

DEP Permit # E15-862
DEP Permit HDD Reference # PA-CH-0111.0000-RD
DEP HDD # S3-0300
Township – Upper Uwchlan
County - Chester
HDD Site Name – Park Road Crossing

1st Public Comment Period

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1. Comment

The Department of Environmental Protection's mission is to protect Pennsylvania's air, land and water from pollution and to provide for the health and safety of its citizens through a cleaner environment. Sunoco/Energy Transfer has well over 100 Notices of Violation by the DEP and hundreds of spills of drilling mud.

It is clear that this dangerous pipeline can not be completely safely and without harm to our environment. I urge the DEP to stand by its mission statement and deny any new permits at this site or for the Mariner East project. Enough is enough. (1)

2. Comment

The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and aesthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. The mariner east pipeline construction has continued to devastate Pennsylvania landscape for the past few years. It is time to shut it down preserve our environment before it's too late. I not only oppose any drilling or trenching for the Mariner East pipelines but furthermore insist this project needs to be stopped permanently. This has been over 90 inadvertent returns from HDD already and several sinkholes. Permits for any fossil fuel projects are a risk to climate change and Pennsylvania has been contributing for far too long. It's time for renewable energy to prosper in Pennsylvania.

To protect Pennsylvania's air, land and water from pollution and to provide for the health and safety of its citizens through a cleaner environment. This is the motto of the department of environmental protections, it's time to start doing what you're supposed to be doing. Please deny all permits pertaining to the Mariners pipelines, at least until the criminal charges have been processed, to remove all accountable corrupt officials. (2)

3. Comment

The Mariner East pipelines poses a severe threat (Park Rd Crossing ID S3-0300-20) to anyone in vicinity as they are virtually trapped if there is an incident. In addition, there is also a threat to natural surroundings.

This is a dangerous plan. Please do not allow it to go forward. (3)

4. Comment

A new route must be found! Drilling would begin just west of Park Road and would continue eastward under the road and the forested wetland alongside Hickory Park. A leak at the Park Road end of this stretch could leave the main facilities of Marsh Creek State Park and 200+ nearby homes enveloped in a flammable cloud. If the cloud caught fire, there would be no way out, and no way for potential rescuers to get in. My grandchildren live there!!!!

Sunoco/ET was supposed to consider alternative routes. In its new plan, it claims that “no practicable re-route option lies to the north or south.” It then observes that the route could be shifted to the north but doing that “would require consent of newly-affected landowners or the use of eminent domain/condemnation.” While that is true, it is not an excuse for failure to consider alternative routes, especially since some alternatives would provide multiple escape routes for those who would otherwise be trapped by a large leak or rupture. The DEP must insist that Sunoco consider alternatives for siting this pipeline.

In addition, the southern end of this stretch would similarly block the only road into the new Teleflex Essential Medical complex in the Eagleview business campus. I am not sure if it is fully occupied yet, but it will eventually employ hundreds. They would all be trapped in the event of a leak or rupture at the entrance to their drive.

To top it off, this route travels under (and emerges near) the wetland behind Hickory Park. There were two frac-outs there when the 16-inch line was installed, one of them in a small stream that feeds Marsh Creek Lake. Sunoco claims that only 6 gallons of drilling mud were lost, but I visited the site myself at the time and I am confident that the amount was far greater.

There are endangered bog turtles in the wetland as well, and it will presumably soon be hatching season for them. If the DEP doesn't worry about human lives, maybe it will at least take into consideration the endangered turtles. For all these reasons, a new route must be found. (4)

5. Comment

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-CH-00111.0000-RD (the “HDD Site”).

1. The revised profile may be better, but needs to be justified.

The Report indicates that Sunoco’s solution to improve the drilling plans at the Site is to steepen and deepen the drilling, and use BMPs which appear to be the same

boilerplate BMPs it uses as a matter of course. Deepening the profile may help, simply by having more overburden shielding the surface. However, the revised profile is only moderately deeper than the as-built 16-inch line. The Terracon geotechnical borings discovered highly weathered rock down to 116 feet bgs. This appears to contradict the seismic surveying, which found competent bedrock at 10 to 27 feet bgs. It is thus not clear at what depth the rock strengthens, and it is not clear that the horizontal run of the revised HDD would be located at that depth. Sunoco should justify the depth it has chosen.

While steepening the angle of entry further is likely not feasible without taking extra measures, lengthening the profile to allow for steeper entry and exit seems to be a possibility. It appears that another stretch of wetland could be avoided by lengthening the profile to the east. There is also room to lengthen it to the west. There may be reasons why this is not ideal, but Sunoco does not appear to have analyzed that alternative. The Department should require it to.

2. Sunoco must offer water sampling during installation of the 20-inch pipe.

The Report states, “With landowner permission, eight wells within and adjacent to 450 ft of the original permitted HDD profile were sampled. This sampling effort will be repeated after installation of the 20-inch pipeline is completed.” Pursuant to Paragraph 8 of the Order, Sunoco must offer water sampling during installation as well. Before approving this revised drilling plan, the Department should ensure that Sunoco will offer sampling during installation.

3. The Department should require Sunoco to generate a credible plan to handle groundwater discharge.

Sunoco should have in place a plan to deal with the expected groundwater discharge at the Site. The Hydrogeologic Re-evaluation Report states that “local groundwater levels and experience during installation of the 16-inch line indicate a risk of groundwater discharge at the northwest entry/exit. Drilling plans and Best Management Practices should account for these conditions.” Sunoco also identifies that groundwater feeds into a stream which runs into Marsh Creek. The Report, however, nowhere appears to account for the risk of groundwater discharge, both in draining the groundwater that feeds the stream or in running off beyond the limits of disturbance.

