

February 7, 2019



By Email

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Re: Comments on Report for HDD PA-LE-0001.0000-SR-16 (HDD# S3-0090)

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-LE-0001.0000-SR-16 (the “HDD Site”).

Sunoco’s proposal to align the HDD for the 16-inch with the path and ends of the HDD for the 20-inch as revised in the field is an improvement over the status quo. It remains the case that, as explained in the Hydrogeological Report within the larger Report, the drill is susceptible to inadvertent returns, and should be approached cautiously. Sunoco rightly adds to its list of BMPs enhanced monitoring when drilling through locations of earlier spills. Appellants suggest that the Department request that Sunoco spell out what that enhancement monitoring would be.

Appellants do not have independent knowledge suggesting that geophysical surveying is crucial at the HDD Site. That said, Appellants take issue again with Sunoco’s statement that “At this HDD location the use of geophysics assessments was considered but not conducted because the results from these types of assessments provide limited useable data after 20 to 50 ft below the ground surface (bgs) varying by the nature of the geologic structure.” Contractors in this area have found it useful at greater depths. *See* <https://spectrumgeophysics.com/bedrock.html>. In fact, Sunoco contradicts itself; in an earlier letter to the Department, it wrote, “At the five karst locations, the results of the geophysics provided usable data to a depth of 15 ft to 60 ft bgs.” *See* May 12, 2018 Sunoco letter to DEP, http://files.dep.state.pa.us/ProgramIntegration/PA%20Pipeline%20Portal/MarinerEastII/HDD_Reevaluation_Reports/Sunoco_Response/Sunoco%27s%20Response%20to%20DEP%20-%205-12-18%20-%20Strasburg%20Road-Bow%20Tree%20Drive%20Crossing.pdf, at page 4.

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

Sincerely,

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