

From: Bryan, Nick <Nick.Bryan@energytransfer.com>
Sent: Friday, September 17, 2021 1:29 PM
To: Hohenstein, John <johohenste@pa.gov>
Cc: Sharp, Ranjana C <rsharp@pa.gov>; Smith, Christopher <christopsm@pa.gov>; Vlot, Christian <cvlot@pa.gov>; Knorr, Donald <doknorr@pa.gov>; Embry, Christopher P <CHRISTOPHER.EMBRY@energytransfer.com>; Styles, Monica L <MONICA.STYLES@energytransfer.com>; 'Simcik, Robert' <Robert.Simcik@tetrattech.com>
Subject: RE: [External] HDD 290 Ch. 105 Comments

John,

As I mentioned on the open matters call, the January 4th 2021 letter with requirements referenced below was not related to the HDD 290 reroute submissions but rather our November 23, 2020 Ch 102 & 105 permit modification request for HDD 290 drill restart to install/maintain an unconventional pressure relief point at the IR location.

However, please find responses to the bullets as discussed on the call.

DEP Comment: Submit an estimate of drilling fluid still in ground and the likelihood that this fluid may be the source of another IR once drilling should occur.

SPLP Response: This comment is no longer applicable as the borehole has been permanently grouted.

DEP Comment: Submit an analysis of the stability of the adjacent pond's dam.

SPLP Response: The Geohazard Evaluation conducted in this area discusses the pond slope. It was provided in the Chapter 102 submission (pages 53 thru 62 of the .pdf).

A field reconnaissance was conducted by a geotechnical engineer on March 9, 2021 as part of the Geohazard Evaluation. Key observations during the field reconnaissance include:

- The slope is 4-foot high,
- No seeps or saturation were noticed on the southern dam embankment, and
- No evidence of slope instability was observed.

The pond is 4-5 feet in depth and located approximately 55 feet north of the proposed pipe trench. In addition, the proposed pipe trench is approximately 27 feet south of the toe of slope.

The Geohazard Evaluation states under the Steep Slopes section (pg 55) and the Field Reconnaissance section (page 57 of pdf) that "Given the distance from the slope, the 8-foot deep pipe trench excavation is not anticipated to impact the stability of the dam slope". Further, the Geohazard Evaluation states under the Conclusions/Recommendation section that "Shoring of the trench may be needed in this area if conditions warrant."

DEP Comment: Submit a description of the flow of the spring that originates in the formation where the IR occurred including a determination that flow can be maintained to support the wetlands during and after construction.

SPLP Response: The flow originates at this location and was successfully restored after the previous IR. The flow also has not been interrupted by the earth feature, flowable fill, or other actions in this area. The flow to support stream and wetlands during construction would be maintained by through a sand bag dam and pump or installation of a temporary flume pipe. The restoration of the site after installation of the pipeline involves removal of the flowable fill and introduction of similar soils and will be restored to an equal or better condition than pre-construction in accordance with the restoration plan submitted 6/4/21 per the conditions of the approved by Emergency Permit #EP1520023. The restoration of the spring flow will be closely monitored for successful restoration, with a full time Environmental Inspector and Professional Geologist on-site.

Let me know if you have any further questions.

Thanks,
Nick



Nicholas J. Bryan, P.L.S.

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From: Hohenstein, John <johohenste@pa.gov>
Sent: Monday, September 13, 2021 2:51 PM
To: Bryan, Nick <Nick.Bryan@energytransfer.com>; Embry, Christopher P <CHRISTOPHER.EMBRY@energytransfer.com>; Styles, Monica L <MONICA.STYLES@energytransfer.com>; 'Simcik, Robert' <Robert.Simcik@tetrattech.com>
Cc: Sharp, Ranjana C <rsharp@pa.gov>; Smith, Christopher <christopsm@pa.gov>; Vlot, Christian <cvlot@pa.gov>; Knorr, Donald <doknorr@pa.gov>
Subject: RE: [External] HDD 290 Ch. 105 Comments
Importance: High

Nick,

We have been unable to find references to the extracted bullets below from the attached January 4, 2021 letter detailing Permit Amendment Requirements for HDD S3-0290.

- Submit an estimate of drilling fluid still in ground and the likelihood that this fluid may be the source of another IR once drilling should occur.
- Submit an analysis of the stability of the adjacent pond's dam.
- Submit a description of the flow of the spring that originates in the formation where the IR occurred including a determination that flow can be maintained to support the wetlands during and after construction.

If part of the submission, please point us in the right direction, if not, please submit.

Thanks,

John

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