

February 9, 2020



By Email

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**Re: Comments on Report for HDD PA-CH-0111.0000-RD (HDD# S3-0300-20)**

Dear Mr. Hohenstein,

On January 16, 2020, the Department requested additional information from Sunoco regarding the reevaluation report it submitted on June 20, 2019 for the Park Road Crossing Horizontal Directional Drill (HDD), indicated by drawing PA-CH-0111.0000-RD. Sunoco responded to the Department's request on February 4, 2020. 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 response.

**1. Sunoco's plan dismisses risks of drilling through low integrity rock.**

The Department rightly pointed out that Sunoco has not accounted for the likelihood of encountering poor quality, highly fractured and weathered rock at depth it intends to drill. Instead of providing the missing data, Sunoco minimizes the importance of drilling through high integrity rock, arguing it is the quality of the rock above the horizontal run, and not at the actual depth of drilling, that matters. While having a layer of high-integrity rock between the drill and the surface can offer some protection from drilling fluid reaching the surface, disregarding the integrity rock at the depth of drilling runs afoul of years of drill site reevaluations. The integrity of the rock Sunoco is drilling through has consistently been a focus of the Department and Sunoco has regularly tried to justify its plans by pointing to the integrity of the rock it is drilling through. Now, not only is Sunoco arguing that it does not matter what it is drilling through, but it has gone further, arguing that highly weathered and fractured rock may be less susceptible to IRs as sediment may have settled into the openings. Again, this stands in contrast to numerous other reevaluations which identify highly weathered and fractured rock as having an increased likelihood of contributing to IRs. Sunoco seems to be providing the rationale that is most convenient to avoid changing its plans or providing additional data, regardless of consistency.

Sunoco has also failed to discuss other risks that may be associated with drilling through low integrity rock. Even if the drilling fluid is blocked from reaching the surface, it is likely to travel through the fractures underground, interfering groundwater and drinking water supplies. As

Appellants have previously pointed out, Sunoco has failed to account the risk of groundwater discharge at this site, both in draining the groundwater that feeds the nearby stream or in running off beyond the limits of disturbance. Drilling through highly fractured and weathered rock increases the risk of encountering problems with groundwater. The Department should require Sunoco to provide a full discussion of these risks and to provide a detailed plan for preventing groundwater interference. The Department should also require Sunoco to provide a full discussion of any other risks associated with completing the horizontal run of its line in poor integrity rock, such as an unstable borehole, or additional stress on the surrounding geology as highly pressurized fluid is pumped through the fractures.

## **2. Sunoco has disregarded wetland impacts.**

The Department specifically asked Sunoco how it will prevent damage to the PEM wetland to the east of the HDD entry/exit. Sunoco's response is, essentially, that it will *not* avoid damaging the wetland; it is too late because it already open trenched through the wetland twice and the pipes are in the ground. By running the 20-inch pipe up to Sunoco's desired HDD entry/exit point before receiving approval for its revised drilling plans was irresponsible and unreasonably constrains its drilling options in the reevaluation process. Sunoco has foreclosed the possibility of making the drill longer so it can run deeper as well as the possibility of avoiding the wetland. Undercutting the reevaluation process in this way should not be tolerated, much less rewarded by approving these plans.

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

Sincerely,

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