

**DEP Permit # E06-701**  
**DEP Permit HDD Reference # PA-BR-00181.0000-RD**  
**DEP HDD # S3-0250**  
**Township – Caernarvon**  
**County – Berks**  
**HDD Site Name – Joanna Road Crossing**

**1<sup>st</sup> Public Comment Period**

<b>Commentator ID #</b>	<b>Name and Address</b>	<b>Affiliation</b>
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**1. Comment:**

I have attached my documentation and comments in regard to HDD S3-0250. I have done my best to clearly and accurately describe the past and current conditions. I look forward to learning a resolution to my well pollution issues as well as having my medical bills addressed.

I am writing to submit my comments on the Keystone Mariner East 2 Pipeline and in particular HDD No. S3-0250 Joanna Road Crossing/PA-BR-0181.0000-RD, PA-BR-0181.0000-RD-16 and PA-BR-083.0000. As I am sending this out to numerous parties let me also clarify my understanding of the afore mentioned parcels.

PA-BR-083.0000: A temporary work space adjacent to the permanent right of way measuring 75’ wide on the southeast road frontage of Joanna Road, 222’ wide

adjacent to the new pipeline right of way, 90' wide at the northwest exposure and finally 248' wide on the parallel axis of the pipeline. (Shown in Blue Crosshatch)

PA-BR-0181.0000-RD: Specifically references the 20" pipeline Horizontal Directional Drill (HDD) and subsequent pipe that is open cut laid that is also 20" in diameter.

PA-BR-0181.0000-RD-16: Specifically references the 16" pipeline Horizontal Directional Drill (HDD) and subsequent pipe that is open cut laid that is also 16" in diameter.

I would also like to lead this letter of concern with some personal background and I will try not to infuse much emotion. The land I currently reside upon, was bequeathed to me, my wife and two daughters, by my Grandfather, whom received it from his Father, whom purchased it from the Grace Mines at the conclusion of mine activities. I, after having served in the United States Marine Corps and having a tour of combat in 2005-06 Fallujah, Iraq, needed a place of rest and relaxation away from the busy life of cities and people. Being diagnosed with Hypervigilance Syndrome (a diagnosis before PTSD was associated to Iraq/Afghanistan Vets) I could no longer reside in close proximity to others as even small noises would put me in panic and protection mode. In moving to the countryside, I was able to slightly relax and not check my locks five and six times a night, or spend countless hours patrolling my property in efforts to protect my family. In a small part, in building my home here, it became my fortress of comfort, both physical and mental. The other purpose it served was to assist my Grandparents, my neighbors, in their later years in plowing snow, mowing the lawn, medical care and ultimately the end of life care necessary.

Now, on to the background of this particular project. On or about May 1, 2017 the construction activities finally began on my property. Surveyors were out, marked the Right of Way (ROW), and by early June trees were cleared and land leveled for instillation of the new pipeline. During a conversation with one of the *Welded* (company laying pipe in my area) employees I learned there were two lines to be laid. Bearing concern and contacting the *Percheron* ROW agent I was instructed to review the written portion of the easement, where I did in fact find the language buried in the contract identifying two lines not to exceed 24" in diameter. My excitement of a large check and the coxing of a smooth talking ROW agent had the agreement signed before I reviewed in full, my mistake.

I believe it was following the July 4<sup>th</sup> Holiday, if not before that the HDD rig was placed and began drilling operations. The week of July 17<sup>th</sup> I began to observe fully having gastrointestinal distress. I had frequent urges to go to the bathroom, excessive gas expulsion, and very little actually being passed. Having recently started a new position at my place of employment and it being stressful, I chalked it up to work related stress. Unfortunately, my condition did not improve over time and I soon began to pass more blood than mucus and increasingly became lethargic and fatigued.

Not knowing a cause and being fearful of reality I did not seek medical advice and hoped it would pass.

