

May 29, 2019



By Email

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Re: Sunoco's response to the Department's request for information on PA-DA-0005.0000-RD-16 (HDD# S3-0011-16)

Dear Mr. Williamson,

On March 22, 2019, the Department requested additional information from Sunoco regarding its reevaluation ("Report") of the horizontal directional drilling ("HDD") indicated by drawing number PA-DA-0005.0000-RD-16 (the "HDD Site"). Sunoco responded to the March 22, 2019 letter on May 23, 2019, supplementing the Report. 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 regarding Sunoco's May 23, 2019 supplemental response ("May Response"). The comments are numbered to correspond to the numbering in the Department's March 22, 2019 requests and the May Response.

1. Justification of Drilling Path

The Department made a number of requests related to Sunoco's lack of explanation or justification for the specifications it is proposing for the 16-inch profile. First, the Department pointed out that Sunoco "failed to fully utilize information gathered during the HDD of the 20-inch bore as part of the HDD Re-evaluation for the 16-inch pipeline." The Department requested Sunoco include "geologic and drilling information collected by various site personnel during the drilling of the 20-inch bore that can be used to synthesize a comprehensive history of each or groupings of events." The Department specifically directed Sunoco to "include the full geologic profile from the drilling of the 20-inch HDD." In the Report, Sunoco had claimed that it possessed a complete geologic profile from the drilling of the 20-inch HDD and thus did not need any additional information. This makes it especially important that Sunoco provide the full geological profile from the 20-inch HDD and discuss how that data informed its plans for the 16-inch line. Not only does the May Response not include this information or analysis, it casts doubt on its value.

The May Response explains that the 20-inch HDD "was completed prior to the collection of drill cutting samples at 5-foot intervals, but drill cuttings were examined multiple times throughout each day that the 20-inch pilot tool and reamers advanced." This suggests that

Sunoco may not in fact have the full geologic profile it had claimed to have. Because Sunoco has still not shared any such data, the Department and the public have no way of knowing how thorough or useful these unsystematic examinations of drill cuttings were. The May Response does, however, suggest that Sunoco ignored geotechnical data when drilling for the 20-inch line. Sunoco appears to have known from its early geotechnical boring that the shallow depth of the 20-inch profile would be situated in unconsolidated material, which is known to increase the risk of IRs. This demands explanation. If there was something about the geotechnical data that rendered it unreliable, all the more reason additional geotechnical data should be gathered now.

Sunoco also ignores the Department's request to explain why the proposed bore path for the 16-inch line was chosen. A satisfactory response would discuss, with supporting detail, factors such as the integrity of the bedrock at the specific depth that was chosen for the horizontal run as compared to the integrity of the bedrock at other potential depths. No such discussion is provided.

2. Water Supplies

The Department asked Sunoco to evaluate and discuss how the proposal for the 16-inch profile will "minimize the potential for IR's and impacts to water supplies," as well as provide other information. Sunoco provides no such evaluation or discussion of minimization. Instead, it discusses the sampling during and after the construction and a water supply complaint.

How will Sunoco protect these water supplies during drilling of the 16-inch? Per the Order, residents also need to be offered water testing before, during, and after the drilling of 16-inch line. Sunoco should make clear that it intends to follow through on this obligation.

3. Geophysics

In response to the Department's request, Sunoco has now shared the results of the geophysical surveys it had previously failed to disclose. These results reveal a concerning degree of fracturing along the entire length of the proposed 16-inch profile. The fractures/anomalies appear to continue into the zone of competent bedrock where Sunoco intends to drill. In light of this, Sunoco's plans for addressing the risk of IR's associated with these fractures appear inadequate.

In the Report, Sunoco admits that the features revealed in the geophysical surveys, "if fractures, could represent possible pathways for IRs during HDD operations." Sunoco proposes to provide its drillers with information about the location of the fractures, to monitor drilling fluid viscosity, and to use Loss Control Materials and grouting as appropriate. These are all reasonable (albeit boilerplate) precautions, but do not get to the core issue: designing a profile that avoids these fractures or other anomalies that could be indicative of preferential pathways to the fullest extent possible. As the Department requested earlier, Sunoco needs to justify the particular depth it has chosen for the 16-inch profile. Its analysis needs to include a discussion of the extent to which the fractures that were identified in the geophysical surveys are present at the depth it proposes to drill. Sunoco should also explore whether a deeper profile would avoid some of these anomalies. From the little explanation Sunoco has provided regarding the

selection of profile depth, it is clear Sunoco's main focus in the redesign was avoiding in the unconsolidated sediments it has chosen to drill through previously. The design does not appear to account for the depth or extent of fracturing. Additional geotechnical surveying may be needed to complete this analysis.

4. Undisclosed Inadvertent Returns

The Department asked Sunoco to provide clarification regarding whether all four IRs that occurred at the site during the construction of the 20-inch line were considered in the redesign of the 16-inch profile. In short, Sunoco's response is "no." Sunoco first attempts talk its way around what constitutes an IR by referring to multiple incidents that occurred 300 feet from the exit point as "punch out releases." Sunoco then gives a brief play by play of the incidents, but provides no indication that these incidents were considered in the redesign of the 16-inch profile. The Department also explicitly instructed Sunoco to document the locations of these IRs on the profile maps, as it has done for other reevaluations. Sunoco has ignored this simple request. The Department's requests regarding documentation and consideration of IRs were reasonable and the Department should continue to pursue them.

Thank you for considering these comments. Please keep Appellants apprised of any next steps.

Sincerely,

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