

July 10, 2019



By Email

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Re: Comments on Report for HDD PA-CH-0138.0000-RD (HDD# S3-0331)

To whom it may concern:

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 on Sunoco Pipeline L.P.’s (“Sunoco”) re-evaluation report (“Report”) for the horizontal directional drilling (“HDD”) indicated by drawing number PA-CH-0138.0000-RD (the “HDD Site”).

1. This reevaluation is premature and incomplete because the installation of the 16-inch pipe is ongoing and has been significantly delayed without explanation.

Drilling for the installation of the 16-inch line at the Site began prior to July 25, 2017. Two years later, that installation is still not finished. According to the Report, reaming is 74% complete. The extreme delay in the construction at this Site warrants thorough analysis and should be central to this reevaluation. Yet Sunoco barely acknowledges the delay. The Hydrogeologic Reevaluation Report (“HRR”) asserts “relatively few issues with LOCs and IRs” have occurred at the Site. While the Report does describe the rate of drilling as being slow, it seems unlikely that could explain a two-year delay either. It is critical that Sunoco fill in the gaps in this story. Without a thorough analysis of what happened – and is happening – with the construction of the 16-inch HDD, this reevaluation is incomplete and premature. Such an analysis is the starting point for understanding how to prevent similar problems, whatever they may be, during the installation of the 20-inch line. Moreover, residents and the Department alike need to be informed about how long drilling for the 20-inch line will take. Sunoco probably has not prepared anyone for another year or two of drilling operations at the Site. The long-term nature of the construction at the Site may be a threat to residents and the environment.

2. Sunoco has conducted insufficient geotechnical surveying.

Sunoco conducted multiple test bores in the vicinity of the Site. The first series of test bores met auger refusal at very shallow depths, ranging from just 10 feet to 30 ft bgs. One subsequent test bore was drilled deeper, to 80 ft bgs. Sunoco is proposing to run the 20-inch line up to 153 ft bgs. It does not appear Sunoco has any site-specific data regarding the rock at this depth. The HRR admits, however, that deeper bores in similar rock revealed weathering that exceeded 100 feet of depth. While Sunoco references its drilling experience with the 16-inch line, it does not provide any of the data. Without such data, it remains unclear why Sunoco has chosen to run the 20-inch HDD at the specific depth it is proposing. The Department should require Sunoco to disclose all relevant data for this Site and to conduct additional testing as necessary. The Department should also require Sunoco to justify the depth of its redesigned profile by contrasting it with the possibility of drilling at other depths. This analysis should include a discussion of any challenges that may arise related to steering at Sunoco’s chosen profile depth. Drilling through gneiss has proven problematic for steering at other sites and that challenge could be compounded by the length of the proposed profile.

3. Sunoco does not have plans for managing groundwater discharge.

The HRR points out that “Although the risk of a groundwater discharge at either entry/exit is small, the drilling contractor should be prepared to manage this type of discharge.” The Report does not include any such plans. The Department should ensure that Sunoco has site-specific plans for handling possible groundwater discharge. This especially important given the high number of structures and utilities in the vicinity of the Site that could potentially be damaged by the discharge.

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

Regards,

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