August 10<sup>th</sup> I read an article from the local *Reading Eagle* [Mariner East settlement allows drilling to resume | Reading Eagle - NEWS](#) that explained the problems that other landowners along the pipeline had experienced, and a settlement had been reached with Sunoco that included the landowner's right to have well water tested for bacteria. Working in the water industry myself I immediately recognized the potential of my condition being associated with bacterial ingestion and immediately contacted my ROW agent to request water testing be conducted on my well. The ROW agent (Scarlett Jackson) confirmed that she could schedule the testing and would be in touch with me. August 14<sup>th</sup> *GES Company*, came and drew a multitude of water samples from my well and confirmed to me that they would be running the full extent of testing required. Being in the water industry myself and capable of running bacteria tests within a laboratory at work I drew samples myself on August 16<sup>th</sup> and ran the 24 hour Fecal Coliform indicator test. My work lab returned the results on the 17<sup>th</sup> confirming an extremely high concentration of Fecal Coliform and E Coli bacteria, of which I relayed to my ROW agent. She immediately tried to set up bringing me bottled water as well as a meeting to talk with her boss, I declined both on the premise that I wanted to have the Sunoco official results first. At this time I and my family stopped using and drinking our well water for consumption purposes.

Friday August 18<sup>th</sup> Berks County was hit with a major deluge of rain. Measures of 2.0 to 2.6 inches were recorded commonly in the southern regions of Berks, my residence included. I observed a complete and total failure of all erosion and sediment (E&S) protections on my property. This included video and photos of run off waters breaching the HDD rig and washing sediment and drilling mud directly into the East Branch of the Conestoga River. Saturday August 19<sup>th</sup> workers were onsite at 6am disassembling and removing the HDD. I made contact with an employee and asked whom was responsible for reporting the E&S failures and showed him the video, he said "that doesn't prove anything" and walked away. I returned to my home and filed my own EPA/DEP violation notice. The Conestoga is a designated warm water fishery according to Chapter 93 Water Quality Standards and reviewed by W.A.V.E..

On the morning of Monday August 20<sup>th</sup> I was in contact with Berks County Conservation Officer Brian Shields whom reported to the site for investigations. The HDD rig was completely removed by the end of the day as well as E&S protections increased and partial site cleanup was conducted. August 21<sup>st</sup> I again asked to have the well testing results from Sunoco, none were available. As it had now been more than a week I attempted to disinfect my well with bleach and possibly relieve some concern. August 22<sup>nd</sup> I photographed the work site because I was concerned about the drilling fluid inadvertent returns as well as continued property contamination.

August 23<sup>rd</sup> I had finally reached my frustration point with my medical concerns. The amount of blood I was passing was now very significant and was concerning

myself and my wife whom is a Nurse. I was able to schedule an Emergency appointment with Berks Digestive Disease Associates for the following day and took a sick day from work in order to attend the appointment on the 24<sup>th</sup>. The Doctor observing no outward signs of trauma or other reason for bleeding upon physical examination and recommended I immediately schedule a Colonoscopy.

August 25<sup>th</sup> I again requested the well results from the ROW agent. Again, none were available but she did direct me to the *GES Company* whom had drawn the samples. I emailed them as well requesting results. I informed the ROW agent that if the samples had not been run by the lab yet that they have exceeded their hold times and the samples were no longer viable. I also drew another well water sample myself on the 24<sup>th</sup> and it returned on the 25<sup>th</sup> as still present with E Coli and Fecal Coliform. August 28<sup>th</sup> I again needed to take a sick day from work to have the Colonoscopy performed. The concept of needing a Colonoscopy at 35 years old is both concerning and emotionally frightening. The preparation work is emotionally and physically draining. The procedure was conducted and the Doctor informed me that she observe moderate Colitis and had taken a multitude of biopsies to rule out cancer. Cancer, at 35 I am now concerned about my life ending, my children having a father, and doubting myself as a human being in whole! My follow up appointment occurred September 18<sup>th</sup> where no Cancer was found but my Colitis may be a lifelong affliction manageable with medication and diet. Further Colonoscopies will determine follow on care.

September 1<sup>st</sup> I observed *Eichelbergers Inc.* a well drilling company out of Mechanicsburg, PA. drilling a well in the temporary right of way. I notified the ROW agent that this was not allowed by the easement agreement and that Sunoco had no mineral nor water rights within the temporary right of way. I received no response or explanation to date as to why they drilled a well there and grouted it shut after taking samples. I conversed with the workers drilling and they said they were given a stake to go drill a well at and close it up after taking samples without further explanation. (Photos attached)

September 14<sup>th</sup> I drew water samples to be run by Suburban Properties Inspections. As litigation and or definitive documentation may be necessary have independent lab results was necessary. I incurred the costs to have the tests conducted and returned on September 19<sup>th</sup> confirming the continued presence of E Coli and Fecal Coliform.

