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By Email

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Re: Comments on Report for HDD PA-DE-0104.0008-WX (HDD# S3-0631)

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-DE-0104.0008-WX (the “HDD Site”).

1. Sunoco has not provided an adequate plan for avoiding and mitigating geologic risks.

At least six inadvertent returns occurred during the installation of the 16-inch pipe at this site. In addition, Sunoco experienced a massive loss or circulation incident, never recovering 10,000 gallons of drilling fluid it lost underground. The IRs resulted in discharges into nearby storm drains and streams and containment efforts required structures that reached the brink of impeding stream flow. The geophysical surveys Sunoco commissioned confirmed several zones along the path of the proposed 20-inch line will make the new plans vulnerable to IRs, despite the redesign. Specifically, the surveys suggested that fractures and low velocity zones could continue deep into bedrock, where they could be intercepted by the new profile.

The Hydrogeologic Report acknowledges these risks, noting in particular:

- Seven fracture traces that cross the alignment, two of which intersect in the vicinity of the May 2017 IRs.
- Low-velocity bedrock zones identified by the geophysical survey performed by Tetra Tech.
- A relatively thick saprolite and weathered bedrock zone (up to 45 feet deep) that can be overcome by drilling fluid pressures where overburden is thinning near the entry/exit points.

In order to address these risks, the Hydrogeologic Report concludes: “The drilling plan should address these potential areas of LOC and IR risk by specifying the best management practices that will be utilized to control drilling fluid pressures *in each potential situation.*” (emphasis added.) Sunoco has failed to heed this recommendation. The best management practices it

describes in its summary are the same best management practices it has listed time and again in other reevaluations. They are not site-specific, and certainly do not provide a plan for each problem zone that has been identified along the path of the present redesign. The Department should require Sunoco to heed the advice of its own hydrogeologists. Sunoco must provide a plan for addressing each anomalous zone.

In addition, given the continued risk of IRs, Sunoco should develop and implement an enhanced monitoring plan for the surrounding area so if IRs do occur, they can be identified and addressed as quickly as possible.

2. Sunoco has not addressed risks to and associated with nearby sanitary sewer lines.

Sunoco asserts that the root cause of the IRs that occurred during the installation of the 16-inch pipe was fracturing in the bedrock, which may be attributable in part to the previous blasting and excavation that was conducted to install nearby sewer lines. Though Sunoco acknowledges the presence of sewer lines and expects their installation has had impacts on the permeability of the surrounding geology, it does not bother to assess the impacts Sunoco's further disruption of the Site will have or has had on the sewer lines.

Based on resident reports, it appears Sunoco may have struck a sewer line during the installation of the 20-inch line in the vicinity of Judy Way. Sunoco does not describe any such incident in the Report, but it does describe Sunoco's contractor monitoring the installation of a new sewer line in October 2017. The installation of the new sewer line corresponds with a lengthy, unexplained gap in Sunoco's installation timeline. The Report describes HDD at the Site starting in March 2017 and encountering a series of problems over the next few months. The borehole was then grouted on June 17, 2017 and allowed to cure for two days, with drilling resuming June 19, 2017. The next data point on Sunoco's construction timeline for the Site is pipeline pullback on 3/18/18, 272 days later. Appellants are aware of two orders that halted drilling during that period: The Order cited above, which halted drilling July 25-August 10, 2017 (16 days); and the Department's suspension of permits that was in effect from January 3-February 8, 2018 (36 days). It is unclear what was happening for the other 220 days of construction and why the process took so long, especially since the Report does not describe any incidents happening between June 2017 and the March 2018 pullback. Especially given the timing of the sewer line's installation, it is important that the Department inquire as to any incidents related to the sewer lines and any relationship between Sunoco's construction at the Site and the installation of a new sewer line.

Regardless of whether Sunoco in some way impacted a sewer line during the installation of the 16-inch line, Sunoco still needs to ensure that its installation of the next pipeline will not pose a threat to the sewer lines. Sunoco has provided no discussion on this point and should be required to do so.

3. Sunoco has not provided an explanation for why it installed the 16-inch line in the alignment originally planned for the 20-inch line.

According to the Hydrological Report, "It should be noted that the 16-inch line was installed along the originally planned alignment for the 20-inch line (S3-0631)." Sunoco never bothers to address this noteworthy point. Why was the 16-inch line installed in the alignment that had been planned for the 20-inch pipe? Whatever the reason for Sunoco's change of course, it needs to explain how the redesign accounts any factors that triggered the change. The Report presently

gives no reason to trust that Sunoco's failed attempt to install the 20-inch line at the Site will be any different this time around. Curiously, the Hydrogeological Report also notes that "[t]he changeover for *all* active drilling locations in Spread 6, from the 20-inch line to the 16-inch line, was on 11/1/2017" (emphasis added). This is the first reference Appellants have encountered regarding a whole-cloth switch of pipeline installation order in Spread 6. While Appellants recognize that this change may not be related to the geology or other site conditions, that cannot be ruled out without Sunoco providing an explanation.

4. The Report lacks basic information and analysis regarding water supplies.

Sunoco has identified two private water supplies within close proximity to the proposed drilling alignment. It has offered no plan for protecting these water supplies or analysis of the well production zones that supply them. This is a recurring problem with Sunoco's recent reevaluation reports, which the Department has responded to by pressing for more information. The Department should require Sunoco to provide additional information regarding water supplies here as well, including details regarding water testing requests and results, an analysis of the well production zones, a plan for protecting these water supplies, and a commitment to conduct testing in association with the installation of the 20-inch pipe.

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

Sincerely,

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