

DEP Permit # E21-449
DEP Permit HDD Reference # PA-CU-0062.0000-WX-16
DEP HDD # S2-0170
Township – Lower Frankford
County - Cumberland
HDD Site Name – Graham Creek Crossing

1st Public Comment Period

Commentator ID #	Name and Address	Affiliation
1	Melissa Marshall, Esq. P.O. Box 408 1414-B Indian Creek Valley Road Melcroft, PA 15462	Mountain Watershed Association
2	Aaron J. Stemplewicz, Esq. 925 Canal Street 7 th Floor, Suite 3701 Bristol, PA 19007	Delaware Riverkeeper Network
3	Joseph Otis Minott, Esq. 135 South 19 th Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
4	Alexander G. Bomstein, Esq. 135 South 19 th Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
5	Kathryn L. Urbanowicz, Esq. 135 South 19 th Street, Suite 300 Philadelphia, PA 19103	Clean Air Council

1. Comment

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-CU-0062.00-WX-16 (the “HDD Site”).

1. Sunoco’s proposed plans for the Site do not avoid impacts to wetlands.

In the Alternative’s Analysis section of the Report, Sunoco claims: “The HDD will avoid surface impacts to biological features and results in no surface impacts to streams and wetlands.” This is inaccurate, and is contradicted by both other statements in the Report and the history of the Site.

The construction of the 20-inch pipeline at the Site resulted in multiple inadvertent returns, including spills into waters of the Commonwealth. While the newly proposed profile for the 16- inch line is deeper overall than the as-built profile for the 20-inch line, a comparison of the two profiles shows that for much for the length of the HDDs, there is actually little difference. Specifically, the eastern half of the proposed 16-inch profile is only slightly deeper than the 20- inch profile and seems likely to provide only a minimal reduction in the risk of inadvertent returns. This is significant because the Report says that, “[b]ased upon an analysis by the project geologists and HDD drilling specialists, the occurrence of the three IR events during the installation of the 20-inch pipeline was a result of the shallow depth of profile.” The Department should require Sunoco to explain why it has chosen the specific depth it has proposed for the 16- inch line and whether it would be more protective to plan a deeper profile.

A deeper profile could be achieved by lengthening the HDD. The entry and exit points for the proposed 16-inch line and the 20-inch line are currently planned in close proximity to one another, and just barely avoid the wetlands at the Site. Even if entry and exit pits are not physically located in wetlands, the risk of inadvertent returns is still increased for the shallower portions of the alignment approaching the entry and exit. In the Report, Sunoco admits: “The redesign of the HDD will not prevent all IRs. IR’s are common on entry and exit of the drilling tool.” Sunoco can reduce the risks to these wetlands by lengthening the profile so the portion of the profile that passes under the wetlands can be deeper. Sunoco never discusses this option in its Alternative’s Analysis, and should be required to do so.

2. The cause of the spill at station 19+08 remains unexplained, and contradiction exists about the details of the spills.

As noted above, Sunoco claims that “the shallow depth of profile” caused the three drilling fluid spills it documented. That explanation makes sense for the two that occurred near the entries/exits, according to Figure 2 at 8 feet bgs and 14 feet bgs. It does not make sense for the one that occurred nearly a thousand feet from the end of the 20-inch profile, according to Figure 2 at 68 feet bgs.

Also, according to Section 6.0 of the Hydrogeologic Report, there was a spill during the reaming of the 20-inch drill. The main Report only acknowledges “(3) IRs occur[ing] during the pilot hole phase of the HDD for installation of the 20-inch pipeline.” No reaming-phase IRs are acknowledged.

Given these contradictions, it is unclear how well analyzed the cause of the spills is—it appears unreliable for purposes of DEP’s analysis.

3. Sunoco persists in making contradictory claims about the capabilities of conventional auger boring.

Sunoco again has made claims regarding the capability of conventional auger boring that contradict its previous statements about the technology. While Appellants agree that conventional auger boring is inappropriate for this site given the linear distance of the wetlands that need to be crossed, the Department must not let Sunoco base its Alternative's Analysis on statements that are inaccurate or contradictory.

The Report says that "conventional auger bore is technically limited to 200 linear ft. at a time varying by the underlying substrate." Sunoco's Trenchless Construction Feasibility Analysis states at Section 4.1.2, however, that "the current maximum extent for a CAB installation of a 16" or 20" diameter pipeline is approximately 390 feet." See

<http://files.dep.state.pa.us/ProgramIntegration/PA%20Pipeline%20Portal/MarinerEastII/Cambria/11%20-%20EAF/Encl%20E%20-%20Comp%20Env%20Eval/Part%203%20-%20Alternatives%20Analysis/Appendix%20B%20-%20Trenchless%20Feasibility%20Analysis%20%202016-11-29-FINAL.pdf>. And Sunoco has elsewhere in a letter to the Department dated August 24, 2018 stated "conventional auger bore is technically limited to less than 300 linear ft of relatively flat land surface at a single attempt." Which one is it? If Sunoco does not understand the technical limitations of the technology it uses, it is no position to decide which alternative presents the best course of action for the Site, and it cannot be trusted to proceed safely.

4. Sunoco has not offered water testing associated with the construction of the 16-inch pipeline.

The Report indicates Sunoco's outreach to landowners in the vicinity of this HDD — which consisted of sending letters, not door-to-door surveys—took place in February 2018, in preparation for construction of the 20-inch pipe. In January 2019, subcontractors "researched" private water supplies located within with 450 feet of the HDD alignment, but there is no indication contact was made with landowners to ascertain details about their water supplies or to offer water supply testing. Drilling for the 16-inch line presents a new set of risks, separate from the risks associated with the construction of the 20-inch line, and the Department must not allow Sunoco to shortcut water testing protocols. Even if the water testing done in 2018 serves as baseline testing, it does not stratify the requirement of the Order that testing be offered during and after construction. Sunoco must make renewed efforts to contact landowners, offer testing as required, and document these communications.

Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site. (1-5)

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