September 20<sup>th</sup> I sought Counsel and in discussing the case with an environmental lawyer I found that since I was getting better I have no recourse against the pipeline for my medical expenses which are over \$1,000 dollars now. I could get assistance in having a treatment system installed for my well but essentially there was no further recourse available to me to see damages in depreciation of property value, or follow medical costs. I was up against a Billion Dollar company who would bury me in paperwork until I got tired of fighting and there was nothing that could be done.

September 21<sup>st</sup> I received messages from the ROW agent saying that the new process for water samples required the Law Department of Sunoco to review the samples prior to releasing them to the landowner and that they need to improve their system in order to get results to the landowner sooner. Furthermore, my particular results were accidentally left on someone's desk and had not been forwarded appropriately.

September 29<sup>th</sup> completely frustrated and out of options I reached out to and was contacted back by a representative from the Clean Air Council. Kathryn Urbanowicz was able to inform me of a multitude of documentation and information that was relevant to the settlement as well as educated me of the process going forward. I received guidance on how to access the settlement documents, review plans, and what actions Sunoco should be taking going forward. I was further informed that if I had experienced a well contamination incident I should report that via DEPs reporting page, which I did the morning of September 30<sup>th</sup>.

The afternoon of September 30<sup>th</sup> I received a hand delivered copy of my initial well results drawn on August 14<sup>th</sup>. 47 days after the initial test date the results indicated that the Fecal load to my well water was 726 col/100mL, the E Coli load was 727 col/10mL and the total Fecal Coliform load was 2420 MPN/100mL. This was certainly the cause of my gastrointestinal distress as consuming contaminated water is the #1 cause of digestive complications. Furthermore, the result for these particular exams had been returned on August 15<sup>th</sup> and neither Sunoco, the ROW agent nor the Laboratory themselves notified me that my water was poisonous and a direct threat to human health and life. It is absolutely preposterous that they knew and failed to inform my household. Had we not stopped drinking the water after our own results we would have still been consuming contaminated water and everyone in the house could have likely been sick, hospitalized or in extreme case dead.

I filled a second well water complaint on the DEPs website on October 1<sup>st</sup> further indicating the exact well water test results that were obtained from the water report. I was contacted by Andrea Blosser whom provided me with information about Penn States programs on education and repair of the issue, which I have no money to obtain in either case. She also indicated she would reach out to Sunoco directly and have them specifically address my well. That has not happened to date.

In a follow up call with Kathryn Urbanowicz on October 6<sup>th</sup> she informed me that the comments were open for my particular HDD and I should already have the review in hand by Sunoco. I did not, so she provided it to me.

Now we are all caught up and below is my specific review and comments of the Sunoco Reevaluation:

First and Foremost, I disagree with the Geological and Hydrogeological findings which were presented by Sunoco, the entire region that HDD# S3-0250 passes through is extremely sensitive geology complete with a significant Karst region. The USGS in conjunction with ArcGIS data confirms these findings.

According to the USGS: “Karst is a terrain with distinctive landforms and hydrology created from the dissolution of soluble rocks, principally limestone and dolomite. Karst terrain is characterized by springs, caves, sinkholes, and a unique hydrogeology that results in aquifers that are highly productive but extremely vulnerable to contamination. In the United States, about 40% of the groundwater used for drinking comes from karst aquifers. Karst hydrogeology is typified by a network of interconnected fissures, fractures and conduits emplaced in a relatively low-permeability rock matrix. Most of the groundwater flow and transport occurs through the network of openings, while most of the groundwater storage occurs in the matrix. As a result, most karst aquifers are highly heterogeneous and anisotropic, and much of karst research has focused on developing innovative approaches for better understanding and managing these valuable water resources.”

