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Senate of Pennsylvania
November 22, 2017

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West Chester

Ms. Karyn Yordy
Executive Assistant, Office of Programs
Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Dear Ms. Yordy,

Please accept the following comments in response to the HDD Reevaluation Report submitted by Sunoco Pipeline, L.P. for DEP Permit number E15-862, HDD Reference number PA-CH-0212.0000 filed on November 8, 2017.

Following my review of this report, I have a number of significant concerns related to the stated environmental and quality of life impacts for citizens in West Whiteland Township. In this report, Sunoco is seeking to modify the approved permit plan that utilizes Horizontal Directional Drilling (HDD) techniques and implements open cut trench crossing and four conventional drill bores. The justification for this change was based on information provided by Groundwater & Environmental Services, Inc. (GES) in their November 7, 2017 HDD Hydrogeological Reevaluation Report.

To begin, the recommendations by GES in the report only address previously approved HDD construction methods and not the environmental impacts associated with open cut techniques and four conventional bores. I understand that GES was limited here by the scope of their work. However, open cut construction techniques will result in significant impacts to my constituents in terms of personal property, commercial opportunity, and environmental conditions throughout the dense economic and residential Exton region and I must strongly request that public meetings be held prior to consideration of this modification.

The GES report also indicates, in the form of a disclaimer, that they relied on data provided by Sunoco contractors including, but not limited to, "the selection and number of

locations of borings, determination of surface elevation, target depths, observation of rock cores during drilling operations, or preparation of boring logs.” This disclaimer is not present, so far as I can tell, in the other report related to my district. What is different about this location and how does it affect the recommendations provided by GES?

Furthermore, I have serious concerns related to the number of known and unidentified sinkhole locations along the proposed pipeline route and request that DEP require Sunoco to fully investigate the possibility of sinkhole disturbance along the route prior to consideration. The karst formation in this region was a known quantity before construction, yet the original plan was approved anyway. We need better answers this time.

Finally, while Sunoco claims that the proposed change will eliminate any risk of impact to private or public wells, I must take this opportunity to remind the Department that in the original permit application, Sunoco stated they would not impact wells using HDD techniques. While the Department did call attention to this incorrect statement in the Technical Deficiency notice dated September 6, 2016, the data provided by Sunoco related to private wells was ultimately inadequate and resulted in private wells being rendered unusable. I strongly recommend that DEP not simply take Sunoco at their word that private and public water will remain unaffected and that the Department require Sunoco to provide detailed information that ensures these resources remain protected.

While Sunoco has gone through the motions of reevaluation, it is clear that the information provided is insufficient. It is my strong recommendation that the Department reject this report as incomplete, call for significant public involvement and participation, as well as require Sunoco to perform complete impact evaluations to ensure construction activities do not cause permanent and irreparable harm to the environment and citizens in West Whiteland Township.

Sincerely,



Andrew E. Dinniman
State Senator – 19th District