



**pennsylvania**

DEPARTMENT OF ENVIRONMENTAL  
PROTECTION

March 22, 2019

Mr. Matthew Gordon  
Sunoco Pipeline, L.P.  
535 Fritztown Road  
Sinking Spring, Pennsylvania 19608

Re: Hydrogeological HDD Re-Evaluation Report  
White House Ln. 16" Horizontal Directional Drill Location (S3-0011-16)  
Permit No. E22-617  
Lower Swatara Township, Dauphin County

Dear Mr. Gordon:

The Pennsylvania Department of Environmental Protection (DEP) is requesting more information from Sunoco Pipeline, L.P. (SPLP) related to the HDD Re-Evaluation for the White House Ln. site, HDD# S3-0011-16 and permitted under Permit E22-617, posted on the DEP Mariner East II pipeline portal webpage on February 19, 2019.

1. As required by Paragraph 4. and 5. of the Environmental Hearing Board's August 10, 2017 Corrected Stipulated Order (Order), SPLP 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. Please gather geologic and drilling information collected by various site personnel during the 20-inch bore that can be used to provide a summary confirmation of the geology at the site. This should include the full geologic profile from the drilling of the 20-inch HDD. Additionally, the location of the loss of 5,000 gallons of drilling fluid was not noted on any figures or in the text. At what point along the drill path was the loss discovered? Geologic drilling log notes should indicate the location of the loss and be provided and incorporated into the re-evaluation. The re-evaluation should also discuss and consider additional precautions, such as casing, that may prevent or further minimize the risks associated with potential inadvertent returns (IRs) on entry and exit activities of the HDD in the overburden.

This information should then be used to further describe why the chosen bore path for the 16-inch pipeline was determined and how such information has been used to minimize the potential for IRs to occur and as part of the discussion of construction alternatives, including why HDD activity is still the preferred and chosen methodology for pipeline construction at this location. Within the construction alternatives analysis, please provide an evaluation and discussion of other trenchless methodologies and why they are not a feasible alternative to HDD.

2. Relating to the Analysis of well production zones and use of information obtained during construction of the 20-inch pipeline;

From the re-evaluation report it is unclear whether additional water supplies within 450 feet of the HDD were investigated or identified prior to construction of the 20-inch pipeline. In accordance with the Order, did SPLP identify the three private water supplies noted in the re-

evaluation prior to October 2017? In addition, the re-evaluation report fails to include evaluation of the information and data collected for the three private water supplies within 450 feet of the HDD.


Any private or public water supply data obtained within 450 feet or otherwise obtained in the vicinity of the 20-inch or proposed 16-inch HDD should be used and discussed as part of this HDD re-evaluation. This data should include but not be limited to any applicable water supply sampling data and any water supply complaints that SPLP may have obtained and received for water supplies within 450 feet of the HDD or within the general vicinity during construction of the 20-inch pipeline. The results of the SPLP's water supply sampling program, investigation, disposition of a complaint, and any correlation or non-correlation to SPLP's construction activities should be evaluated and discussed in the HDD re-evaluation report and used to demonstrate that the proposed 16-inch HDD activity will minimize the potential for IR's and impacts to water supplies. Please revise the re-evaluation report to include this information.

3. Seismic survey and ground penetrating radar surveys were conducted but the data was not provided in the report. DEP requests that you provide the data for both surveys.
4. The HDD Re-evaluation Analysis summary identifies that only two IRs occurred during construction of the 20-inch pipeline. DEP has previous documentation from SPLP and Section 6.0 of the Geological Report acknowledges that four IRs occurred at this HDD site. Please provide clarification about whether all of the reported IRs were considered as part of this re-evaluation. If all of the IRs at this site were not considered, revise the applicable sections of the re-evaluation report accordingly to include the consideration of all of the IRs that occurred at this site. Locations of IRs should be documented on profile maps, as done in other re-evaluation reports.

Upon receipt, DEP will post SPLP's response to this letter on the DEP pipeline portal webpage for public comment. The public will have 5 additional business days from the date of posting on the website to provide DEP any additional comment.

If you have any questions or would like to discuss this letter, please contact me at [scwilliams@pa.gov](mailto:scwilliams@pa.gov) or 717.705.4799.

Sincerely,



Scott R. Williamson  
Program Manager  
Waterways & Wetlands Program

cc: Larry Gremminger, Energy Transfer Partners/Sunoco Pipeline, L.P. (pdf copy)  
Monica Styles, Sunoco Pipeline, L.P. (pdf copy)  
Doug Hess, P.G., Skelly and Loy  
Rich Snyder, Dauphin County Conservation District (pdf copy)