

January 14, 2019

Via Electronic Filing

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: Response to Comments  
HDD S2-0040, E32-508  
Norfolk Southern Railroad Crossing  
Burrell Township, Indiana County**

Dear Ms. Drake:

In compliance with the Corrected Stipulated Order dated August 10, 2017 a Reevaluation Report on the above-referenced horizontal directional drill (“HDD”) was submitted to the Department on December 12, 2018. In a letter dated December 27, 2018, comments were provided by the Clean Air Council, Delaware Riverkeeper Network and Mountain Watershed Association (Commentors). Sunoco Pipeline, LP (SPLP) provides this supplemental letter in response to these comments. These comments are bolded below followed by a response.

- 1. 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.**

The 450 ft radius applied to the redesigned HDD profile and alignment extends to the same land parcels as the original HDD alignment. SPLP sent the following communications to the sole

landowner on the following dates: the Alternative Water Supply letter was sent on February 26, 2018; the Offer for Well Testing was sent on February 28, 2018; and the Notice of Reevaluation Report submittal and a courtesy copy of the report was sent December 13, 2018. Copies of these communications are provided in Attachment 1.

**2. 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.**

As noted in the Reevaluation Report, in conjunction with HDD S2-0040, SPLP has collected and analyzed samples from well WL-03202017-520-01, despite the fact that it is located 679 ft east of the HDD profile and therefore outside the 450-foot radius. To date, SPLP has performed two sampling events at WL-03202017-520-01: one prior to the construction of the 20-inch line on March 20, 2017 and a second on the day the pipe was pulled for the 20-inch line on June 7, 2017. Bacteriological analyses for total coliform, fecal coliform and e.coli were subsequently added to the water quality sampling program in August of 2017. As such, these parameters were not analyzed for in either of the two sampling events that have been performed to date. SPLP has maintained communications with the landowner, and SPLP will perform additional sampling of well WL-03202017-520-01, prior to the start of drilling for HDD S2-0040-16. At least two additional sampling events will be performed: one at the beginning of active drilling, and a second after the installation of the 16-inch pipe. These pending sampling events will include the current list of program analytes, including bacteriological analyses for total coliform, fecal coliform and e.coli.

SPLP submits that we have been, and 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 this HDD. SPLP therefore requests that the Department approve the Reevaluation Report for Norfolk Southern Railroad Horizontal Directional Drill (S2-0040) as soon as possible.

Sincerely,



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

Attachment:  
1-Landowner Communications

**ATTACHMENT 1**  
**LANDOWNER COMMUNICATIONS**



**SUNOCO PIPELINE**  
An ENERGY TRANSFER Partnership

P. O. Box 2218  
Altoona, PA 16602

February 26, 2018

**BY CERTIFIED AND FIRST CLASS MAIL**

Re: Mariner East 2 – Pennsylvania Pipeline Project  
Horizontal Directional Drilling Construction Notification  
and Offer of Alternative Temporary Water Supply

Dear [REDACTED]

Previously, Sunoco Pipeline L.P. (“SPLP”) wrote to inform you that certain construction activity known as Horizontal Directional Drilling (“HDD”) for Mariner East 2, also known as the Pennsylvania Pipeline Project, is located within 450 feet of your property boundary. In that letter, SPLP offered private water supply/well testing at SPLP’s expense if you have a private water supply/well located within 450 feet of the HDD alignments. If you have not yet requested testing of your qualifying private water supply/well, but now would like SPLP to have your private water supply/well tested, please contact the Sunoco representative for your area by calling Amy Abramowich at (814) 204-0450.

In addition, as part of this construction activity, SPLP is offering landowners with a private water supply/well located within 450 feet of the HDD alignments to be connected to an alternative temporary water supply, such as a water buffalo, that will be installed and maintained at SPLP’s expense for the entire period of HDD operations.

If you would like to be connected to an alternative temporary water supply, please contact the Sunoco representative for your area by calling Amy Abramowich at (814) 204-0450.

Thank you for your cooperation.

Mark McConnell  
Land Project Manager  
Representing Sunoco Pipeline L.P.  
Office: (814) 204-0450



Percheron Field Services  
 Representing Sunoco Logistics  
 P.O. Box 2218  
 Altoona PA 16602

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PS Form 3800 6/02

**\$3.920**  
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**OUTBOUND TRACKING NUMBER**  
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Postage per piece	\$0.470
Certified Fee	\$3.450
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**SUNOCO PIPELINE**  
An ENERGY TRANSFER Partnership

P.O. Box 2218  
Altoona, PA 16602

February 28, 2018

**BY CERTIFIED AND FIRST CLASS MAIL**

[REDACTED]

Re: Mariner East 2 – Pennsylvania Pipeline Project  
Horizontal Directional Drilling Construction Notification  
and Private Water Supply/Well Sampling Offer

Dear [REDACTED]

Sunoco Pipeline L.P. (“SPLP”) is writing to inform you that a certain construction activity known as Horizontal Directional Drilling (“HDD”) for Mariner East 2, also known as the Pennsylvania Pipeline Project, is located within 450 feet of your property boundary. This HDD will begin as soon as ten (10) days of the date of this letter.

