

August 23, 2019



By Email

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**Re: Sunoco's response to the Department's request for information on HDD PA-JU-0004.0000-WX-16 (HDD# S2-0156-16)**

Dear Mr. Williamson,

On March 21, 2019, the Department requested additional information from Sunoco regarding its reevaluation ("Report") of the horizontal directional drilling ("HDD") indicated by drawing number HDD PA-JU-0004.0000-WX-16 (the "Site"). Sunoco responded on August 19, 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 the Department's request and Sunoco's August 19, 2019 response ("August Response").

**1. The explanation of the geophysical survey results is incomplete and Sunoco has not accounted for the results of the geophysical surveys in its redesign.**

Geophysical surveying was needed at the Site to understand the location and extent of the vulnerable zones, and ultimately, to inform the redesign and avoid construction incidents. While the geophysical survey results included with the August Response are helpful, they do not provide a complete picture. Sunoco has also failed to incorporate the results into its redesign.

First, Sunoco needs to provide further explanation of its geophysical survey results to ensure they are internally consistent. The gravity results show significant mass deficits. Those areas of mass deficit do not seem to fully correspond with the areas of low velocity seismic readings from the seismic survey. For example, based on relative depths of the low velocity zones depicted in the seismic refraction profile in Figure 4: Seismic Survey Results, a significant low velocity zone is present immediately to the east of station marker 8498+00. This suggests a corresponding mass deficit should have been detected in the gravity survey at that location. However, Figure 3: Residual Microgravity Results shows no mass deficit at 8498+00. In contrast, the low velocity zone depicted in Figure 4 between stations 8500+00 and 8500+50 – which is similar in magnitude to the low velocity reading taken at station 8498+00 – *does* correspond to an area of substantial mass deficit in the gravity data. At a minimum, additional

discussion is required to explain this incongruous result. Additional seismic surveys may also be needed to resolve this discrepancy.

Second, it is unclear from the presented information how deep the area's mass deficits run. Understanding the depth of the potential fracture zones and other anomalies is key to ensuring that the 16-inch profile will be installed at the most appropriate depth. Conducting another seismic survey targeted to go deeper would likely provide the needed information.

Sunoco has suggested that it will let the contractor know about the fracture zones and increase the frequency of reconnaissance while the drill advances through the anomalies. That should be a given and is not enough. Sunoco needs to explain what it will do to avoid the anomalies and prevent a spill, not just watch for one.

Finally, Sunoco has failed to complete the crucial step of explaining how the specific path it has chosen for the redesigned profile is justified based on the geophysical survey results. Indeed, it still has not provided any data-driven justification for the particular depth at which it has proposed to drill. The Department should continue to press Sunoco on this point. This Site has already been subject to a field modification that resulted in abandonment of an entry pit for the 20-inch line, which in turn, was the cause of an inadvertent return. Until Sunoco can justify its proposed drill path with specific supporting data and a full explanation of how previous incidents such as abandoning a drill pit will be avoided, its reevaluation is incomplete.

## **2. Sunoco has not demonstrated that drinking water supplies will be safe.**

Water supply testing is supposed to be conducted before, during, and after drilling. With regard to well WL-092120170614-01, Sunoco provides a summary of the results from only two of those three tests: a test conducted before the start of drilling, and a test conducted approximately three weeks after drilling for the 20-inch line began. It took Sunoco over five months to complete the 20-inch drill, thus 85% of the drilling was completed after the second test. Sunoco has provided no further data points, no post drilling test results. The two tests for WL-092120170614-01 that Sunoco summarized in the August Response do not demonstrate that the water supply was not impacted by Sunoco's operations; they do not provide enough information to reach that conclusion. Presumably, if Sunoco had conducted post-drilling testing at WL-092120170614-01 that revealed no contamination, it would have also shared those results. The public is then left to assume that Sunoco either never completed testing, or is not disclosing all results. The Department should require Sunoco to provide additional information.

In addition, while Sunoco has not explained the cause of elevated turbidity, iron, and manganese levels in well WL-01312018-619-01, it has nonetheless ruled out its own liability for the contamination. Sunoco asserts the resident's complaint was evaluated by a Professional Geologist and those conclusions were submitted to and approved by the Department. It is unclear why, when the complaint and the sampling occurred in January 2018, it took until January 2019 for Sunoco to share its investigation with the Department. According to Sunoco, the Department then concurred with Sunoco's findings just five days later. The documents associated with this investigation should be redacted as necessary to protect the landowner's identity and made part of the Report with appropriate. Importantly, all the geophysical testing that has since been conducted at the site took place months after Sunoco submitted the results of

its investigation. This newly available data could change the Professional Geologist's assessment and must be taken into account. The Department should require Sunoco to evaluate the potential for communication between the drill site and all surrounding wells, specifically discussing the geophysical survey results.

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

Sincerely,

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