

April 24, 2018

By Email

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Re: Sunoco's April 18, 2018 letter regarding PA-CA-0023.0000-RD

Dear Ms. Drake:

Sunoco's April 18, 2018 letter to the Department makes disturbingly clear that Sunoco does not plan to avoid impacts to drinking water supplies at the William Penn Avenue crossing. In a previous submission to the Department, Sunoco proposed a single mitigation measure: using the additive DrilPlex in the drilling fluid slurry. The Department has deemed that additive inappropriate for this site, but Sunoco has not offered an alternative or modified its plans so impacts can be avoided. Instead of preventing the contamination and disruption of private drinking water supplies, Sunoco intends to hook residents up to public water. There are serious problems with this approach.

First, infiltrating private drinking water supplies with industrial waste and sediments is illegal. This basic point has been raised in previous comments but warrants repeating now as Sunoco merely plans to replace water supplies rather than preventing impacts. The Department must not authorize this destruction of private property and threat to public health.

Second, even if it were appropriate for the Department to authorize this destruction of private water supplies and contamination of groundwater, Sunoco's determinations regarding which water supplies might be damaged by HDD operations and thus eligible for public water hookup remains arbitrary. Sunoco never provided the hydrogeological analysis requested by the Department to justify its initial assertion that only wells within 150 feet of the alignment were at risk. It simply walked back its claim instead of providing data or analysis. Without hydrogeological analysis, the potential impact radius of the HDD operations at this site remains unknown. Based on previous spills and water contamination events across the state associated with Sunoco's HDD operations, there is a very real possibility that radius extends beyond 450 feet. The fact that Sunoco's plan for managing water contamination is simply to provide alternative water and not prevent the impacts to water supplies makes it even more critical that Sunoco do the work to figure out which water supplies are at risk. Groundwater and geology will not magically respect a 450-foot radius. Since Sunoco does not have a viable plan for

mitigating water supply impacts and is only offering public water hookup to residents within 450 feet of the alignment, residents with water supplies outside of 450 feet are left completely vulnerable. Accordingly, the Department must not approve Sunoco's plans for this site.

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

Sincerely,

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