

May 28, 2019



By Email

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Re: Sunoco's response to the Department's request for information on PA-HU-0106.0000-RD-16 (HDD# S2-0154-16)

Dear Mr. Williamson,

On April 1, 2019, the Department requested additional information from Sunoco regarding its reevaluation ("Report") of the horizontal directional drilling ("HDD") indicated by drawing number PA-HU-0106.0000-RD-16 (the "HDD Site"). Sunoco responded to the April 1, 2019 letter on May 22, 2019, supplementing the Report. 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 May 22, 2019 supplemental response ("May Response"). The comments are numbered to correspond to the numbering in the Department's April 1, 2019 requests and the May Response.

1. Justification of Drilling Path

The Department made a number of requests related to Sunoco's lack of explanation or justification for the specifications it is proposing for the 16-inch profile. First, the Department pointed out that Sunoco "failed to fully utilize information gathered during the HDD of the 20-inch bore as part of the HDD Re-evaluation for the 16-inch pipeline." The Department requested Sunoco gather this information, and, specifically that Sunoco include "geologic and drilling information collected by various site personnel during the drilling of the 20-inch bore that can be used to synthesize a comprehensive history of each or groupings of events." In the Report, Sunoco had claimed that it relied on a complete geologic profile from the drilling of the 20-inch HDD. This makes it especially important that Sunoco provide the full geological profile from the 20-inch HDD and discuss how that data informed its plans for the 16-inch line.

Sunoco provides some useful information for its drill path determination. However, despite the Department specifically calling this out, Sunoco has still failed to provide the full geologic profile from the drilling of the 20-inch line or to discuss how it was used in any meaningful detail. In its May Response, Sunoco argues that it provided "cross section views" of IR events. While those data points were a helpful addition, it is not the same as or a substitute for the full geologic profile for the 20-inch drill. Sunoco needs to explain and provide the data to support

what specific geological conditions it encountered along the entire path of the 20-inch drill. Without that information, Sunoco's claim that it relied on the geologic profile from the 20-inch profile and that no additional geotechnical information is needed remains baseless. Sunoco should be required to provide this information as the Department requested.

Similarly, Sunoco refers to having relied upon daily drilling and HDD inspection reports. Sunoco does not provide any of them or their content, only general statements about what it considered. What specific observations, findings, or other information from these sources was used in designing the new 16-inch profile? How did that specific information inform the design of the 16-inch profile?

2. Overall Report Items

d. Attachment 1 should be revised to reflect the fact that the eastern portal is not an "exit" as it currently indicates.

3. Water Supplies

The Department asked Sunoco to evaluate and discuss how the proposal for the 16-inch profile will "minimize the potential for IR's and impacts to water supplies," as well as provide other information. Sunoco provides no such evaluation or discussion of minimization. Instead, it discusses the sampling during and after the construction and a water supply complaint.

How will Sunoco protect these water supplies during drilling of the 16-inch? Additional data is needed to establish baseline readings before drilling for the 16-inch line can commence. Per the Order, residents also need to be offered water testing before, during, and after the drilling of 16-inch line. Sunoco should make clear that it intends to follow through on this obligation.

4. Pipe Stress Allowances

The Department asked for "further explanation of how the following statement [on pipe stress allowances] applies to *this* HDD re-evaluation." (Emphasis added). Sunoco spends most of a page describing in general terms the theory of pipe stress allowance in pipeline design without mentioning this HDD re-evaluation. Then it appends a pro forma statement that could apply to literally any of its HDD re-evaluations: "All of the information and the stress assessment procedures above are incorporated into the profile design and implemented in analysis of the drilling profile to ensure the integrity of the pipeline as installed." How so? Sunoco does not explain.

None of the information Sunoco provides is specific to this HDD re-evaluation. Based on Sunoco's response to comments on another HDD site, Appellants anticipate that Sunoco will claim some misunderstanding on Appellants' part. Appellants understand the difference between setting forth an explanation of what pipe stress allowance is and how it works in general versus how it factors into this Site. In fact, Sunoco supplies some information in response to Item 1 about how pipe stress allowance factored in here. It should not be hard to round out the rest of the information in response to Item 4, but Sunoco has not.

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

Sincerely,

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