

December 27, 2018

By Email

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**Re: Comments on Report for PA-IN-0019.0000-RR-16**

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-IN-0019.0000-RR-16 (the “HDD Site”).

The revised plans for the HDD Site are an improvement over the original plans, under which installation of the 20-inch line at this location resulted in multiple inadvertent returns. Appellants remain concerned about water supplies in the area.

Sunoco indicates that it reached out to landowners within 450 feet of the HDD alignment *preconstruction* and did not get responses. It also describes having tested one well in March 2017. The timing and extent of Sunoco’s outreach should be clarified before any approval of plans for the Site. As reflected in the original Water Supply Plan, Sunoco’s preconstruction outreach to landowners was limited to residents within 150 feet of the pipeline alignment. The increased radius of 450 feet was as a direct result of the settlement reached with Appellants in August of 2017, months *after* construction (and spilling) had begun. Until that time, the 450-foot standard for outreach did not exist, and there is no reason to believe that Sunoco was implementing it. Sunoco’s assertion that it reached out to residents within 450 feet of the alignment “preconstruction” is thus very likely to be false if the preconstruction timeframe it is referring to corresponds to the single well test performed in March 2017. DEP should ensure that the required outreach has indeed taken place here and require documentation of the same, as has been done with other sites where Sunoco has submitted return mail receipts.

In addition, any water testing that took place prior to August 2017 is inadequate as the

parameters for water testing were modified in August 2017 to include bacterial testing which Sunoco had not previously been providing. Prior to approving any plans for the Site, the Department should ensure that the water testing is offered and conducted consistent the Order.

Sunoco's proposal for the Site should not be approved unless and until Sunoco fully addresses these concerns.

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

Sincerely,

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