

December 19, 2017

Mr. Matthew Gordon  
Sunoco Pipeline, L.P.  
535 Fritztown Road  
Sinking Spring, Pennsylvania 19608

Re: Hydrogeological Re-Evaluation Report  
Yellow Breeches Creek Horizontal Directional Drill Location (S2-0250)  
Application No. E21-449  
Upper Allen Township, Cumberland County

Dear Mr. Gordon:

The Department of Environmental Protection (DEP) is requesting Sunoco Pipeline, L.P. (Sunoco) to provide information to address the following comments related to the Horizontal Directional Drill (HDD) Analysis for the Yellow Breeches Creek Horizontal Directional Drill Location (S2-0250), E21-449, posted on the DEP Mariner East II pipeline portal webpage on November 27, 2017. This request is necessary to add critical plans and procedures to this HDD to minimize the potential for an inadvertent return, fluid flowback, or unauthorized discharge of drilling fluid to Waters of the Commonwealth to occur during completion of these two HDDs.

Based on the HDD re-evaluation report, the geologic conditions at this site, and Sunoco and DEP geologists' review, the potential to encounter significant quantities of groundwater exists in one section of the HDD. This could result in flow back to the HDD entry point as the HDD progresses through a critical stage east of Yellow Breeches Creek and proceeds upslope toward the HDD exit point. To sufficiently monitor this potential situation, DEP requests that Sunoco add to this HDD re-evaluation a statement that Sunoco management and technical representatives will be present on site during this critical phase of these HDDs. Further, DEP requests that Sunoco add a required notification to the DEP Southcentral Regional Office at least three days in advance of reaching this critical stage of each HDD bore.

Additionally, DEP requests that Sunoco revise the re-evaluation to include a plan and schedule that identifies that all necessary water collection, treatment equipment and ancillary facilities be on site and operational prior to advancing the HDD bore to an elevation that exceeds the surface elevation of the HDD launch pad on the east side of the creek. Also, grouting of the annulus space during or after pipeline installation may be necessary to prevent sustained groundwater discharge and/or continuous dewatering impacts.

Finally, given that Sunoco is proposing to capture, filter, and discharge any flowback water and drilling fluid on site, Sunoco should revise the E&S Control Plan to identify the location and type of capture and filtering BMPs that will be utilized and submit a revised site specific E&S Control plan for this HDD site.

If you have additional questions, please call me at 717.705.4765 or email at [emuzic@pa.gov](mailto:emuzic@pa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'E. J. Muzic', written over a light blue horizontal line.

Edward J. Muzic, P.E.  
Civil Engineer Manager, Hydraulic  
Dam Safety, Waterways & Wetlands Section

cc: Matthew T. Bruckner, P.G., RETTEW  
Douglass J. Hess, P.G., Skelly and Loy