

February 23, 2018

By Email

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**Re: Sunoco's Response to DEP's request for information on HDDs  
HDD PA-PE-0002.0000-RD & PA-PE-0002.0000-RD-16**

Dear Mr. Muzic,

On February 20, 2018, Sunoco submitted a letter to the Department in response to the Department's request for additional information regarding horizontal directional drilling ("HDD") Sites PA-PE-0002.0000-RD & PA-PE-0002.0000-RD-16 (the "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. Appellants respond specifically to Sunoco's revised well analysis of the Wildwood Family Campground water supply well and nearby wells.

Regarding the Wildwood Family Campground, Sunoco had previously stated:

The well located south of the HDD is owned and operated by Wildwood Family Campground. This well is located hydraulically upgradient of the HDD location and is outside the zone of potential effect of the HDD construction methods. Since the movement of groundwater is a subdued reflection of the overlying topography, the recharge for this well would likely derive from groundwater movement from the south, east, and west; therefore the HDD construction at 1,600 ft has no potential to affect water resources for this well.

The Department wrote in response:

The well analysis of the Wildwood Family Campground water supply well

states that “the movement of groundwater is a subdued reflection of the overlying topography”. Provide the information or data used to come to this conclusion. If information or data cannot be obtained, provide a re-analysis of the impact to the Wildwood Family Campground water supply well.

The entirety of Sunoco’s response regarding the Wildwood Family Campground well appears to be the following excerpt from the “Adjacent Features Analysis” section of its Report:

The well located south of the HDD is owned and operated by Wildwood Family Campground. This well is located 1,665 ft south-southwest of the HDD profile. This 6-inch diameter well is 141 ft deep and was flow rated by the well driller at 100 gallons per minute. This well is very distant from the HDD profile; however, considering its status as a non-public community water supply source, SPLP has requested and received permission from the owner to perform monitoring during HDD activities.

It is clear Sunoco provided neither the information it used to come to its conclusion nor a re-analysis of the impact to the water supply. Instead, it simply has permission to monitor the well. Sunoco did not even state that it *would* monitor the well during HDD activities.

The most likely interpretation of this course of events is that Sunoco had no legitimate scientific grounds for its original conclusion that the well would not be affected. It has now retracted that conclusion.

The goal here is to *prevent* contamination, not to *monitor* it, which Sunoco has not even committed to do. The public would not accept the Department allowing a permittee to damage private property and endanger public health so long as the permittee discovers when it happens.

From the onset of the re-evaluation process for this Site, Appellants have been concerned that the lack of available groundwater data, Sunoco’s refusal to conduct its own groundwater modeling, and Sunoco’s failure to analyze well-production zones, make it impossible to adequately protect water supplies near the Site. Now, upon welcome probing by the Department, Sunoco has walked back a scientific-sounding statement it made concluding that a community water supply near its HDD operations would not be affected by them. This casts doubt on Sunoco’s conclusions regarding other wells nearby. In Sunoco’s latest submission, it states the following:

On January 2, 2018, agents for SPLP investigated the two occupied properties north of the HDD location. A non-public community water well was not observed at either location. Both locations, as shown on the water supply illustration, have private wells that serve single, residential home

sites. Based upon the understanding of the groundwater levels and movement through the overburden and subsurface bedrock fissures and bedding plane partings as described in the hydrogeology report, SPLP believes that neither of these wells are within a zone of concern. Both are located upgradient and west of the valley floor; therefore, the source recharge for these wells would derive from groundwater movement from higher elevations to the west, not from the direction of the HDD profile where is crossed the valley floor.

What information does Sunoco have leading it to claim that “the source recharge for these wells would derive from groundwater movement from higher elevations to the west, not from the direction of the HDD profile where is [sic] crossed the valley floor”? Sunoco does not specify the elevation of the wells as compared to the HDD profile. And in fact, the wells are east of the western end of the HDDs. *See* Attachment 3, 450-Foot Well Survey. According to the attached well survey, the depths of these wells are 150 feet. *Id.* The western ends of the HDD profiles as revised are at elevations of 1178’ and 1175’. Contour lines from the construction plans attached to the report show elevation rising generally to the northwest, not simply west. Appellants have attached an elevation map of the region hereto as Exhibit A. The private well locations are to the immediate southwest and northeast of the pond in the center of the map. The lighter contour lines are forty feet apart in elevation. As is clear from the map, these wells are at roughly the same elevation as the western end of the HDDs—between the same two forty-foot contour lines. The depth of these wells, 150 feet, appears to be significantly deeper than the lowest point in the valley.

Therefore, without any actual hydrogeologic analysis of the well production zones, which Sunoco again and again refuses to provide, it is impossible to come to the conclusion that these wells are fed by upgradient groundwater rather than water from the ground in the valley floor. This conclusion, again, appears to simply be made up in an attempt to appease the Department rather than to do honest scientific risk analysis. Notably, these statements were not contained in the sealed hydrogeologic report.

Appellants respectfully request that the Department require Sunoco to perform an actual analysis of risk to these wells, and put in place a plan to *prevent* contamination, not just to, at best, *monitor* it.

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

Sincerely,

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# Exhibit A

