



535 Fritztown Road
Sinking Spring, PA 19608

January 12, 2018

Via Electronic Mail – aneatkinso@pa.gov

Ms. Aneca Y. Atkinson
Director, Program Integration
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Re: Initial Response to January 3, 2018 Administrative Order

Dear Ms. Atkinson:

Sunoco Pipeline, L.P. (“SPLP”) provides the following response to the Administrative Order the (“Order”) issued by the Pennsylvania Department of Environmental Protection (the “Department”) on January 3, 2018.

As discussed at the meeting with representatives of the Department on January 4, and in compliance with Paragraph 1 of the Order, SPLP has, under separate cover, requested the Department’s approval to conduct limited work to assure the safe shutdown of all work permitted in the permits referenced in the Order. SPLP affirms that in accordance with paragraph 1 of the Order, all work set forth in the permits referenced in the Order have been suspended. Under separate cover, and also attached in response to paragraph 10 below, SPLP has notified the Department of areas where the winter weather combined with difficult topography has prohibited the backfilling and/or temporary stabilization of earth disturbances, which will be performed when weather conditions permit. Other than these areas, and in accordance with paragraph 19 of the Order, SPLP has temporarily stabilized all disturbed areas in accordance with the E&S Plans and will continue to maintain temporary stabilization of such areas as necessary.

In accordance with paragraph 18 of the Order, SPLP submits the following for the Department’s review and approval:

- **Paragraph 2** – *Within 30 days of the effective date of this Order, Sunoco shall submit a detailed description of any method of trenchless pipeline construction techniques that have been used or will be proposed for use in the completion of PPP-ME2, other than (dry) conventional auger bore and HDD, as those methods are defined in the ‘Trenchless Construction Feasibility Analysis,’ dated December 2016, that was approved as part of the Chapter 105 Permits.*

- A description of all trenchless pipeline construction techniques for the construction of the Mariner East 2 project is attached as **Exhibit "A."** On a going forward basis, SPLP will not use any trenchless methodology other than as currently permitted. If other methods are determined to be technically appropriate and necessary for construction at a particular location, SPLP will request an appropriate permit modification from the Department.
- **Paragraph 3** – *Within 30 days of the effective date of this Order, Sunoco shall submit to the Department full documentation of each crossing of a wild trout stream, stocked and wild trout fishery, stocked trout fishery and Class A trout fishery. The documentation shall include the date(s) of the installation of the pipeline, which pipeline was installed (20 inch, 16 inch, or both), the municipality and county, the stream number, latitude and longitude, and photographic documentation of the crossing including all before, during and after photographs of the installation. Sunoco shall submit this documentation to the Department on the forms attached hereto as Exhibit 1.*
 - In compliance with the Order, SPLP is in the process of responding to this paragraph and anticipates that it will transmit the requested information to the Department during the week of January 15, 2017.
- **Paragraph 4** – *Within 30 days of the effective date of this Order, Sunoco shall submit a report to the Department documenting any other unpermitted changes made to the method for installation of the pipeline. Permitted methods of pipeline construction are limited to open trench/open cut, and two trenchless installation methods, (dry) conventional auger bore and HDD, as those methods are defined in the 'Trenchless Construction Feasibility Analysis' dated December 2016 and approved as part of the Chapter 105 Permits. Such changes include, but are not limited to, a change from conventional auger bore to HDD (including, but not limited to, "flex bore"), a change from open cut to conventional auger bore or HDD (including, but not limited to, "flex bore"), and a change from HDD (including, but not limited to, "flex bore") or conventional auger bore to an open cut. The report shall document all steps taken by Sunoco to determine if unpermitted changes have occurred. The information regarding the altered crossing methodology shall be provided on the folios attached hereto as Exhibit 2.*
 - In compliance with the Order, SPLP is in the process of responding to this paragraph and anticipates that it will transmit the requested information to the Department during the week of January 15, 2017.
- **Paragraph 5** – *Within 30 days of the effective date of this Order, Sunoco shall submit a list to the Department that documents the legal name of all drilling contractors and subcontractors who have worked, or will be working, on the PPP-ME2. The list shall include the contact information for each contractor and subcontractor including the*

name of the business contact person, contact telephone numbers and email addresses, the HDD number for each HDD that the contractor or subcontractor has worked on, or will be working on, the municipality and county for each HDD, and the latitudes and longitudes for each location.