It was identified that the use of Geophysical assessments were not preferred in this particular area. The reasoning being “results from these types of assessments have limited useable data after 20 to 50 ft below grade surface (bgs)” It is additionally noted that approximately the first 275 feet of entry boring is located within 50 feet of the surface while the exit boring has approximately 400 feet of boring within 50 feet of surface. I tend to disagree with the assessment as the use of in-depth geophysical testing will serve to expand the information acquired through the already performed geotechnical data. A combination of these assessments will expand the understanding of the subsurface conditions, soil rock interfacing, determine potential engineering constraints as well as identify the possible need for hazard analysis and risk abatement. They further can aid in a guarantee of overall project success and efficiency. I would strongly recommend the additional analysis and implementation of geophysical analysis of this particularly sensitive region of geography.

The mentioned Low, et al. report (2002) fails to identify that the HDD is situated at the confluence of 3 different geological formations. While the strongest of the three was presented in the geographical analysis, it fails to further identify the other two formations, including the Piedmont Upland and the Piedmont Lowland sections. While the Uplands has no particular interesting facts the Lowlands are underlain primarily by more easily eroded rocks such as limestone, dolostone, and phyllite. These rocks are relatively younger in age than the surrounding uplands and are likely the result of a quiet stretch of shallow sea deposition. Some of the rocks deposited during this time are also found in the Great Valley section but have been separated by the Gettysburg-Newark Lowland section. Karst terrain is problematic in this section. It should be of particular concern that the three formations are present in the area.

While not having professional training as a geologist one could look at the overall composition of the bore samples and the analysis provided therein by *Professional Services Inc.* (PSI) indicating that the bore samples retrieved from the Joanna Road Boring B-01 showed consistently, for the entire bore depth, that the composition is at a minimum “broken” and is at times “highly broken” indicating that there was a high

probability for porous rock, further indicating the possibility of Karst terrain. The data also indicates a significant amount of highly weathered rock showing significant decomposition. It is also identified that the rock quality for the entirety of the Joanna bore sample is very poor with only one sample achieving a score of poor. Also to a depth of 60 feet there was not full recovery adding to more porosity concerns.

There is also no indication as to the location of these geotechnical bores. There is no longitude or latitude indicated on the reporting. It does not coincide with the *Tetra Tech* report that indicates the location of the geotechnical survey as that report was produced in January 2016 and the bore data and photos included in the report was performed August 31-September 1, 2017. Without continuity of data it cannot be confirmed that the resulting data and subsequent report is from this area. There is also no indication as to why one drill depth was terminated at 115 feet while the other continued to 145 feet. It is also questioned how the pipeline was designed on the basis of geotechnical data that occurred nearly 18 months after the boring location plan was made and after the “pilot” hole was drilled. I fear that the geotechnical investigation was done in response to well contamination and not in conjunction with safe drilling practices.

I would next like to question the document titled “Well Location Map”. It seems on this document it has conveniently forgotten all the wells that actually fall within 450 feet of the HDD rig, it was also failed to include all but one residential well along Joanna Road that fell within the half mile loop in yellow. My personal well is approximately 324 feet from the entry point of the HDD. My well is identified on the document called “figure 3 half-mile\_wells.xls” that has coordinates but it did not make it to the map for some reason. It also failed to identify a well that is located within the temporary right of way that was at one time a property of Grace Mines and should have been identified as Historical conservation.

On to the discussion of inadvertent returns, I have substantial concerns that the pipeline has failed to report both inadvertent returns as well as E & S controls failure. As show above there has been ground spilling of an extensive quantity of drilling mud to both the ground surface as well as the waters of the Commonwealth. I have also made requests to the ROW agent to have dust abatement performed or even considered. Since the wet summer has subsided and the ground has been ground into a fine powder it has a coating on every corner of my property. I have also asked for some considerations of speed limits as pipeline employees have traveled unjustifiably fast through my back yard. I have also asked for considerations of fences to be placed on both ends of my property as the construction has “opened” my property to all manners of trespassers. I have had dirt bikes, four-wheelers, and pedestrian traffic cross my property at all hours of the day. It has taken away my sense of seclusion and security. I discussed this with the ROW agent and they offered to “increase security” in the area, I have seen none as trespassing has continued. The *Welded* and Sunoco employees as a collective have routinely violated working hours often starting just after 6am instead of the allotted 8am. They also have worked many times after 6 pm causing undue inconvenience to myself and my family.

