

**DEP Permit # E22-617**  
**DEP Permit HDD Reference # PA-DA-0063.0000-RD-16**  
**DEP HDD # S3-0081**  
**Township – Conewago**  
**County - Dauphin**  
**HDD Site Name – Woodbine Drive Crossing**

**1<sup>st</sup> Public Comment Period**

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**1. Comment**

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”), please accept these comments on Sunoco Pipeline L.P.’s (“Sunoco”) re-evaluation report (“Report”) for the horizontal directional drilling (“HDD”) indicated by drawing number PA-DA-0063.0000-RD-16 (the “HDD Site”).

## **1. The Report regards protection of water supplies as an afterthought.**

Like several other recent reevaluations from Sunoco, the present Report does not provide necessary detail regarding water supplies and water supply testing. There is a high concentration of water wells around this HDD, all of which must be protected. The Report does not demonstrate that Sunoco is prepared to do this.

First, the Report asserts that 51 wells were identified within 450 feet of the HDD alignment. Curiously, the Hydrogeologic Reevaluation also claims “water quality samples were collected by GES from 51 wells located within 450 feet of the HDD drill path,” suggesting a 100% response rate from landowners. Yet, Attachment 3 to the Report, which depicts well locations, indicates multiple properties within 450 feet of the HDD alignment where testing was refused. Sunoco should provide additional information to clear up this discrepancy of very basic facts.

Sunoco should also clarify when testing was offered and completed. In reevaluations of other sites, Sunoco has attempted to rely on water testing that took place before August 2017 and did not include pathogen testing. Such testing does not satisfy the requirements of the Order.

Here, Sunoco has not provided enough information in the Report to demonstrate that its testing was adequate.

Other details about water supplies and testing, including well depths, whether there were any incidents related to the drilling of the 20-inch line, and whether landowners are being provided temporary water supplies should be included in the Report as well. Such information helps provide a more complete picture of the risks to water supplies and is instructive as to whether Sunoco’s plans for the Site are sufficiently protective.

Finally, given the number of wells in close proximity to the Site, it would be prudent to conduct groundwater modeling. Sunoco has not done this and should be required to do so. Instead, Sunoco seems to suggest residents should give up their private water and turn to public water supplies, bemoaning the fact that “connection to the public water supply is currently voluntary and not required.” The Report notes multiple times that public water hookup is available to part of the neighborhood near the Site. That is of little moment and certainly does not absolve Sunoco of its responsibility to avoid destruction or interference with private water supplies.

Sunoco’s increasingly lax approach toward reporting specifics on water supplies and considering them in its plans is drifting even further from both the requirements of the Order, which mandates Sunoco to evaluate well production zones, and one of the basic purposes of the reevaluation process, which is to protect water supplies. The Department must not let this continue.

## **2. Sunoco's Alternatives Analysis is inadequate.**

In its alternatives analysis, Sunoco admits the use of auger boring is a feasible alternative, but summarily dismisses it, explaining landowner permission and potential legal action would be needed to acquire the necessary work space. While these considerations may be relevant, they cannot replace an analysis of the relative environmental impacts of using auger boring. Sunoco completely ignores environmental impacts and does not provide any quantitative information even about its own logistical concerns to justify its preference. Ultimately, HDD might be the less environmentally harmful option for the Site, but Sunoco must provide enough analysis to support that decision.

## **3. The new drilling profile does not seem to address the most problematic portion of the drilling alignment.**

The proposed redesign of the 16-inch profile is slightly deeper and longer than the original profile. This may be an improvement in terms of reducing overall risks of inadvertent returns at the Site, but there is no specific discussion in the Report of the chosen depth and length of the profile to support such a conclusion. The new profile also seems to do little to mitigate the risks of inadvertent returns at the portion of the profile that proved most problematic during the drilling of the 20-inch pipeline. A series of inadvertent returns were triggered by the drilling of one particular portion of the 20-inch profile. Despite the proposed 16-inch profile being deeper overall, the portion of the 16-inch profile that passes by where the inadvertent returns previously occurred remains relatively close to the 20-inch profile. Sunoco should have focused on improving—and possibly deepening—this particular portion of the 16-inch profile. If, for example, the 16-inch profile were lengthened, it could pass further below the problem area. The Department should require Sunoco to justify the specific profile depth it chose, especially in relation to the area where there were previous inadvertent returns.

