

April 18, 2018

Dana Drake, P.E.
Environmental Program Manager
Waterway and Wetlands Program
Pennsylvania Department of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Re: Supplemental Information

Goldfinch Lane Crossing (S2-0069)

**Permit No. E11-352** 

Jackson Township, Cambria County

Dear Ms. Drake:

In a letter of response to the Department dated March 30, 2018, Sunoco Pipeline, L.P. (SPLP) proposed the use of DrilPlex<sup>TM</sup>, a horizontal directional drilling (HDD) additive certified for conformance with NSF/ANSI Standard 60, to mitigate the potential for HDD activities to impact private water supplies during the pilot phase of HDD S2-0069 Goldfinch Lane. In subsequent conversations, the Department indicated that it would not approve use of DrilPlex<sup>TM</sup> as an HDD additive. Accordingly, SPLP no longer intends to use DrilPlex<sup>TM</sup> at HDD S1B-0050.

Upon approval to start these HDDs, SPLP will continue to utilize HDD best management practices in accordance with the April 2018 "HDD Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan" to control and minimize the movement of drilling fluids within the geology surrounding the HDD profile.

The best method to prevent impacts to private water supplies continues to be non-use of the water supplies within the 450 foot (ft) buffer surrounding the HDD profile during HDD activities. As shown on the water supply illustration submitted in prior communications, there is one (1) private water source within 450 ft of the HDD profile, and this source is not used for consumption by the landowner. Nevertheless, because public water supply is in the vicinity, and this landowner wishes to be connected to the public water supply, SPLP has directed its agents to contact the local provider and initiate the work required to connect this landowner to the public water source at SPLP's expense.

On April 7, 2018, the Clean Air Council, Mountain Watershed Association, Inc., and the Delaware Riverkeeper Network ("Appellants"), provided a comment to the record for this HDD Reevaluation regarding the PAGWIS well data which indicates the presence of a water well in near vicinity to the HDD profile. The Appellants suggest that SPLP expand the ground review to determine if this well is on an adjacent property. The coordinates provided by the PAGWIS data fall within a 43-acre tract owned by the landowner who will be connected to public water supply

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as stated above. This landowner has consistently denied the presence of an additional water well on the property. Moreover, the adjacent tracts in proximity to the coordinates have public water supply. Accordingly, SPLP asserts that notwithstanding the PAGWIS data referenced by Appellants, all private water sources in near vicinity to the HDD profile for S2-0069 have been identified.

SPLP submits that we are in complete compliance with the agreed terms and requirements of analysis of the Order, as agreed to by the Department, and that no further analysis is required for the Department to consent to the start of these HDDs. SPLP therefore requests that the Department approve the Reevaluation Report for Goldfinch Lane Horizontal Directional Drills (S2-0069) as soon as possible.

Sincerely,

Larry J. Gremminger, CWB Geotechnical Evaluation Leader Mariner II Pipeline Project