

Uwchlan Township

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Date: 5/5/2020

Re. Uwchlan Township Comments
HDD 310 Geophysical Survey Report

In response to the PA DEP's April 30, 2020 posting for public comment on Sunoco Pipeline, L.P.'s geophysical survey report for HDD 310 in Uwchlan and Upper Uwchlan Townships, Uwchlan Township has reviewed the geophysical survey report and submits the following comments for consideration:

1. Uwchlan Township recommends that PA DEP require the design professional who is responsible for the Hydrogeologic Reevaluation report review and update the report based upon the completed Geophysical Survey. The Geophysical Survey was not complete at the time of the Hydrogeologic Reevaluation report (noted as pending in Section 2.4 - page 9).
2. Uwchlan Township recommends Sunoco be required to submit additional analysis to PA DEP prior to the removal of the casing pipe that addresses the following:
 1. Post pipe pull subsidence inspections around the casing locations,
 2. Review of any issues encountered during the pipe pull (i.e. groundwater flow-back)
 3. Ability to pull the casing without adverse effect to the installed pipe
 4. The logistics and effectiveness of providing suitable replacement materials (such as backfill soils or grout) following the casing removal.
3. Uwchlan Township recommends additional analysis be completed for the reevaluation report and the geophysical survey. The report and survey do not address the existing active 8" pipeline that is located adjacent to constructed 16" pipeline and the proposed 20" pipeline. Sunoco is very lucky the subsidence event did not impact the existing active 8" line and it is important to evaluate need for this line to be shut down during the HDD process or at least when the casing pipe is proposed to be removed. The Geophysical Survey exhibits do not even note the location of the existing 8" pipeline.

4. Uwchlan Township recommends that additional work be completed for the Geophysical Survey. The limits of the survey do not correlate to the limits of the HDD for the 20" pipe at the entry and exit locations (due to fact areas were inaccessible due to ground mats, construction equipment, and drilling activities. It is important to complete the survey in the area of the proposed work to determine if any areas of concern are noted.

Please do not hesitate to contact me at 610-363-9450 if you have any questions, or need any clarification on the comments above.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Greenly". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Scott Greenly
Township Manager
Uwchlan Township