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By Email

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Re: Comments on Report for HDD PA-LE-0055.00-RD-16 (HDD# S3-0101)

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-0055-RD-16 (the "HDD Site").

Sunoco's attempts to cross Snitz Creek using HDD have resulted in more inadvertent returns than nearly any of its other many troubled HDD sites. The karst geology and highly weathered, vertically fractured bedrock made this result entirely predictable, yet it took numerous spills and an abandoned pilot hole to rethink the plans for installing the 20-inch line. Now Sunoco has proposed a deeper and significantly longer profile for the 16-inch line. The proposed changes appear to be notable improvements. Yet Sunoco's analysis of the HDD Site still lacks the thoroughness needed to ensure construction can proceed safely at this highly spill-prone site.

1. Sunoco has not fully accounted for threat to drinking water wells at this high-risk site.

First, Sunoco is unclear about the number of wells that are in the vicinity of the HDD alignment. It states: "The search identified 25 wells within the ½-mile radius of the HDD. These wells consist of 26 domestic water supply wells, one domestic recharge well and two closed-loop geothermal wells (total of 29 wells)." These numbers do not add up. The number of wells potentially at risk is the most basic of facts. Sunoco should perform a door-to-door survey of all landowners whose wells could potentially be affected by its drilling operations at the Site and accurately document that information in the reevaluation, even if that means, based on local geology, knocking on doors further than 450 feet from the alignment. Knowing which wells are at risk is the first step to ensuring they are protected and that landowners are offered water testing in accordance with the Order.

Second, Sunoco admits in the Report that no groundwater modeling was performed. The vulnerability of the geology to at this Site is not theoretical; it has been proven through Sunoco's

repeated spilling at this Site and failed drilling attempts. Given this history, additional precautions are needed to protect water resources, including groundwater. The Department should require Sunoco to perform groundwater modeling and to incorporate the results of that modeling into its reevaluation.

Third, Sunoco makes no mention in the Report of the three drinking water well complaints associated with the installation of the 20-inch line at this HDD Site. On the contrary, Sunoco claims: “No water supply well complaints were received during drilling of the 20-inch pipeline.” At best, this is a careless oversight that demonstrates again Sunoco’s prioritization of rushed construction over public safety, at worst, it is another example of Sunoco’s willful deception. Either way, understanding what happened to residents’ drinking water wells in relation to the installation of the 20-inch line is crucial to any safe and effective planning of future construction at the Site. It is suspiciously coincidental that three residents identified problems with their wells during the construction of Sunoco’s 20-inch line which also resulted in numerous spills. Sunoco’s track record of lying to the Department and the public calls into question the validity of any investigations that were performed by Sunoco. The investigations of these complaints should be revisited and given a hard look by the Department, especially to the extent the findings were inconclusive. Documentation of the investigations should also be made public for independent review. Preventing the destruction of water supplies is at the very core of this court-ordered reevaluation process and for Sunoco to act as though the well contamination complaints at this problematic site never occurred is unacceptable.

2. The geophysical studies Sunoco commissioned do not cover the correct area.

Throughout the course of planning and constructing the Mariner East pipelines, Sunoco has been highly reluctant to conduct geophysical surveying, even when directed by the Department to do so. Here, given the karst geology, the extensive spill history, and the terms of the Order, Sunoco may have had little choice but to commission geophysical surveys. Yet, despite having agreed to conduct the geophysics, Sunoco wasted the opportunity to utilize the surveys to make its plans safer.

The revised profile for the HDD is over two and half times as long as the original profile. The geophysical surveys, however, are based on just the original HDD profile and do not appear to cover the full distance of the original profile. In fact, the survey area does not even appear to have included the portion of the profile where the series of inadvertent returns occurred during the installation of the 20-inch line. This is a missed opportunity to take advantage of a powerful tool. The Department should require Sunoco to perform additional geophysical surveys and to discuss the results of the surveys in the context of the safety of its new plans. At a minimum, geophysical surveys should be conducted in the vicinity of the newly proposed location for the HDD entry, as the shallower depth of the drill upon entering is known to be a risk factor for inadvertent returns. Ideally, geophysical surveys should be conducted along the full length of the new proposed profile.

As it stands, it is unsurprising that the Report makes no meaningful use of the geophysical survey results. The geophysical surveys of the Site seem to amount to little more than a checked box.

3. The Alternatives Analysis contains contradictory statements.

Sunoco's alternatives analysis suffers from reliance on a statement that contradicts its other statements. The Report says that "conventional auger bore is generally 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?

Nor does the alternatives analysis discuss the use of "Direct Pipe," as multiple other recent re-evaluation reports have mentioned. If other potential alternatives to the revised plans were considered, it is not clear from the Report. To that extent, the Report is incomplete, and the Department should ask for a completed Report to be made available before taking any action.

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

Sincerely,

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