



December 20, 2017

Mr. Dominic Rocco, P.E.
Regional Manager; Waterways and Wetlands
Southeast Regional Office
Pennsylvania Department of Environmental Protection;
2 East Main Street
Norristown, Pennsylvania 19401-4915

**Response to Data Request and Comments
Hydrogeological Re-Evaluation Report
North Pottstown Pike, Horizontal Directional Drill (S3-0370): DEP Permit No. E15-862
West Whiteland Township, Chester County, PA**

Dear Mr. Rocco:

On November 8, 2017, Sunoco Pipeline, L.P (SPLP) submitted for public review and comment a Re-Analysis of the proposed Horizontal Directional Drill (HDD) for a segment of the Mariner East II Pipeline Project (Mariner II) known as the North Pottstown Pike HDD, S3-0370 as referenced above. SPLP has received your letter dated December 6, 2017, requesting explanations and additional information relative to our analysis of this HDD. Please accept this letter as a response to your request for further information. Below you will find your specific request in italics, followed by SPLP's response.

1. Explain what alternatives have been considered, aside from the Pipeline Infrastructure Task Force (PITF) recommendation of co-locating the route. Particularly, what alternatives (including alternative routing) have been considered to avoid or minimize impacts to residential, commercial, institutional areas, woodlands, and surface waters such as S-C59, S-C60, and S-C61? Additional stream or wetland impacts will need a separate permit modification request to both DEP and ACOE that specifically meet the regulatory requirements.

As noted in the previously submitted HDD reanalysis, considerable effort was expended in the permitting phase of the Mariner II project to review and account for alternative placement of the new pipelines, and that initial analysis was incorporated into the HDD reanalysis. More specifically, as stated in the Alternative Analysis section of the HDD Reanalysis referenced above, the North Pottstown Pike HDD (S3-0370) was co-located with the existing SPLP pipeline right-of-way (ROW). Rerouting, away from the existing SPLP easement would result in new impacts by creating a new greenfield utility corridor in areas that are not currently encumbered. In addition, given the length and general directions of Streams S-C59, S-C60, and S-C61, the location of additional aquatic resources north of Stream S-C61, no reasonably practicable re-route option lies immediately to the north or south of the proposed route that would not ultimately cross additional water resources regulated by the Department.

Furthermore, rerouting of the project to the southwest of this HDD location would be complicated significantly by the increased density of development as you proceed towards the City of Downingtown. Towards the northeast of this HDD location, a small area of currently vacant lands exists; however, to deviate away from the existing utility corridor to reach this area of unrestricted lands requires passing through significant areas of development. SPLP does not recommend the transfer of a utility encumbrance from a pre-existing location, where the presence of pipeline utilities is well known to past and current landowners, to a new set of previously unencumbered lands and landowners.



The requirement for a modification of the existing authorization, after a determination of abandonment of the HDD as authorized, is understood by SPLP, and this request has already been submitted to the Department, as is documented by the HDD reanalysis.

2. Provide additional information on studies conducted and/or measures taken to specifically address concerns with potential impacts to public and private water supplies, including well production zones, from conventional boring and open trenching, including an explanation of how the implementation of such measures will avoid private and public water supply impacts.

Additional information concerning potential impacts to public and private water supplies, and well production zones from conventional construction methodologies has been provided separately to the Department as part of the Major Modification Permit request submitted by SPLP to the Department on October 17, 2017.

3. Provide additional information on what measures will be undertaken to avoid adverse impacts to water resources, including streams and wetlands, from conventional boring, open trenching, and associated activities.

Additional information concerning impacts to water resources, including streams and wetlands from conventional construction methodologies and associated activities has been provided separately to the Department as part of the Major Modification Permit request submitted by SPLP to the Department on October 17, 2017.

4. Provide additional information on how open trenching and conventional boring can be undertaken without causing or exacerbating sinkholes and associated impacts in Karst topography.

Additional information concerning conventional construction methodologies, such as open trench and conventional bore methods, and the potential for sinkholes and associated impacts in Karst topography, has been provided separately to the Department as part of the Major Modification Permit request submitted by SPLP to the Department on October 17, 2017.

5. Explain why the Report relies on previously gathered geotechnical information that led to the original conclusion that HDD could be undertaken in this area without incident, without gathering new geotechnical information, and why the Report reaches a different conclusion, based on this same information, that now proposes that open trenching and conventional bore are preferable methods for pipeline installation.

The HDD reanalysis does not rely on previously gathered geotechnical information. Rather, it relies on new, post permit, geotechnical and hydrogeologic data obtained after issuance of the construction permit.

The original HDD design had no available information at the time about the high yield Aqua PA municipal wells and their proximity to and hydrogeologic connection with the geology of the HDD profile. It was only after this new comprehensive hydrogeologic testing and data review was complete, as explained in the Major Modification Permit request submitted by SPLP, that SPLP was able to confirm that risks of potential impacts to public water supplies from HDD construction were elevated, and that no redesign of the HDD profile could mitigate the increased probability of effects to these water supply wells.



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SPLP appreciates the effort required to review and respond to the Reanalysis of the North Pottstown Pike HDD, and decision by SPLP to abandon this construction methodology for this segment of Mariner II. Respectfully, we request the Department to conclude any further consideration of an HDD construction method at this location, and to commence review of the Major Modification Permit submittal dated October 17, 2017.

Sincerely,

Matthew Gordon
Project Director