

November 11, 2017

By Email

ra-eppipelines@pa.gov



**Re: Sunoco's Responses to DEP's second request for information for HDDs PA-CA-0047.0000-SR and PA-CA-0047.0000-SR-16.**

Dear Ms. Drake:

On November 7, 2017, Sunoco submitted a letter to the Department in response to the Department's request for additional information regarding a horizontal directional drilling site, HDDs PA-CA-0047.0000-SR and PA-CA-0047.0000-SR-16. 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 in reply.

Sunoco states that it has sent "10-day notice letters" to four nearby property owners and has not heard a response from them. Sunoco's suggestion is that this constitutes due diligence for gathering information about the water supplies near the HDD Site in order to satisfy the requirements of the Corrected Stipulated Order that "analysis of well production zones" be done and water supplies otherwise be protected. That minimal effort is not sufficient.

Sunoco's 10-day notice letters offer water supply testing and ask for information about water supplies "to assist with" the water well testing process. For landowners who are not interested in water well testing, or may be skeptical of Sunoco's intentions, there is nothing in the letter to indicate that providing Sunoco information will assist with the re-evaluation process to potentially better protect their water supplies. Nor does the letter ask for pertinent water supply information besides well location, such as well depth and productivity.

On the other hand, Sunoco has hired an army of land agents to assist with its right-of-way needs. It is strange that Sunoco has not taken the simple step of knocking on doors to explain the re-evaluation process and ask for water supply information to assist with that process.

Appellants urge the Department to require Sunoco to do its due diligence in determining the water supply information needed to do the Board-ordered "analysis of well production zones," and not merely rely on the mailing of letters that were written for another purpose and are not designed to elicit the needed response.

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

Sincerely,

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