

**DEP Permit # E65-973
 DEP Permit HDD Reference # PA-WM1-0111.0000-RD
 DEP HDD # S1B-0260
 Township – Penn
 County - Westmoreland
 HDD Site Name – Gombach Road Crossing**

2nd Public Comment Period

Commentator ID #	Name and Address	Affiliation
1	Melissa Marshall, Esq. P.O. Box 408 1414-B Indian Creek Valley Road Melcroft, PA 15462	Mountain Watershed Association
2	Aaron J. Stemplewicz, Esq. 925 Canal Street 7 th Floor, Suite 3701 Bristol, PA 19007	Delaware Riverkeeper Network
3	Joseph Otis Minott, Esq. 135 South 19 th Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
4	Alexander G. Bomstein, Esq. 135 South 19 th Street, Suite 300 Philadelphia, PA 19103	Clean Air Council
5	Kathryn L. Urbanowicz, Esq. 135 South 19 th Street, Suite 300 Philadelphia, PA 19103	Clean Air Council

1. Comment

On June 9, 2018, Sunoco submitted a letter to the Department in response to the Department’s June 8, 2018 request for additional information regarding horizontal directional drilling (“HDD”) Site PA-WM1-0111.0000-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.

Despite Sunoco’s disagreement, the Department is correct in that the information upon which the re-evaluation is based is to be included in the re-evaluation report. Specifically, the Order states at Paragraph 5.i. that “The Report shall document in detail the information considered for the re- evaluation of the design of the HDD at that site.” The seismic data is such information, and hence is to be included.

Appellants disagree that the location of the Mariner East 1 pipeline is confidential security information under the Public Utility Confidential Security Information

Disclosure Protection Act. The claim is specious. In the re-evaluation report, Sunoco prominently displays in the Plan View and in the Profile View of the proposed FlexBor “Existing Sunoco 12” pipeline.”

It is unclear why Sunoco wants to withhold from the Department and the public the raw 3D seismic data. Appellants are concerned that it is because of what the data would reveal.

By the nature of the Department’s response, Appellants are concerned that the only deficiency the Department sees with Sunoco’s re-evaluation report is that indicated in the Department’s letter. Appellants reiterate that despite that change from HDD to a different trenchless construction methodology, serious risks remain with the plan as detailed in the original joint comments of Appellants.

Thank you for considering these comments. Please keep us apprised of your next steps on this HDD Site. (1-5)

Letter – [Clean Air Council – 6-17-18 – Gombach Road Crossing](#)