

September 4, 2019



By Email

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**Re: Sunoco's response to the Department's telephonic request for information on PA-CU-0136.0020-RD-16 (HDD# S2-0240-16)**

Dear Mr. Williamson,

By conference call on August 21, 2019, the Department requested additional information from Sunoco on the potential for Losses of Circulation (LOC) or Inadvertent Returns (IRs) during progress of the proposed 643-foot (ft) Guided Bore under the Norfolk and Southern Railroad, as a follow-up regarding Sunoco's reevaluation ("Report") of the horizontal directional drilling ("HDD") indicated by drawing number PA-CU-0136.0020-RD-16 (the "HDD Site"). Sunoco responded to the conference call on August 30, 2019, supplementing the Report and earlier correspondence. 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 regarding Sunoco's August 30, 2019 supplemental response ("August Response").

First, Appellants must note that because the specifics of the August 21, 2019 call between Sunoco and the Department were not made available to the public, the public is not able to fully discern the nature of the Department's outstanding concern. This makes it difficult to evaluate the adequacy of Sunoco's response. Nevertheless, Appellants are able to address the August Response to the extent it is facially flawed.

**Item 1c (mud rotary tooling):**

Sunoco writes:

Since LOCs occurred during the pilot phase drilling of the 20-inch pipeline, it has been confirmed that the subsurface is susceptible to the loss of drilling fluids. However, SPLP's experience with multiple HDDs and Guided Bores on the Pennsylvania Pipeline Project clearly shows that the occurrence of IRs and LOCs during the pilot hole phase is not a reliable indicator of the likelihood for these same issues to occur during the reaming phase. ...

Based upon the geotechnical data from the bore area and the observed “packing off” of the annular space during the ream, SPLP concludes the likelihood of discernable LOCs occurring during the reaming phase of the proposed Guided Bore is low.

Appellants wish merely to note that Sunoco experienced numerous and lengthy LOCs during the reaming phase of the HDD at this Site. The following is excerpted from Section 7.0 of Sunoco’s Hydrogeologic Reevaluation Report:

- October 14, 2017: The second complete LOR occurred when the 12-inch reamer was located approximately 60 feet from the entry point. Pretec continued to advance the reamer to a trajectory length of 230 feet. Prior to stopping for the day, Pretec pumped loss circulation material (LCM) into the borehole.
- October 30–November 17, 2017: 12-inch ream pass was resumed with continued full LORs to an approximate trajectory length of 900 feet from the entry point. Pretec initiated tripping out of the drill rods and swabbing the borehole. On November 17th, the 12-inch reamer was tripped out of the borehole.
- December 5, 2017: The third full LOR occurred when the 14-inch reamer was located at an approximate trajectory length of 1,185 feet.
- December 20, 2017: The fourth full LOR occurred as the reamer faced up at a trajectory length of 1,185 feet and began to ream the pilot hole.
- December 21, 2017: Full LOR continued as the reamer was advanced an additional 120 feet to an approximate trajectory length of 1,360 feet, before Pretec partially tripped out of the borehole in preparation for the Christmas Holiday break.
- March 5, 2018: Pretec initiated the 14-inch ream pass from the southeastern entry/exit point. After advancing the reamer approximately 5.5 feet, the fifth full LOR occurred, and reaming activities were suspended. It was decided to complete the 14-inch ream pass utilizing air rotary drilling techniques with minimal usage of water.
- March 20, 2018: Initiated the 22-inch ream pass from the southeastern entry/exit pit with full loss of returns. Because of the continuation of the LOR, it was decided to continue the 22-inch ream pass using air rotary drilling methods.
- May 16, 2018: Sixth full LOR occurred at an approximate trajectory length of 1,015 feet from the northwestern entry/exit pit.
- May 17–29, 2018: Continued 30-inch ream pass with periodic full LORs and placement of LCM plugs to try to regain circulation of drilling fluids. The 30-inch reamer was advanced to an approximate trajectory length of 1,276 feet from the northwestern entry/exit pit.
- May 30–June 1, 2018: Tripped 30-inch reamer into the boring from the southeastern entry/exit point and resumed 30-inch ream with continued full LOR.

Whatever packing off may have occurred did not prevent extensive losses of return / circulation during the reaming of the 20-inch at the HDD Site.

Thank you for considering these comments. Please keep Appellants apprised of any next steps.

Sincerely,

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