Sunoco's lack of analysis is made even more problematic by the contradictions between its main Report and the Hydrogeologic Report. In its main Report, it writes that "The four IR events during the installation of the 20-inch diameter pipeline resulted from drilling fluid traveling along bed rock fractures and bedding planes from the HDD annulus and through soft overburden soils to the land surface. All four IRs occurred within 110 ft of the exit point." Section 6.0 of the Hydrogeologic Report documents six IRs rather than four. Moreover, it records them as taking place within 170 feet of the exit, not 110 feet. The Hydrogeologic Report makes clear that the drilling fluid spills were worse than reported in the Main Report, and took place within a deeper part of the profile. Figures 1 and 2 also diverge in illustrating where the IRs took place along the profile, showing both differing locations and differing numbers of IRs.

The Hydrogeologic Report further emphasizes in Section 9.0 that "The proposed 16-inch HDD profile is relatively shallow when compared with the land surface and

extends entirely within both the shallow unconsolidated regolith materials and weathered to unweathered bedrock.”

Clearly this is a site where analysis of depth of cover is required rather than boilerplate that deepening the profile will fix the problem.

#### **4. Figure 1 is not the permitted plan and profile, despite saying it is.**

As with some other recent reports, there are discrepancies between the plan and profile as permitted and as represented in Figure 1 in the Report. Figure 1 bills itself as “Figure 1. Permitted 16-Inch HDD Plan and Profile with 20-Inch IR Data.”

However, a review of the actual permitted plan on the Department’s website shows significant differences. See

<http://files.dep.state.pa.us/ProgramIntegration/PA%20Pipeline%20Portal/MarinerEastII/Dauphin/07%20-%20Site%20Plans/Tab%207B%20HDDs/PA-DA-0063.0000-RD-16.pdf>. The revision history is different, indicating a different drawing. The text of the “Design and Construction” section differs as well. For example, in Figure 1 the Internal Design Pressure is listed as 2100 PSIG, very different from the 1480 PSIG that the Department permitted.

As a result, it is not clear the meaning of Figure 1 or what it represents.

#### **5. The Report appears to not comply with paragraph 5.i of the Order requiring that it “document in detail the information considered for the re-evaluation of the design of the HDD.”**

The Report states: “SPLP possesses a full geologic profile from the drilling of the 20-inch pipeline and vertical geotechnical core data. No additional information is needed to evaluate the 16-inch HDD.” If that is the case, then the Report does not comply with the Order, which specifies at paragraph 5.i that “The Report shall document in detail the information considered for the re-evaluation of the design of the HDD at that site.” This “complete geologic profile” is nowhere to be found in the Report. Moreover, it does not appear to have been made available to Sunoco’s hydrogeologists, who do not describe knowing what that “full geologic profile” is. (1-5)

**Letter – [Clean Air Council – 3-13-19 – Woodbine Road Crossing](#)**

#### **2. Comment**

I am writing regarding the Mariner East 2 Pennsylvania Pipeline Project. HDD Reevaluation Report for HDD No S3-0081 Woodbine Drive.

I am concerned about the quality of my drinking water in my well. What are your procedures for checking my well water during drilling? (6)

Letter – [Paul Bricknell](#)

### **3. Comment**

On March 1, 2019 we received information from Mark McConnell, Land Project Manager, representing Sunoco Pipeline, L.P. (SPLP) regarding a Horizontal Directional Drilling (HDD) Reevaluation Report (HDD Report) for installation of a 16-inch pipeline within 450 feet of our property boundary. Because our property has a private water supply, we were invited to submit comments on the HDD Report to you within fourteen days of February 28, 2019. Many pages in the HDD Report are not numbered, limiting our ability to reference where information is cited. Also, the HDD Report is extremely technical, so we have limited our comments to our personal experience associated with the HDD of the 20-inch pipeline and our concerns for the microbial quality of our well water supply and property value.

#### **HDD vs. Open Cut Construction**

Open cut construction, while perhaps avoiding/minimizing additional well water contamination, might require cutting down trees and taking down parts of our board-on-post fence for SPLP to acquire the necessary temporary workspace. This in turn may reduce the value of our property. Thus, we believe it is in both SPLP's and our interests that the 16-inch pipeline be installed via HDD.

