July 26, 2019

Pamela Alley
Shell Pipeline Company, LP
WCK Building A
150 North Dairy Ashford Road
Houston, TX 77079

Chris Houx
Minnesota Limited
PO Box 410
Big Lake, MN 55309

RE: Hydrogeological Restart Report
        HDD HOU-09
        Independence Township, Beaver County

Dear Ms. Alley and Mr. Houx:

The Department of Environmental Protection (DEP) reviewed Shell Pipeline Company, LP's (SPLC) Restart Report dated July 23, 2019 (Report) for the above referenced Horizontal Directional Drill (HDD). The Report was required per the November 2018 HDD Inadvertent Return Assessment, Preparedness, Prevention and Response Plan because of an inadvertent return (IR) to a surface water of greater than 50 gallons.

The Report recommends the following actions for minimizing the risk of future IRs: SPLC installed berms around both the entry and exit pits to prevent rain water from infiltrating the bore hole and/or address any change in groundwater table levels due to the elevation difference between the exit and entry pits. SPLC will complete additional monitoring to the entry side during and after rain events. SPLC is authorized to restart the HOU-09 HDD implementing the actions SPLC set forth in its Report.

The return of drilling fluids to ground surface or surface waters, including wetlands, is not authorized or allowed by the permits that have been issued for this project. The return to surface constitutes a violation of SPLC's permits, the Solid Waste Management Act, and, for returns occurring in, or to, waters of the Commonwealth, the Clean Streams Law.

Any returns of drilling fluids to the ground surface or surface waters, including wetlands, associated with HDD or other trenchless construction methodologies may be subject to civil penalty liability.

If you have any questions regarding this letter, please contact me at 412.442.4127 or aevan@pa.gov.

Sincerely,

Aileen Evan
Environmental Group Manager
Waterways & Wetlands Program

cc: BCCD – via email
        Sean Larson – via email
        AECOM (Heather Brewster) – via email