- A spreadsheet containing the information requested in paragraph 5 of the Order is attached as **Exhibit “B,”** which has been verified by the HDD contractors. As the Department is aware, the Mariner East 2 project is divided into six construction spreads. Each construction spread has a prime contractor that hires various subcontractors, including HDD contractors and HDD subcontractors. The prime contractor for each construction spread is as follows:
 - Spread 1 – Welded Construction, L.P.
 - Spread 2 – US Trinity Energy Services, LLC
 - Spread 3 – Union Pipeline, Inc., from March 24, 2017 through October 19, 2017; Michels Corporation, from July 26, 2017 through current.
 - Spread 4 – Precision Pipeline, LLC
 - Spread 5 – Welded Construction, L.P.
 - Spread 6 – Otis Eastern Service, LLC

- **Paragraph 6** – *Within 30 days of the effective date of this Order, Sunoco shall submit a report to the Department that fully explains the failures that led to the violations described in this Order and the steps Sunoco proposes to implement to ensure that those violations will not re-occur.*
 - A report providing the information requested in paragraph 6 of the Order is attached as **Exhibit “C.”**

- **Paragraph 7** – *The permittee shall address all alleged impacts to private water wells in Silver Spring Township, Cumberland County, as described in Paragraph XX to the satisfaction of the private well owners, to include replacement or restoration of the water supply and reimbursement of any costs of displacement during the period when the water supply is adversely impacted.*
 - Both landowners who registered the complaints described in Paragraph XX of the Order were provided bottled water on December 18, 2017. Between December 19, 2017, and December 21, 2017, SPLP arranged for the installation of water buffaloes and improvements to the landowners’ hot water heater and water conditioning systems. All costs to provide each landowner with temporary water supply were borne by SPLP, including provision of water buffaloes and replacing a hot water heater, and replacement of a water conditioning system. SPLP’s land agent also offered to reimburse both affected landowners for any necessary hotel/meal out-of-pocket costs due to the impacted water. Both landowners have confirmed that they are satisfied with SPLP’s expeditious reaction-time and quality of service.

Rather than wait for confirmation that construction activities at this location were in fact the cause of the observed impacts at the wells, SPLP decided to redevelop the wells at these two locations. A proposed work scope for the well redevelopment is outlined below.

The scope of work for well redevelopment will include the following steps:

1. Collection of a pre-redevelopment water quality sample for laboratory analysis. This was completed December 19, 2017, and results were previously provided to the Department on January 5, 2018 in response to Ron Eberts' January 13, 2018 email request.
2. Removal and inspection of the pumping equipment and any associated treatment systems. Make any needed repair or replacement of the pumping equipment.
3. Measurement of water level and total well depth.
4. Airlift surge development and/or pumping to disposal (i.e. discharged water will be pumped out by a vacuum truck for proper disposal off site) until water clears. This is expected to take at least 4 hours but could take longer.
5. Disinfection of the well and pumping to disposal.
6. Reinstallation of the pumping equipment.
7. Collection of a post-redevelopment water-quality sample following reinstallation of the pumping equipment.

Redevelopment of both wells began on Tuesday, January 9, 2018, and is expected to be completed by the end of the week. Both wells are anticipated to be back in service within two to three weeks, after sampling is completed. Negley's Well Drilling will be utilized to complete this work, and a Pennsylvania licensed professional geologist will be on site to supervise the redevelopment work.

