

May 10, 2019



By Email

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Re: Comments on PA-CU-0176.0019-RD-16 (HDD# S2-0247)

Dear Mr. Williamson,

On May 3, 2019, Sunoco submitted a letter to the Department in response to the Department's April 22, 2019 request for additional information regarding horizontal directional drilling ("HDD") Site PA-CU-0176.0019-RD-16 ("Site"). 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"), we respectfully submit these comments in reply. These comments address Sunoco's response point by point for the first three points.

1 & 2. Use of the 20-inch drill history for the re-evaluation

While Sunoco provides useful description of what happened during the 20-inch drill (though still fails to include the requested "magnitude of the IR(s) and associated loss of circulation"), it still does not meet the requirements of the Order that that information be used for the re-evaluation. How was it that the lessons learned from the 20-inch drilling process were used in formulating the re-evaluation proposal? Sunoco says it increased the depth of the drill to be advanced through more competent bedrock--but bedrock that may still be broken.

But, as with *every other re-evaluation* that proposes a deeper drill, Sunoco has provided no insight into why it chose the given depth. Why drill in bedrock that may still be broken? What advantage is there to choosing that particular depth? These very basic questions are unanswered here and elsewhere. Since Sunoco is stonewalling on this question, Occam's Razor would suggest that the choice of this depth is unscientific--that there is no answer to provide.

The Department should demand more of Sunoco than this, to ensure that it is choosing the best of the alternatives, not just a different option.

3. Predictions of troublesome intervals

The Department asks Sunoco to "attempt to predict" what intervals or areas may require changes in the drilling plan or "increased vigilance." Once again, Sunoco does not comply with the

request. It fails to identify a single such interval, instead saying that it will identify such intervals internally at some point in the future. Of course, it wants approval from the Department *now*, based on trust it has not earned. An old cartoon character famously took this approach, proclaiming, "I'd gladly pay you Tuesday for a hamburger today." The Department should not let Sunoco sidestep its questions so easily.

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

Sincerely,

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