

December 31, 2019



By Email

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Re: Comments on Report for HDD PA-CH-0290.0000-RD (HDD# S3-0421)

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-CH-0290.0000-RD (the “Site”).

1. Sunoco has not adequately addressed the risk of or impacts associated with groundwater discharge.

Tens of thousands of gallons of groundwater were discharged during the drilling for 16-inch line at the Site and Sunoco acknowledges that its drilling of the 20-inch line is also likely to result in groundwater discharge. Despite this known risk, Sunoco has not provided any analysis of how groundwater discharge at the Site has already impacted or could impact the water table. Instead, Sunoco seems to merely rely on its assertion that there were not well complaints during the drilling of the 16-inch line. The Department should ensure that Sunoco incorporates into the Report a full analysis of how Sunoco’s construction has impacted groundwater at the site and how its proposal for the 20-inch line might impact groundwater going forward. This analysis should include a discussion of the how Sunoco’s drawdown of the water table might affect water supplies. There are two private wells in close proximity to the proposed alignment and Sunoco admits that “the elevations of the open rock groundwater production zones for these wells are likely to occur at the elevation of certain sections of the HDD proposed profile.” HDD Hydrogeologic Report, at p.15. Sunoco should also provide a site-specific plan for preventing or minimizing groundwater discharge and for managing any groundwater discharge that does occur. Sunoco’s mismanagement of groundwater at other sites has resulted in wells running dry and sometimes becoming contaminated and residents’ yards being flooded.

2. Sunoco has not adequately assessed the petroleum odor at the Site.

Sunoco’s soil sampling revealed a petroleum odor but Sunoco has failed to provide any explanation of its source or associated risks. According to the Report, after identifying a petroleum odor in soil sampling, inspectors did not find a petroleum odor while drilling for the 16-inch line. Having reportedly not encountered a petroleum odor while drilling, Sunoco seems to have entirely dismissed the issue. More information is needed. At a minimum, Sunoco should investigate any history of spills at the site and include in the Report information about the nature and quantity of any pollution event. Even if petroleum-contamination was not encountered during the drilling of the 16-inch line, there is a risk that drilling of the 20-inch line, which follows a different path, could mobilize these contaminants. The risk of mobilizing contaminants is particularly concerning given the admitted likelihood of groundwater discharge.

3. Sunoco has not addressed the extent and cause of the loss of circulation that occurred during the drilling of the 16-inch line.

Drilling for the 16-inch line resulted in inadvertent returns and a loss of circulation incident. While the Report discusses the inadvertent returns, it does not provide detail regarding the LOC. The discussion of inadvertent returns is incomplete without these details. A high-volume LOC would present reason for concern and could indicate an increased risk of inadvertent returns. Currently, the Report dismisses the risk of IRs and asserts the relatively small IRs that occurred during the drilling of the 16-inch were not tied to a geologic anomaly. A high-volume LOC could change that analysis and the associated risk of IRs. The Department should require Sunoco to provide this missing information and take any steps necessary to minimize risks of future IRs or LOC.

Thank you for considering these comments. Please keep Appellants apprised of any next steps.

Regards,

s/ Melissa Marshall
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