

August 21, 2019



By Email

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Re: Sunoco's response to the Department's request for information on HDD PA-HU-0110.0000-SR-16 (HDD# S2-0155)

Dear Mr. Williamson,

On March 21, 2019, the Department requested additional information from Sunoco regarding its reevaluation ("Report") of the horizontal directional drilling ("HDD") indicated by drawing number HDD PA-HU-0110.0000-RD-16 (the "Site"). Sunoco responded on August 14, 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 the Department's request and Sunoco's August 14, 2019 response ("August Response").

1. Sunoco has not provided the data or analysis or claims to rely on.

The Department asked Sunoco to use the data it gathered during the drilling for the 20-inch line to synthesize a comprehensive history of the events at the site and to describe the bore path it has chosen or the 16-inch line. Sunoco claims to have utilized all information obtained during the drilling of the 20-inch line during "internal assessment and evaluation." It is precisely that internal process that is presently under review and needs to be verified by the Department in this reevaluation process. Despite the Department's clear direction, Sunoco has still not disclosed the data or analysis that was part of that internal review. The daily drilling reports, HDD Daily inspection reports, annular mud pressure data, and other data that informed Sunoco's internal review should be made part of the Report.

Sunoco has also still not explained why it has chosen the particular path it has chosen for the 16-inch redesign. It has provided no analysis as to why the planned depth is preferable to other depths.

Sunoco also claims that "Figure 1 in Attachment 2 represents a graphical presentation of the plan and cross section views of conditions encountered during the completion of this HDD." Between the Report and August Response, there are numerous documents labeled "Attachment 2" which include figures, but none show what Sunoco is claiming. Appellants assume Sunoco is

referring to “Figure 1. Original Permitted 16-Inch HDD Plan and Profile” which is part of “Attachment 2” to the Report. That drawing does not include any IRs despite the Department pointing out, and Sunoco admitting, there were multiple IRs at the Site. The August Response includes an “Attachment 2” with an untitled figure that shows a single IR. It is also unclear what Sunoco is referring to when it claims that “This figure presents the events occurring during this HDD in relation to the depth of profile and allowed for correlation to monitoring data collected by the monitoring geologists during active drilling.” No monitoring data or evidence of correlation to monitoring data is apparent from the either figure.

The Department should continue pressing Sunoco to provide specific, data-based justification for its redesign.

2. Sunoco continues to provide inconsistent information regarding geologic formations in the vicinity of the Site.

The Department pointed out that Sunoco’s geologists repeatedly referred to the Onondaga Formation in the Report. The Department requested clarification, noting that additional geotechnical surveying may be necessary. In the August Response, Sunoco dismisses its references to the Onondaga Formation: “The reference to the Onondaga Formation in the report was a result of the Onondaga Formation being identified as the geologic formation located at Soil Boring SB-01 in the 2014 geotechnical investigation.” This is problematic for two reasons. First, the implication that there is only one reference to the Onondaga Formation in the Report is inaccurate. The Onondaga is referenced at least fifteen times in the Report, hardly a passing mention. One of the references in Rettew’s Executive Summary states explicitly, “The site is underlain by carbonate and sedimentary rocks of the Devonian age Onondaga Formation (Doo) and Hamilton Group (Dh).” That statement, and several others in the Report, do not comport with Sunoco’s claim that the Onondaga Formation was only referenced as a result of a single test bore. Second, Sunoco’s assertion that SB-01 was located in the Onondaga Formation contradicts the geologic maps in both versions of the Rettew Report, both of which place SB-01 in the Hamilton Formation. If anything, Sunoco’s statement in the August Response regarding the Onondaga Formation supports the Department’s concern that the formation may underlie the site at a shallow depth. In the new version of the Rettew Report, Sunoco has simply deleted Rettew’s previous statement that the Onondaga Formation underlies the Site, and added a statement that SB-01 was drilled in the Onondaga Formation. This adds to the internal inconsistency of the Rettew Report. Clarification is still needed. In particular, the results of SB-01 and its location are now in question.

3. Sunoco has not adequately addressed karst and carbonite geology.

Sunoco’s contradictions regarding the significance of the Onondaga Formation in its redesign of the 16-inch profile led the Department to conclude, “geophysical surveys should be conducted for the length of HDD and the borehole profile should be evaluated accordingly.” As explained above, Sunoco has not resolved those contradictions. It remains unclear to what extent carbonite and karst geology could impact the redesign. Accordingly, Appellants agree with the Department’s recommendation that geophysical surveys should be performed for the length of the profile.

4. Sunoco has failed to provide complete information on bedrock depth.

In the Report, Sunoco identified the approximate bedrock depth at only one location. In the August Response, Sunoco claims to have revised the profile schematic. The revised drawing shows the approximate depth of bedrock at only one additional location. As suggested by the Department, Sunoco should use data from the 20-inch line, geophysical surveys, and additional geotechnical borings to provide a complete picture.

Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site.

Sincerely,

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