that has specific behavioral properties in combination with the standard bentonite/water drilling fluid mix that can be used to mitigate the migration of drilling fluids outside the bore hole of horizontal directional drills.

The Department has verified that Aquabloc is an approved drilling fluid; therefore, SPLP proposes to use Aquabloc as a component of the drilling fluids for use during HDD activities for HDD S2-0070-William Penn Avenue to minimize the potential to impact water supply wells in near vicinity to the HDD profile. SPLP will follow the manufacturers recommended rate of use in accordance with this product's NSF/ANSI Standard 60 certification.

During all HDD activities, SPLP will implement the HDD best management practices in accordance with the April 2018 "*HDD Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan*" to control and minimize the movement of drilling fluids within the geology surrounding the HDD profile.

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To update our prior communication, SPLP has engaged the water utility staff with Jackson Township, and the process is moving forward to install the public water supply for the residents along Allbaugh Park Road and Creekside Drive at SPLP's expense. SPLP continues to re-contact these same residents to offer and make arrangements for temporary water supply during HDD activities at SPLP's expense.

SPLP submits that we have been, and are, in complete compliance with the agreed terms and requirements of analysis of the Order, as agreed to by the Department, and that no further analysis is required for the Department to consent to the start of this HDD. We therefore request that the Department approve the Reevaluation Report for the William Penn Avenue crossing (S2-0070) as soon as possible.

Sincerely,



Larry J. Gremminger, CWB  
Geotechnical Evaluation Leader  
Mariner II Pipeline Project