

June 15, 2019



By Email

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Re: Sunoco's response to the Department's request for information for HDD PA-CU-0136.0002-WX-16 (HDD# S2-0210-16)

Dear Mr. Williamson,

On March 19, 2019, the Department requested additional information from Sunoco regarding its reevaluation ("Report") of the horizontal directional drilling ("HDD") indicated by drawing number PA-CU-0136.0002-WX-16 (the "HDD Site"). Sunoco responded to the March 19, 2019 letter on June 8, 2019, supplementing the Report. 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 regarding Sunoco's June 8, 2019 supplemental response ("June Supplement"). They are numbered to correspond to the numbering in the Department's requests and Sunoco's responses.

1. Justification of Drilling Path

The Department asked, among other things, how Sunoco used the geologic data gained from the drilling of the 20-inch pipe in its redesign of the 16-inch pipe drill. Sunoco provides more information and writes in particular that it has steepened the entry and exit angles and deepened the drill profile. Sunoco also writes, "The RQD values for the 20-inch profile were generally considered good; however, to further reduced [sic] the potential of IRs during the installation of the 16-inch HDD, the profile was designed to intersect more competent bedrock and avoid intervals of bedrock which contained multiple fractures as identified in the 2017 geotechnical investigation."

The actual planned depth of the 16-inch line is not much increased as compared to the as-built 20-inch line, probably because Sunoco undertook similar measures to steepen and deepen that line from the initial plans. It is unclear whether the additional 20 feet or so will change the outcome, and Sunoco's response to the Department's question does not add clarity there. Moreover, it is a mystery how Sunoco designed the planned profile to "avoid intervals of bedrock which contained multiple fractures as identified in the 2017 geotechnical investigation." The plan view and profile view show that the 16-inch parallels the as-built 20-inch, differing from it only slightly in horizontal location and in depth.

As Appellants noted in their initial comments, lengthening the profile should be considered to allow a larger difference between the failed 20-inch installation and the planned 16-inch installation. Sunoco still does not discuss this option.

2. Drilling intervals requiring increased vigilance

The Department asked for “discuss[ion of] any drilling intervals along the proposed 16-inch drill path where increased vigilance may be warranted.” Sunoco responds that such areas will be identified. This is non-responsive. Sunoco earlier writes that such areas *have* been identified and, for example, “the profile was designed to ... avoid” such intervals. Sunoco’s response to Item 2 casts doubt on whether they actually have been identified and whether the profile has been designed to take them into account. It should not be hard to state where they are to the Department.

4. Pipe Stress Allowances

The Department asked for “further explanation of how the following statement [on pipe stress allowances] applies to *this* HDD re-evaluation.” (Emphasis added). Sunoco spends most of a page describing in general terms the theory of pipe stress allowance in pipeline design without mentioning this HDD re-evaluation. Then it appends a pro forma statement that could apply to literally any of its HDD re-evaluations: “All of the information and the stress assessment procedures above are incorporated into the profile design and implemented in analysis of the drilling profile to ensure the integrity of the pipeline as installed.” How so? Sunoco does not explain.

None of the information Sunoco provides is specific to this HDD re-evaluation. Sunoco knows how to provide a responsive answer, as it does so in the final substantive paragraph of its June 8, 2019 letter in response to the Department’s comment on HDD S3-0110-16 in Lebanon County. Sunoco could have and should have provided a response like that, but tailored to this Site. The Department should request that of Sunoco.

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

Sincerely,

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