As part of this construction activity, SPLP is offering private water supply/well testing at SPLP’s expense if you have a private water supply/well located within 450 feet of the HDD alignment. SPLP will provide you copies of all test results from your private water supply/well. Please note that upon their request, we will provide the test results to the Pennsylvania Department of Environmental Protection as well.

To assist with this process, SPLP is requesting that you contact the Sunoco representative for your area by calling Amy Abramowich at (814) 204-0450, to provide SPLP with the following information:

1. If you have a private water supply/well on your property;
2. The location of your private water supply/well on your property; and,
3. If you would like to have your private water supply/well tested.

**If you would like to have your private water supply/well tested, you must contact the Sunoco Representative for your area within the next ten (10) days by calling Amy Abramowich at (814) 204-0450. Your private water supply/well will be tested at a mutually-convenient time within ten (10) days of SPLP’s receipt of your request for testing. If you do not contact the Sunoco representative, there will be no further contact from us regarding any private water supply/well testing.**

If you have any questions or concerns, please do not hesitate to contact the Sunoco representative for your area by calling Amy Abramowich at (814) 204-0450.

Thank you for your cooperation.

Mark McConnell  
Land Project Manager -Representing Sunoco Pipeline L.P.  
Office: (814) 204-0450



Percheron Field Services  
 Representing Sunoco Logistics  
 P.O. Box 2218  
 Altoona PA 16603

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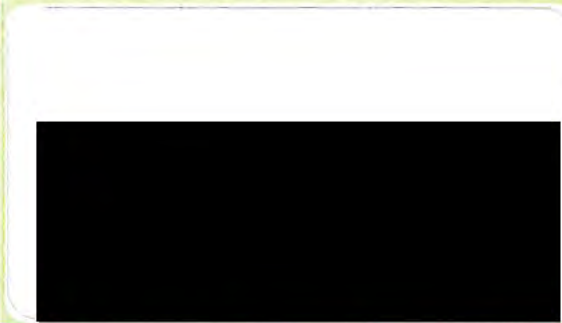
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Certified Fee	\$3.450
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**SUNOCO PIPELINE**  
An ENERGY TRANSFER Partnership

December 13, 2018

**BY CERTIFIED AND FIRST CLASS MAIL**

Re: Mariner East 2 – Pennsylvania Pipeline Project  
Horizontal Directional Drilling – HDD Reevaluation Report for S2-0040 Kendall Rd/Norfolk RR

Dear [REDACTED],

Sunoco Pipeline L.P. (“SPLP”) is writing to inform you that certain construction activity known as Horizontal Directional Drilling (“HDD”) for Mariner East 2, also known as the Pennsylvania Pipeline Project, is located within 450 feet of your property boundary. Pursuant to the terms of a Stipulated Order entered by the Pennsylvania Environmental Hearing Board, SPLP has agreed to perform a reevaluation of this HDD location. The Stipulated Order requires SPLP to send a copy of the enclosed HDD Reevaluation Report to all landowners who have a private water supply/well that is located within 450 feet of the HDD.

**If you have a private water supply/well that is located within 450 feet of the S2-0040 Kendall Rd/Norfolk RR, you can submit comments on the enclosed HDD Reevaluation Report to the Pennsylvania Department of Environmental Protection (“PADEP”) within fourteen (14) days of the date of this letter. Comments must be submitted to PADEP at:**

Karyn Yordy  
Executive Assistant, Office of Programs  
Department of Environmental Protection  
Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101  
Email: kyordy@pa.gov  
Phone: (717) 772-5906; Fax: (717) 705-4980

The Stipulated Order and a copy of the enclosed HDD Reevaluation Report are available for review on the Mariner East 2 Project website maintained by PADEP, which can be accessed at:  
<http://www.dep.pa.gov/Business/ProgramIntegration/Pennsylvania-Pipeline-Portal/Pages/Mariner-East-II.aspx>.

Thank you,

Mark McConnell  
Land Project Manager  
Representing Sunoco Pipeline L.P.  
Office: (814) 204-0450



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8,046,823; 8,103,647; 8,193,579; 8,301,572; 8,372,311; 8,498,943 and 8,943,464.



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