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By Email

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Re: Comments on Report for HDD PA-LE-0117.0000-WX-16 (HDD# S3-0110)

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-LE-0117.0000-WX-16 (the “HDD Site”).

1. The changes Sunoco proposes are inaccurately and inadequately explained, and there is no analysis showing they would be effective.

The major changes in the proposed revised drill are to deepen the 16-inch profile by nine feet out of seventy-some feet and to lengthen it by about 200 feet. *Compare* Figure 1 and Figure 2. Both the “before” and “after” plans have the depth of the borehole straddling the top of the bedrock. The Report also states that “the entry and exit angles [have been] increased to minimize drilling time while entering or exiting the profile.” According to maps presented as Figure 1 and Figure 2, the angles remain exactly the same. The Hydrogeologic Report acknowledges this: “The inclination of the eastern and western entry/exit angles has remained unchanged.”

The Department should inquire of Sunoco why it is proposing barely changing the depth of the profile. It is strange that Sunoco would propose drilling the pipe at roughly the top of the bedrock instead of firmly embedding it in the bedrock. No explanation is given for why.

The Department should also inquire why Sunoco is *not* proposing to increase the entry and exit angles “to minimize drilling time while entering or exiting the profile.” Arguably, the lengthening without steepening of the profile is just moving the “punch-out” zone east rather than shortening it.

2. The HDD is sited in a very sensitive wildlife area requiring coordination with other agencies and special precautions.

As the Report notes, “The entire HDD alignment is located on State Game Land 46, also designated as the Middle Creek Wildlife Management Area.” In particular, this is within the Propagation Area, which has particularly restricted access. *See* <https://www.pgc.pa.gov/InformationResources/AboutUs/ContactInformation/Southeast/MiddleCreekWildlifeManagementArea/Documents/Middle%20Creek%20Wildlife%20Management%20Area%20Map.pdf>. The Game Commission explains, “A 756-acre wildlife propagation area has been set aside as a sanctuary for nesting waterfowl and other animals. No hunting, fishing or any other activity is allowed in this area. Mounted yellow signs and wire connecting each post designate the propagation area.” *Id.* The Department should coordinate with the Game Commission to ensure that Sunoco’s plans for the site do not conflict with its license agreement with the Game Commission and they minimize the harm to nesting waterfowl and other animals in the sanctuary area. The Department should also coordinate with the U.S. Fish and Wildlife Service to ensure compliance with Sunoco’s Migratory Bird Conservation Plan vis-à-vis the Middle Creek Wildlife Management Area.

3. The geophysics Sunoco performed has not informed its redesign of the 16-inch HDD.

Sunoco did geophysical surveying at the site in January 2019, after it had already finalized its 16-inch HDD profile, the design of which was changed in December 2018 per Figure 2. Very little is said about the geophysical surveying besides the most high-level summary, and none of the survey results are shown. The Report states: “Results from the geophysical techniques are consistent with each other, and with the geology as mapped by the PA Geological Survey; all suggesting that the local bedrock is mildly fractured, with a few potential anomalous zones of concern.” What are these potential anomalous zones of concern? If they are concerning, why are they never again discussed?

These are not the only zones of concern noted in the Report. It writes: “The site geology for the redesigned 16-inch HDD profile is mapped west to east as the Triassic age Hammer Creek Conglomerate (Trhc) and the Hammer Creek Formation (Trh). The contact between the two runs along a section of the proposed HDD profile near T307.” Zones of contact between geological formations are more likely to bear pathways for fluid transmission, such as in the Lisa Drive area in West Whiteland Township, Chester County. Again, however, Sunoco gives no indication that it will bear this contact zone any more mind as it prepares to drill the 16-inch pipe.

This lack of disclosure about the geophysical survey results is troubling. More troubling still is that they were done apparently as an afterthought, did not inform the profile redesign, and do not appear to have informed anything else in the re-evaluation. The Department should require Sunoco to disclose the full survey results and explain how it will use those results to reduce the risk of environmental harm at this site.

4. The Report appears to not comply with paragraph 5.i of the Order requiring that it “document in detail the information considered for the re-evaluation of the design of the HDD.”

The Report states: “SPLP possesses a complete geologic profile from the drilling of the 20-inch pipeline and vertical geotechnical data. No additional information is needed to evaluate the HDD for the 16-inch pipeline.” If that is the case, then the Report does not comply with the Order, which specifies at paragraph 5.i that “The Report shall document in detail the information considered for the re-evaluation of the design of the HDD at that site.” This “complete geologic profile” is nowhere to be found in the Report. Moreover, it does not appear to have been made available to Sunoco’s hydrogeologists, who do not describe knowing what that “full geologic profile” is.

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

Sincerely,

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