- **Paragraph 8** – *In order to demonstrate the ability and intention to comply with the Chapter 102 Permits and Chapter 105 Permits, within 30 days of the date of this Order, the permittee shall submit a comprehensive list of all pending earth disturbance and water obstruction and encroachment related activities currently authorized by the Chapter 102 Permits and Chapter 105 Permits that have yet to be completed or commenced. This list shall include for each project activity identified:*
 - a. *the specific Chapter 105 Permit and/or Chapter 102 Permit under which each of these activities are authorized;*
 - b. *the location (county, municipality, latitude and longitude) where each activity will occur;*

- c. the pipe installation methodology authorized by the Chapter 105 Permit and/or Chapter 102 Permit (i.e., HDD, open cut, conventional auger bore) at each location;*
 - d. if the activity is an HDD, the associated drill identification number;*
 - e. the specific name and contact information for the on-site contractor representative who is responsible for permit and regulatory compliance at each location;*
 - f. the specific name and contact information for the corporate representative from Sunoco who is responsible for permit and regulatory compliance at each location;*
 - g. The specific name and contact information for the corporate representative from Sunoco who is responsible for supervision and direction of contractors at each location;*
 - SPLP has prepared a spreadsheet provided as **Exhibit “D”** that lists all pending earth disturbance and water obstruction/encroachment related activities that are authorized by the Chapter 102 and Chapter 105 permits but that are not yet completed or commenced, which includes the items identified in paragraphs 8a-8g above. Contact information for the individuals identified in items 8e, 8f, and 8g have been separately provided to the Department. This list does not include general activities associated with the construction of the Mariner East 2 pipeline that may cause de minimis earth disturbance, such as restoration, traversing the right-of-way, and any other minor disturbances required to support construction.
 - h. The specific name and contact information for the corporate Executive Officer from Sunoco who is responsible for environmental compliance in the Commonwealth of Pennsylvania and for the installation of the Mariner II project, if such Executive Officers are different.*
 - The SPLP corporate executive officers responsible for environmental compliance in the Commonwealth of Pennsylvania and for the installation of the Mariner East 2 project are listed in the Operations Plan (Section 2.0), which is described in response to Paragraph 9 below, and is attached as **Exhibit “E.”** Contact information for the key individuals that comprise the environmental construction compliance team for the Mariner East 2 project has been separately provided to the Department.
- **Paragraph 9** – *Within 30 days of the date of this Order, the permittee shall submit a detailed Operations Plan setting forth the additional measures and controls which the permittee and its contractors shall implement to ensure that all permit conditions will be*

followed at all times. The Department shall review the Operations Plan and will approve it only when it deems it to be sufficient and satisfactory. The Operations Plan shall also include the additional measures and controls which the permittee and its contractors shall implement to minimize inadvertent return incidents and water supply impacts to the maximum extent possible.

- An Operations Plan is provided as **Exhibit “E.”**
- **Paragraph 10** – *Within 10 days of the effective date of this Order, Sunoco shall backfill all areas of trench excavation, unless sufficient justification for an extension of time is provided to and approved by the Department in writing.*
 - As of the date of this letter, all areas of trench excavation have been backfilled and temporarily stabilized, with the exception of the locations that SPLP identified in spreadsheets provided to the Department under separate cover that requested the Department allow SPLP additional time to complete backfilling and temporary stabilization due to safety and/or winter weather conditions. For ease of reference, copies of these spreadsheets are also attached here as **Exhibits “F”** and **“G.”**
- **Paragraph 11** – *Within 10 days of the effective date of this Order, Sunoco shall remove the drill bits, reamers, and/or strings for any unpermitted HDD activities, unless Sunoco provides the Department with justification and receives Department approval in writing to leave the bit, reamer, and/or string in place for a specific PPP-ME2 HDD site.*
 - As of the date of this letter, all drill bits, reamers, and/or strings for any unpermitted trenchless construction have been removed, with the exception of the extension of the Susquehanna River HDD ream that was previously submitted to the Department with SPLP’s request to restart operations at this HDD location. The extension of the Susquehanna River HDD ream will be included in SPLP’s forthcoming response to paragraph 4.
- **Paragraph 12** – *Within 10 days of the effective date of this Order, Sunoco shall properly abandon all pilot holes created by the activities in Paragraph 11, unless Sunoco provides the Department with justification and receives Department approval in writing to leave a pilot hole open.*
 - As of the date of this letter, with the exception of the extension of the Susquehanna River HDD, all pilot holes for the locations described in paragraph 11 have been properly abandoned.

