

October 10, 2019

By Email
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Re: Comments on Report for HDD PA-CH-0326.0006-RD (HDD# S3-0471)

To whom it may concern:

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 indicated by drawing number PA-CH-0326.0006-RD.

1. The plans should be revised to clearly delineate high risk areas and bedrock.

The results of the geophysical surveys indicate several fractured areas that present a risk of inadvertent returns and LOCs. These results should be juxtaposed with a cross-sectional view of the proposed 20-inch line so the highest risk areas can be readily identified. In order for everyone working the site to make the best use of the information gathered in the geophysical surveys, this information should be incorporated into the technical drawings that will actually be used on site. Sunoco states it will share the results of the fracture trace analysis with the crew, but the geophysical survey data is more robust and accurate. Especially for locations where Sunoco plans to pass through fractured rock at a shallow depth, such as between stations 15378+00 and 15379+00, Sunoco should make specific response plan now instead of waiting for IRs to unfold. In addition, the cross-sectional view of the planned 20-inch profile should include the approximate bedrock depth. The Plans and Profiles in Attachment A to the HDD Hydrogeologic Report only show the approximate bedrock at one location along the entire profile.

2. Sunoco has not accounted for steering challenges associated with local geology.

The proposed profile will pass through Baltimore Gneiss, a formation known for heterogeneous rock that can lead to difficulties in drilling and steering. Sunoco plans to install the 20-inch line using an intercept drill, which will further increase steering difficulty regardless of the geology that is being drilled through. And yet, the Report does not propose a course of action to address the steering problems that could arise. At other HDD sites where Baltimore Gneiss was encountered, Sunoco’s geologists made specific recommendations for how best to

proceed, including recommendations regarding drilling rate and pressure, and to use a diamond bit. The Department should ensure that an appropriate plan is in place to avoid and mitigate steering difficulties here.

3. Sunoco has failed to present a plan to manage groundwater discharge.

The Report explains there is a risk of groundwater discharge due to differences in elevation along the profile. It is crucial Sunoco have an appropriate, site-specific plan for preventing and managing its disruption of groundwater. Currently, the Report includes no such plan. Groundwater discharge has been a problem many times throughout Mariner East construction. Residents have reported numerous truckloads of water being removed at some sites and concerns that the excessive water loss has altered water tables and drained aquifers, leading to bacterial contamination of water well. It is unclear if Sunoco returns water it extracts to the appropriate location. It should commit to doing so here as part of a comprehensive plan to avoid impacting groundwater. Drinking water supplies will not be safe unless groundwater protection is taken seriously.

4. Sunoco had not provided sufficient evidence that it will test and protect water supplies.

- Unclear what is meant by “continue to included in groundwater monitoring program”

Sunoco identified 120 parcels within 450 feet of the HDD alignment at this site, 16 of which rely on private drinking water wells. The Report does not provide a plan for protecting these wells, or even acknowledge that they are at risk. However, the geological data in the Report suggests these wells are at risk of contamination or other interference. The highly fractured nature of the rock and the risks to groundwater associated change in elevation between entry and exit pits both pose threats to drinking water supplies. The Report will not be complete until those risks are fully addressed and a plan to protect the wells is in place.

A first step in protecting the waters supplies is providing water supply testing and accurately assessing the results of the tests and past complaints. For one well owner, Sunoco has not yet conducted testing and intends to do so at an unspecified future date. The Department should ensure that Sunoco does not begin drilling until that testing is complete. The Department should also ensure water testing results are included in the Report. At this point, no well testing data for any of the wells has been disclosed in the reevaluation process. In previous Reports, when pushed by the Department, Sunoco has provided summary test result tables, but has also included inaccurate generalizations about readings for relevant test parameters. For accountability, the results themselves, or summary tables, should be incorporated here.

Sunoco admits that there was a complaint regarding water supply contamination during the installation of the first pipe. It claims it is not responsible for the contamination incident, but has not provided any corroborating data or analysis. Any geological investigation that was done regarding this well complaint should be incorporated into the Report. In previous instances where Sunoco has denied liability, the investigations it relied on were based on faulty timelines. (See, for example, the reevaluation of the HDD crossing of Woodbine Drive, PA-DA-0063.0000-RD-16). The Department must make sure additional wells are not endangered because Sunoco has provided incomplete or inaccurate information.

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

Sincerely,

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