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By Email

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Re: Comments on Report for HDD PA-DA-0005.0000-RD-16 (HDD# S3-0011-16)

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-0005.0000-RD-16 (the "HDD Site").

1. The Report contains nothing on communications with nearby water supply owners besides the sending of a letter a year ago.

The HDD Site is in urban Highspire, crossing dense residential development. Dozens of parcels are within 450 feet of the HDD. Some of these homes have wells. The Report stated:

To identify water well locations relative to the revised (extended) 16-inch HDD profile, in February 2018 SPLP sent certified letters to all landowners with properties within 450 ft of the revised HDD alignment. Public Water Suppliers within 0.5 mile were also identified and notified of the project. As a result of these communications, three 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. The Department should require Sunoco to provide this information so the Department and the public can have a complete picture of risks to water supplies and the mitigation actions Sunoco has taken. There is potential for large impacts to drinking water supplies in this densely populated neighborhood where the overburden is loose and there is a history of drilling fluid spills, and complete information is critical.

2. 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 full geologic profile from the drilling of the 20-inch pipeline. No additional information is needed to evaluate the 16-inch HDD.” 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 “full geologic profile” 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 “full geologic profile” is.

3. The Alternatives Analysis does not consider all plausible alternatives and contains contradictory information.

In several recent re-evaluation reports, Sunoco has discussed the possible use of “Direct Pipe” as an installation method. If that is a possibility, it should be discussed in the Alternatives Analysis and compared with the revised HDD option. In its PA-CA-0091.0016-RD-16 HDD re-evaluation report, Sunoco wrote, a “direct pipe installation is also a practical means of pipeline installation that can avoid the occurrence of IRs. However, a direct pipe installation bore installation is limited to 750 ft in extent, and this is well under the total length of regulated and protected resources at this HDD location.” That is not the case here, where a regulated resource only intersects the LOD for a small span of the eastern end of the drill.

Sunoco’s alternatives analysis also suffers from reliance on a statement that contradicts its other statements. The Report says that “[c]onventional auger bore is technically limited to less than 200 linear foot [sic] at a time varying by the underlying substrate.” Sunoco’s Trenchless Construction Feasibility Analysis states at Section 4.1.2, however, that “the current maximum extent for a CAB installation of a 16” or 20” diameter pipeline is approximately 390 feet.” See <http://files.dep.state.pa.us/ProgramIntegration/PA%20Pipeline%20Portal/MarinerEastII/Cambria/11%20-%20EAF/Encl%20E%20-%20Comp%20Env%20Eval/Part%203%20-%20Alternatives%20Analysis/Appendix%20B%20-%20Trenchless%20Feasibility%20Analysis%20%202016-11-29-FINAL.pdf>. And Sunoco has elsewhere in a letter to the Department dated August 24, 2018 stated “conventional auger bore is technically limited to less than 300 linear ft of relatively flat land surface at a single attempt.” Which one is it?

4. It is unclear if or how Sunoco used the geophysical information it gathered.

Sunoco quite properly performed geophysical surveys at the HDD Site, which exhibits a risky combination of high population density and loose overburden / weathered upper bedrock. Section 7.0 of the Hydrogeologic Report presents the summary of the results of those surveys. They appear to have found useful information about the subsurface at the Site. However, the survey results themselves are not presented, the main Report does not discuss the results, and it is nowhere explained if or how the geophysical information was used. Again, the Order specifies that the “Report shall document in detail the information considered for the re-evaluation of the design of the HDD at that site.” Here, it is not clear whether this information was considered,

and only a high-level summary is presented for the public and the Department to consider. The Department should seek additional information on the survey results and if/how Sunoco took them into account.

5. The Report contains additional irregularities.

Three inadvertent returns were described in Section 6.0 of the Hydrogeologic Report, but there are several references to there being two rather than three IRs, and the revised profile view only identifies the locations of two IRs. This should be clarified and made consistent, and the revised profile should identify the locations of all IRs.

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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