

March 5, 2019



By Email

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Re: Comments on Report for HDD PA-DA-0056.0000-RD-16 (HDD# S3-0080-16)

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 (“HDD”) indicated by drawing number PA-DA-0056.0000-RD-16 (the “HDD Site”).

1. The Report contains nothing on communications with nearby water supply owners besides doing a survey at an unspecified time.

The Report stated of communications with landowners neighboring the HDD Site:

SPLP performed a preconstruction survey of all landowners within 450 ft and greater from the HDD S3-0080-16 alignment. Through this outreach effort twelve landowners provided their well location and well data if known. As a result, six water wells were identified within the 450-foot buffer of the alignment.

Unlike many other re-evaluation reports, there is no discussion of whether any residents wanted their water tested, whether they wanted replacement water during drilling, whether there had been any water supply complaints during the 20-inch drill, or anything else related to water supplies. Moreover, it is unclear when Sunoco conducted this survey. For all we know, this survey could have been done in 2015 when early work was done on the project and the details and risks were much less known. Furthermore, such an old survey would be out of date.

Section 3.0 of the Hydrogeologic Report suggests that a survey was done in February of 2019. Most likely both reports are discussing the same thing; however, it is not clear.

The Department should require clarity in when and how this survey was done to ensure that Sunoco has complied with the Order and has up-to-date information.

2. The Alternatives Analysis does not consider alternatives to HDD besides open-cut.

Despite including a section titled “Open-cut and Conventional Bore Analysis,” the Report actually contains no analysis of conventional boring or any other alternative to HDD besides open-cut. This is in contrast to virtually every other re-evaluation report submitted before the Report. This is unfortunate. While HDD is very likely the best option for the eastern end of the planned 16-inch drill given the long stretch of forested wetlands and streams there, it is less clear that is the case for the western end of the Site. Sunoco does not do the analysis.

3. The Report appears to not comply with paragraph 5.i of the Order requiring that it “document in detail the information considered for the re-evaluation of the design of the HDD.”

The Report states: “SPLP possesses a complete geologic record of the bore path from drilling the 20-inch profile.” If that is the case, then the Report does not comply with the Order, which specifies at paragraph 5.i that “The Report shall document in detail the information considered for the re-evaluation of the design of the HDD at that site.” This “complete geologic record” is nowhere to be found in the Report. Moreover, it does not appear to have been made available to Sunoco’s hydrogeologists, who do not describe knowing what that “complete geologic record” is.

4. The Report contains additional irregularities.

In addition, the Figure 1 and Figure 2 drawings do not have parallel revision histories. This is also the case with another recent re-evaluation report. Figure 2 matches the revision history of the permitted drill. It is unclear where Figure 1 came from.

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

Sincerely,

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