This is a consequential risk. Elsewhere in Chester County, as of this writing, Sunoco’s work is causing groundwater discharge to run across a neighbor’s yard and into a pond which it is polluting. The Department has not required Sunoco to abate the harm. That is unacceptable.

The Department cannot allow Sunoco to continue to breach groundwater and simply let it out to run outside the limits of disturbance onto other people’s property and into waters of the Commonwealth. The time to plan to prevent that is now.

4. The Department should require Sunoco to use the geophysical surveying results in planning the deepened bore.

The Hydrogeologic Re-evaluation Report states at Section 2.4, “RETTEW / Enviroscan (Rettew) completed a geophysical survey at the HDD S3-0300 site in January 2019. The purpose of the survey was to detect and delineate subsurface fracture zones that could contribute to potential IRs and/or losses of circulation (LOCs), and to determine the rock profile and rock strength for ease-of-excavation along the HDD path.” Given the Site history and geology, this appears to have been a sensible approach. However, it is unclear how Sunoco used this information for its re-evaluation. The revised proposal is to deepen the bore and use certain boilerplate BMPs. As with all of these re-evaluation reports, Sunoco does not disclose how these BMPs differ from what it did while drilling the first pipe, and thus it is unknown whether they represent an improvement.

One of the BMPs is as follows: “SPLP will provide the drilling crew and company inspectors the location(s) data on potential zones of higher risk for fluid loss and IRs, including the area related to previous IRs, and potential zones of fracture concentration identified by the fracture trace analysis, so that monitoring can be enhanced when drilling through these locations.” It would appear that Sunoco is taking into account fracture traces but not the geophysics that it specifically employed to identify fracture zones. This does not make sense. The Department should require Sunoco to use the geophysical information in its BMPs as well as the fracture traces and the locations of previous IRs.

5. Sunoco should explain why it proposes to move the centerline of the 20-inch pipe.

The plan and profile image indicates “switched 20” centerline location,” but there is no indication of why Sunoco would have moved the centerline of the planned 20-inch pipe. An explanation should be provided.

Thank you for considering these comments. Please keep us apprised of your next steps on the HDD Site. (5-9)

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6. Comment

The County of Chester hereby submits its comments to the above referenced HDD Reevaluation Report submitted by Sunoco Pipeline, L.P. Specifically the County of Chester herein submits the July 3, 2019 review comments of the County's experts McCormick Taylor. A complete copy of the McCormick Taylor July 3, 2019 review comments is attached.

The McCormick Taylor review comments are as follows:

- The Report includes a Root Cause Analysis for the 16-inch pipeline Inadvertent Returns (IRs). The Analysis characterizes the IR that occurred during the pilot phase as five gallons in volume, however, the description of this IR contained in attachment 1 (Geology and Hydrogeological Evaluation Report (GHE) Section 3.1) indicates that although approximately five gallons of drilling fluid, cuttings, and groundwater appeared at the streambank, much more fluid was contained at the location of the IR and managed for the remainder of drilling activity. The characterization of this IR as only five gallons misrepresents the effort required to contain and clean it up, and, since the GHE (Section 4.1) concludes that IRs are likely to occur in this area during installation of the proposed line, the potential magnitude of future events.
- The Report and attachments include extensive geologic analysis indicating problematic conditions that could result in IRs, with a recommended deeper alignment than previously permitted, without providing any reasoning for the recommended depth of alignment. If the presumption is that deeper is better, why not increase the depth of cover further?
- The Report addresses potential alternative alignments as unfeasible but does not address alternative entry/exit point locations. Extending the bore further southeast would presumably allow increased depth of cover from station 2+90 to 4+40, identified as a zone of bedrock weakness with a transverse fracture trace, where the IRs occurred during installation of the 16-inch pipeline.
- The proposed revised alignment parallels the completed 16" pipeline bore. The report does not address the possible loss of drilling fluid to the parallel bore's annular space where faults and fractures could allow flow to migrate. There is potential that this can result in unexpected IR events along the other bore's path.
- Noting the high probability of IRs in the vicinity of the five streams, including a Chapter 93 high quality trout stocked fishery, and Wetland C43, habitat for the Federally listed threatened Bog Turtle, a site specific IR containment and cleanup plan should be required to prevent damage to these resources (Note that this wetland is not noted in Section 7 of the HDD Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan, addressing Bog Turtles during IR response operations). Conditions appropriate to assure protection to these resources should be included in any approval of the proposed HDD plan.
- The Best Management Practices included in the Conclusion of the report are generic. Project specific practices should be noted and employed - including specifying that monitoring reports including drilling pressures and return amounts be kept and filed with the Department; signing and sealing reports by qualified professionals; noting the frequency of reporting; specifying the pilot

tool and drilling pipeline diameters; specifying the exact methods of monitoring for inadvertent returns and loss of fluid, and qualifying the specific Loss Control Materials that can be used.

- Where IRs are most likely, including entry and exit points and along known faults/traces, adjacent property owner right of entry should be obtained in advance of construction to facilitate efficient containment and cleanup of IR fluids.
- The report states that eight wells have been sampled prior to construction and commits to sampling again following construction. Timeframes for post construction sampling should be required - and additional sampling may be appropriate, since subsurface flow of drilling materials may take extended time.
- With the large number of drinking wells in the vicinity of the proposed HDD, and acknowledged problematic geology, further restriction of additives should be considered by DEP. The HDD Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan requires PADEP approval of drilling fluid additives prior to use, but does not stipulate prior to each use. While an additive may be approved for use in a location far from drinking wells, it may not be appropriate for use where it could migrate to a water supply." (10-12)

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