#### **Microbiological Water Quality**

The HDD Report mentions that, according to the Conewago Township website, there is public water service available from the Pennsylvania American Water Company in part of the property near the proposed 16-inch HDD. Our property on Laurel Drive does not have access to that water supply. The public water supply line for Laurel Drive ends at the Woodbine intersection. We are totally reliant on a private well that was drilled when the house was built circa 1970. Thus, we accepted SPLP's offer in 2017 to sample our well water pre, during and post construction associated with the drilling of the 20-inch pipeline. The attached table summarizes microbiological results from samples obtained over time that were originated either by us (Landowner), Conewago Township, or SPLP. Copies of the data as they appeared in the various reports are also attached.

A few things to note from the table:

1. Samples taken in 1987, 1998, and 2001 did not contain any coliform.
2. The 20-inch pipeline installation was completed August 1, 2018 according to Item 5 in the Executive Summary provided by Skelly and Loy (dated 2/26/19). We received reports from SPLP for two, not three, analyzed samples. The samples presumably are pre (6/7/17) and post (9/21/17) construction of the 20-inch pipeline. It appears SPLP did not take and analyze a sample "during" construction. In addition, we did not receive a copy of the 6/7/17 results until after 8/25/17.
3. Importantly the SPLP report for the 6/7/17 sample does not include any microbiological data, hence no data entered in the table. Absence of microbial data makes it impossible to establish a baseline immediately prior to HDD for the 20-inch pipeline.

4. Both the 8/15/17 and 9/21/17 samples contained total coliform and the 9/21/17 sample contained fecal coliform and E. Coli.

We would agree to have our well water sampled and analyzed pre, during, and post construction of the 16- inch pipeline. Furthermore, we would want assurance that microbiological analyses will be performed on all samples taken.

### **Alternative Water Supply**

We were contacted by SPLP in February 2018 regarding well contamination and were offered a temporary water supply. Since March 2018, we have received 5-gallon bottles of water from Cullogen at SLPL's expense, approximately every 4 weeks. We very much appreciate this as a short-term solution, but not for the long-term. The 5-gallon bottles are very heavy to carry. We need to be at home when new bottles are delivered and empties returned in order to have someone stronger than us carry the 5-6 full bottles from outside the house to where they are stored in our garage. When we need a full bottle, we carry it from the garage to the kitchen where the cooler is placed, but it takes the two of us to accomplish this task (one carrying the bottle, the other opening and closing doors). And, we are in our seventh decade and not getting any younger or stronger! Also, the cooler takes up space in the kitchen and the bottles (full and empty) take up space in the garage. A long-term solution is needed for not only the immediate relief of having to deal with the issues associated with the bottled water, but also our concern about the contaminated well on the resale value of our property.

### **Long-term Solution**

On March 3, 2018 we received a phone call from Ron Eberts, PAEPA, regarding the results of the SPLP water analyses. When we expressed our concerns about the long-term, he indicated that Sunoco has to make things right. We have identified the following three possible solutions:

1. **Public Water Supply:** SPLP could work with the Derry Township Municipal Authority to install a water line to the end of Laurel Drive and pay for affected residents to hook up.
2. **Shock the Well:** SPLP could shock our well, but that would not address the underlying contamination problem. Furthermore, the well would need routine microbiological analyses and potentially routine shocking. Who would be responsible for covering the associated costs?
3. **Install a UV Filter System:** Our local and well trusted plumber of 20 years provided us with an estimate for installation and annual servicing of a UV filter system (see attachment). He estimated it would cost \$576 for the system and material, plus 1.5-2.5 hours of labor at \$130/hour to install it. SLPL should bear the cost of installation, approximately \$771 to \$901. Reoccurring annual costs would be approximately \$150 for bulb replacement and service.

Our preference would be installation of a UV Filter System by our local plumber.

We appreciate the opportunity to provide our experience associated with the HDD installation of the 20-inch pipeline and our concerns about the future with the installation of the 16-inch pipeline. In addition to our mailing address, please feel free to contact us via email or telephone if you have any questions. (7)

Letter – [Frances & Michael Seligson](#)