

April 7, 2018

By Email

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Re: Sunoco’s Response to DEP’s request for information on HDDs PA-CA-0016.0000-RD and PA-CA-0016.0000-RD-16

Dear Ms. Drake,

On March 30, 2018, Sunoco submitted a letter to the Department in response to the Department’s February 16, 2018 request for additional information regarding horizontal directional drilling (“HDD”) Site PA-CA-0016.0000-RD (“Site”). 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”), we respectfully submit these comments in reply.

Identification of domestic water supplies within 1000 feet of HDD Alignment

The Department requested information regarding Well ID 81647 which PaGWIS indicates is 333 feet north of the HDD. Sunoco has confirmed that the well does not exist on the parcel where PaGWIS mapped it. Sunoco should also ensure that Well ID 81647 is not on a neighboring property. Sunoco has concluded that the PaGWIS data is inaccurate with regard to this well, but that does not mean the well does not exist. Wells are often plotted incorrectly in the PaGWIS system but exist nearby. If this well is located, Sunoco must also provide an analysis of the associated well production zone.

Subsidence from underground coal mining

Appellants continue to have concerns over the impacts subsidence might have on the pipelines at this Site despite the signed, sealed engineering report. Sunoco’s engineers have concluded that “if the estimated subsidence does occur in the future, the resulting stresses within the HDD pipes will still be within the design tolerances of the pipelines.” Sunoco’s engineers go on to explain, though, that the modeling used to estimate strains and subsidence has only been proven valid within 10 feet of the surface, not at the intermediate elevation between the mining horizon and the surface, i.e., at the depth of the HDD profile. To ensure these pipelines can operate safely

and their integrity will not be compromised by future subsidence, calculations should be based on a verified model, or appropriate surveys should be conducted.

Thank you for considering these comments.

Sincerely,

s/ Melissa Marshall, Esq.
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