



October 4, 2019

By Email

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Re: Comments on Report for HDD PA-CH-0370.0000-RD (HDD# S3-0500)

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 indicated by drawing number PA-CH-0370.0000-RD.

1. The plans should be revised to clearly delineate high risk areas.

The results of the geophysical surveys indicate several fractured areas that present a risk of inadvertent returns and LOCs. In order for everyone working the site to make the best use of the information gathered in the geophysical surveys, the results should be juxtaposed with a cross-sectional view of the 20-inch line so the highest risk areas can be readily identified. Currently, Figures 3, 4, and 5 in the Geophysical Survey Report include cross-sectional views of the as-built 16-inch line, but not the proposed 20-inch profile. There is a blank place holder for the planned 20-inch line in the key for each figure. This information should be incorporated into the technical drawings that will actually be used on site. Sunoco states it will share the results of the fracture trace analysis with the crew, but the geophysical survey data is more robust and accurate. The enhanced risk of IRs at this site needs to be taken seriously. Even if there are not waterbodies in the immediate vicinity of the site, it is located in a densely populated area, and dozens of properties are at risk of being damaged by upland IRs.

2. Sunoco had not accounted for steering challenges associated with local geology.

The proposed profile will pass through Baltimore Gneiss, a formation known for heterogeneous rock that can lead to difficulties in drilling and steering. Sunoco had to abandon an attempt to install the 16-inch line at this location due to steering difficulties. And yet, the Report does not propose a course of action to address the steering problems that could arise with the next installation. At other HDD sites where Baltimore Gneiss was encountered, Sunoco's geologists made specific recommendations for how best to proceed, including recommendations

regarding drilling rate and pressure, and to use a diamond bit. The Department should ensure that an appropriate plan is in place to avoid and mitigate steering difficulties here.

3. Sunoco had not provided sufficient evidence that it will test and protect water supplies.

Sunoco identified 84 parcels within 450 feet of the HDD alignment at this site. Sunoco claims, “As a result of the landowner outreach, SPLP verified the presence of one (1) private water supply well, and confirmed the remaining eight-three (83) landowners are served by public water.” Sunoco should clarify how it confirmed that 83 of the parcels are served by public water as this statement is ambiguous. It is highly unlikely that Sunoco actually received replies from residents at all 84 parcels or made direct contact with them, so Sunoco may be relying on records from the local water company or another source, but some form of verification is needed. The highly fractured nature of the geology at this site puts any private water supplies that are present at risk.

Sunoco also claims that the one private well it did identify was not impacted by its drilling, but this cannot be confirmed as Sunoco only conducted baseline testing, not testing during or after the drilling of the 16-inch line as required by the Order. Sunoco should confirm that it will offer this landowner (and any other private well owners if more are identified) complete testing in association with the installation of the 20-inch line.

4. The analysis ruling out Direct Pipe Bore is unpersuasive.

In Sunoco’s alternatives analysis, it rules out the use of Direct Pipe boring technology. It writes:

SPLP’s construction contractors have successfully completed one (1) Direct Pipe Bore approximately 925ft on the Pennsylvania Pipeline Project at the crossing of the Frankston [sic] Branch of the Juniata River in Blair County. This Direct Pipe Bore was setup within a relatively flat area immediately outside the river floodplain and bored under the floodplain, wetlands, and river, exiting at the toe of a mountain slope.

Application of Direct Bore technology along the HDD S3-0500 alignment is not feasible as the alignment requires steering in both the horizontal and vertical dimensions to replicate the HDD. Alternately, even using a direct bore where the alignment is straight for reasonable length, the entry pit dimensions to employ this method are larger than what is required for a conventional bore. The entry pit could not be closed until the bore was completed and the pipe segments welded together. Due to disruption to traffic that would result from a long-term closure of the roadway, SPLP concludes that an HDD crossing of this area remains the preferred methodology.

This analysis seems to identify three problems with the use of Direct Pipe at the Site. First, the setup site needs to be “relatively flat” such as at the Frankstown Branch crossing. Second, this drill would need horizontal steering. Third, it needs an entry pit larger than that needed for a conventional bore. However, the profile view of the Site reveals it is “relatively flat.” It would need less vertical steering than the Glen Riddle HDD Site, where Sunoco has proposed Direct Pipe (see

http://files.dep.state.pa.us/ProgramIntegration/PA%20Pipeline%20Portal/MarinerEastII/HDD_Reevaluation_Reports/Glen_Riddle_Road/Glen%20Riddle%20Road%20and%20Southeastern%20PA%20Railroad%20-%20S3-0620%20-%20PA-DE-0100.0000-RR.pdf). Sunoco has not said that the amount of horizontal steering needed presents any sort of technical difficulty. Finally, the alternative Sunoco is proposing is not a conventional bore. So to compare the pit size to that of a conventional bore ignores that the proposed HDD would use a larger pit.

Overall, Sunoco has not demonstrated that Direct Pipe, which it argues minimizes the potential for inadvertent returns, would not be a viable option at the HDD Site.

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

Sincerely,

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