



Uwchlan Township

715 North Ship Road Exton, PA 19341-1940 Phone (610) 363-9450 FAX (610) 363-0518 www.uwchlan.com

10/23/2020

Submitted Via Email to ra-eppipelines@pa.gov

Re: HDD S3-0360 Horizontal Directional Drilling Analysis: Biddle Drive Crossing Comments

To whom it may concern,

Uwchlan Township has reviewed the re-evaluation of the HDD installation for the 20-inch diameter pipeline that crosses Biddle and Devon Drive in Uwchlan Township, submitted October 9th, 2020 and offers the following comments for consideration. Uwchlan Township recommends that the PA DEP requires that the design professional evaluates and documents the effects of the groundwater impacts to the Aqua public water supply wells located on Shoen Road in the report. These wells supply public water to Uwchlan Township and West Whiteland Township and are two properties to the west of the Shoen Road drill site. The Aqua property with the wells is approximately 840 feet west of the Shoen Road drill site. The current report does not acknowledge these public water supply wells, nor address the limits of the groundwater impacts that may be occurring. The report discusses private wells within 450 feet of the HDD location only. Justification to the limits of 450 feet should be provided.

Uwchlan Township recommends the report specifically address the need for casing pipe installation at the HDD entry / exit locations. The report should address:

1. Whether the casing pipe is required for the work.
2. If there are other alternatives to the casing pipe or installation methods for the casing pipe.
3. If the casing pipe is to be removed following the pull back work.
4. The potential for subsidence around the casing locations.
5. The ability to pull the casing without adverse effect to the installed pipe and adjacent active Sunoco pipes.

The Devon Drive HDD entry/exit area is located in a densely populated neighborhood and the casing installation severely impacts the residents in a large radius around the drill site. We recommend that alternate methods to provide a safe drill site be investigated and implemented.

As noted in the reevaluation reports, there are numerous fractures and a ketch fault along the HDD corridor, including in portions of Uwchlan Township. The Township recommends that the HDD reevaluation report specifically address the fractures/fault and the impacts to the groundwater/drilling mud operation at the locations (potential loss of material at the fractures).

Uwchlan Township recommends that additional analysis be completed for the reevaluation report and the geophysical survey related to existing pipes. The report and survey do not address the existing active pipelines that are located adjacent to the proposed 20" pipe.

Uwchlan Township recommends that further analysis of the vertical alignment be completed to determine if the 20" pipe can be installed at a higher elevation to avoid the impacts to the groundwater. With the well monitoring that has been completed and is ongoing, there should be sufficient data to determine an elevation that would reduce the impacts to the ground water.

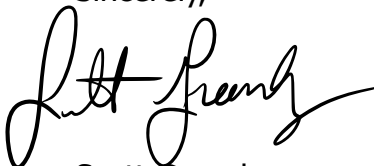
As noted in the HDD reevaluation, the ground water levels were severely impacted due to the discharges that occurred during the 16" pipe HDD work. Uwchlan Township recommends the HDD reevaluation reports address impacts to the corridor that may occur from the fluctuation of the groundwater levels in this area, including any impacts that may occur to the soil stability due to the flow of this ground water (potential subsidence of the ground).

Uwchlan Township recommends Sunoco be required to submit additional analysis regarding the impacts of the HDD work related to the annulus grouting post pipe pull back on the naturally occurring seep at the north side of Shoen Road. As noted in the conclusions of the reevaluation report, a small diameter pipe will be inserted from the southeast/Shoen Road entry location and grout will be injected into the hole until refusal. Per the Skelly and Loy seep evaluation (dated July 2, 2020), it was concluded that this seep drainage patterns extends approximately 250 feet from the seep to an unnamed tributary to Valley Creek. The report should address the potential for this seep to be eliminated and/or relocated due to the grouting process, and the impacts to drying up of this seep in the post construction condition. The report should address the post monitoring procedures for this work and potential impacts that this seep may relocate to another property/location in a densely populated area.

Uwchlan Township recommends that additional work be completed for the Geophysical Survey. As noted in the February 27, 2020 Geophysical Survey prepared by Rettew (page 2 of 5), "the actual exit/entry area was inaccessible due to wooden and plastic matting." It is important to complete the survey in the area of the proposed work to determine if any areas of concern are noted.

Uwchlan Township thanks you for your consideration of the above listed comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Greenly". The signature is fluid and cursive, with the first name "Scott" and last name "Greenly" clearly distinguishable.

Scott Greenly
Township Manager
Uwchlan Township