The “pilot” drill was “successfully” operated for a distance of 805 feet without inadvertent returns but it was failed to mention the pollution of my well water as well as the inadvertent returns that were pictured above. The “pilot” drill was then completely removed in my opinion due to the notification of pollution and not due to the “HDD operators contract issues” as was told to Andrea Blosser of the DEP. The Well Water report returned to me by Sunoco was titled “preconstruction” and not mid-construction as the HDD rig had already contaminated my well. According to the Pennsylvania Constitution Article 1 Section 27 § 27: Natural resources and the public estate.

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people. (May 18, 1971, P.L.769, J.R.3)

Sunoco has denied me this right by polluting my ground water and without the assistance of the EPA, DEP, the Clean Air Council and other organizations like them, I cannot presume to have any recourse against Sunoco for their actions in polluting my well. The same section was violated a second time by Sunoco complete disregard for a Historic location. In my research I discovered that a dam and spillway was on the edge of my property and once held back waters in a pond -that was to be used to refill steam engines as they passed from the Grace Mines and into the surrounding area. The dam and pumping was conducted by a tender whom resided in a small structure with a well (still present) located within the temporary workspace. This was identified to *Percheron* very early on in the right of way purchase discussion but because as indicated in the documentation “No practical re-route option lies to the north or south” Sunoco has robbed myself and future generations from the ability to observe a historical location, its function and designated use.

Sunoco and associated contractors have shown a consistent and blatant disregard for the health and welfare of landowners across the entire route of their pipeline. In Whitehall, Chester County 14 residential wells were damaged, in Morgantown, Berks County my well was polluted, in West Cornwall Township, Lebanon County pollutants are now being discovered in residential wells. When will it stop or when will Sunoco be held accountable for their actions? Does someone need to die before the DEP or EPA step up and act to protect the interest of landowners? I have contacted Senators, Representatives, County Commissioners, and talked to about anyone who I could to seek answers to my questions. What will happen to my well? Who will pay my medical bills? Will I ever be able to drink water in my home again? How much will my property depreciate because the well is unusable?

This is not a residence, this is a home, MY home. Somewhere I should feel safe, somewhere I should be comfortable and enjoy all that I have worked to build. Not fear that drinking the water could kill me or my children. I urge you to act accordingly to force complete disclosure and increase safety for not only my property



but for all property owners along the pipeline. The pursuit of profits by a multibillion dollar business should never come before the life of one human being.

I thank you for your time and consideration and look forward to a timely conclusion. If you need more documentation including initial well testing results from when I built my home, more pictures or videos of job site and E&S failures I can be reached via e-mail or phone. Hopefully, I have not forgotten much in my review and analysis but if anything is unclear please let me know. (1)

[Attachment – David Anspach 10-8-17 - pictures](#)

[Attachment – David Anspach 10-8-17 – settlement](#)

## **2. Comment**

Pursuant to the Corrected Stipulated Order entered on EHB Docket No. 2017-009-L on August 10, 2017 (“Settlement”), 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 numbers PA-BR-0181.0000-RD, PA-BR-0181.0000-RD-16 and PA-BR-0183.0000 (the “HDD Site”).

### **The Department’s Review**

Pennsylvanians rely on the Department of Environmental Protection to protect them from dangerous activities that threaten their air, water, land, and health. The Department has recognized that the construction of Mariner East 2 has done damage to the public already. The purpose of Sunoco’s re-evaluations of certain HDD sites is so that it does a better job avoiding harm to the public and the environment in its HDD construction. The Department’s role is to review and assess Sunoco’s Report before deciding what action to take on it.

It is the Department’s duty to review and assess the Report with protecting the public and the environment placed first and foremost. Looking at the individual circumstances at the site in question is key. Critically important is accounting for input from those who live nearby, who have a deeper connection with and greater knowledge about the land than the foreign company building the pipelines through it.

A meaningful, objective and substantive review and assessment by the Department will ensure that new or further HDD operations at the re-evaluated sites will cause minimal, if any, harm to the public and the environment. Anything less than a full, careful, and objective review would endanger the public and the environment. Pennsylvanians place their trust in the Department to do a thorough, science-based assessment, taking into account these and other comments, and approving Sunoco’s recommendation only if it would protect the public and the environment from any further harm.

**Comments on Report for HDDs PA-BR-0181.0000-RD, PA-BR-0181.0000-RD-16 and PA-BR-0183.0000 (SPLP HDD# S3-0250)**

**1. Sunoco cannot be allowed to continue drilling when it has not addressed the serious harm to the public that has already occurred at this site.**

Sunoco's re-evaluation entirely neglects to mention that there has already been severe contamination of a private water supply at this drilling location. The moving and deeply troubling account of the contamination of David Anspach's well, as shared in his personal comment on this re-evaluation, should give both the Department and Sunoco great pause. The extreme levels of bacteria in Mr. Anspach's previously safe drinking water well—which is only a couple hundred feet from the HDD alignment—appeared only after Sunoco began drilling. His health has been seriously compromised. Yet Sunoco has not so much as verified the location of Mr. Anspach's well in its Report.

The harm that Mr. Anspach has suffered is exactly the sort of harm that the re-evaluation process is designed to prevent. By failing to fully analyze what happened to Mr. Anspach's well, Sunoco would be putting other members of the public at risk if it continued drilling. It is incumbent upon the Department not to allow drilling to continue at the HDD Site until it completes its own investigation of Mr. Anspach's well, or, alternatively, requires Sunoco to provide a complete and accurate analysis of the contamination event, and then independently verify that analysis.

**2. Sunoco failed to do a competent survey of water supplies.**

The contamination of Mr. Anspach's well makes Sunoco's consistent failure to identify and verify locations of water supplies particularly egregious here.

Sunoco's permit applications made clear that its methodology for identifying water supplies was limited to: (1) looking up information in Pennsylvania Department of Conservation and Natural Resources' Pennsylvania Groundwater Information System (PaGWIS); (2) accessing public water supply system information; and (3) "water supply data acquired from landowners during the pipeline easement negotiations." See Water Supply Assessment, Preparedness, Prevention and Contingency Plan at §§ 4.0-4.2. It restricted its PaGWIS search to within 150 feet of HDD alignments.

As an initial matter, Sunoco is well aware of the inaccuracy of PaGWIS, and has admitted as much at page 2 in its Water Supply plan. Moreover, it is woefully incomplete—so much so that Sunoco only identified 22 wells within 150 feet of the HDD alignments across the entirety of the state, fewer than the number of water wells Sunoco has contaminated so far.

Much of the damage done to water supplies has been outside the 150-foot radius from the HDDs. As part of the settlement, Sunoco is required to, among other things: "send a copy of the Report (by U.S. Postal Service Certified Mail and First Class Mail) to all landowners who have a private water supply that is located within 450 feet of the HDD addressed by the Report."

While Appellants are not saying that Sunoco failed to contact each such landowner, if it did so, it seems to have failed to then simply ask the landowners whether they had any water supplies that might be impacted by the HDD, and the nature of those supplies. That information is not in the Report.

The Report makes clear that Sunoco merely used PaGWIS plus visual observations to identify additional wells out to 450 feet from the HDD alignment. There is no excuse for Sunoco failing to ask landowners it already had to contact whether they have water supplies and what is the nature of their water supplies and groundwater.

Because Sunoco has failed to identify the water supplies and the nature of the water supplies and groundwater near the HDD Site, it cannot determine whether any hydrogeological interference caused by the HDD would put those water supplies at risk. Without that information, the Department cannot approve Sunoco's proposal.

**4. The drilling techniques discussed in the conclusion are simply a recitation of existing normal techniques, not a solution to the problems Sunoco has been having.**

At the end of its re-evaluation, Sunoco ultimately concludes that it should continue with horizontal directional drilling and that using best management practices will adequately mitigate risks. It is unclear which, if any, of these practices have already been used at this site and other sites, and what their success has been to date. It is unsettling to think that Sunoco would require a Board order to decide to implement best management practices that Sunoco deems necessary to mitigate the risks associated with HDD. And if Sunoco is already utilizing these practices across the HDD Site, clearly they have not worked, as there have been over a hundred inadvertent returns and, at the HDD Site, water supply contamination. The Department needs details about how this best management practices have been utilized and what would make them effective at the HDD Site.

**Conclusion**

The Department cannot responsibly allow drilling to continue at this site without first thoroughly investigating the water supply contamination that has already happened there, requiring all private water supplies locations be identified and verified, and more details are provided regarding best management practices.

Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site. (2-6)

Letter – [Clean Air Council – 10-19-17 – Joanna Road Crossing](#)