- **Paragraph 13** – *Within 10 days of the effective date of the Order, Sunoco shall pull the drill bit and string from the 16-inch line at the Huntingdon HDD Site and properly abandon the pilot hole.*
 - SPLP confirms that the drill bit and string from the 16-inch line at the Huntingdon HDD Site has been removed and that the pilot hole has been properly abandoned.

- **Paragraph 14** – *Prior to conducting any further HDD activity at the Huntingdon HDD Site, Sunoco shall submit a reevaluation of the 16-inch line as required by Paragraph 3 Stipulated Order and receive Department approval of that reevaluation.*
 - SPLP will prepare and submit a reevaluation report for the 16-inch line for the Huntingdon HDD Site.

- **Paragraph 15** – *Within 30 days of the effective date of this Order, Sunoco shall submit as-built drawings, sealed by a Professional Engineer, and a Hydrologic and Hydraulic (“H&H”) analysis using the Hydrologic Engineering Center’s River Analysis System (“HEC-RAS”), sealed by the licensed Professional Engineer who prepared the analysis, for the air bridge at the Perry Bridge Site. The H&H analysis shall show the calculations performed to determine the design and 100-year frequency flood discharges at the Perry Bridge Site. The H&H analysis must clearly demonstrate the difference in hydraulic capacity, stability and flood water surface elevations prior to the placement of the air bridge and with the air bridge in place and include a backwater analysis of both conditions.*
 - a. *If the H&H analysis demonstrates that the air bridge fails to adequately protect the health, safety, welfare and property of the people, natural resources and the environment, then within ten (10) days of receipt of such a determination by the Department in writing, Sunoco shall either remove the air bridge, or submit an application to the Department for issuance of an Emergency Permit for modification of the obstruction/air bridge to immediately address the inadequacies determined through the Department’s review of the H&H analysis.*
 - b. *If Sunoco elects to submit an application for issuance of an Emergency Permit, within 15 days of the Department’s issuance of the Emergency Permit, Sunoco shall complete all modifications to the air bridge in a manner consistent with the proposal contained in its application for the Emergency Permit.*
 - A Report of Findings (As-built Information) is provided herewith as **Exhibit “H”** and the H&H analysis is provided as **Exhibit “I.”** As reflected in response to paragraph 16 below, on behalf of Toboyne Township, SPLP is submitting a Chapter 105 permit application for the Perry Bridge Site; a copy of the permit application, which is being separately filed with the Southcentral regional office, is attached as **Exhibit “J.”** Please note that in accordance with the January 4, 2018 meeting, the Department allowed SPLP and the public to continue to utilize

the air bridge while the H&H analysis and permit applications were in the process of being prepared and reviewed.

- **Paragraph 16** – *Within 60 days of the effective date of this Order, Sunoco shall submit a complete Water Obstruction and Encroachment Permit application that complies with the requirements of the Dam Safety and Encroachment Act, the Clean Streams Law, 25 Pa. Code, Chapter 105 and all other applicable statutory and regulatory requirements for the air bridge at the Perry Bridge Site.*
 - a. *Sunoco shall submit the complete Water Obstruction and Encroachment Permit application in the name of and on behalf of Toboyne Township, Perry County, who is the owner of the bridge*
 - b. *Sunoco shall provide the necessary information, including any bridge design changes determined to be necessary by the Department to meet the applicable requirements, on behalf of Toboyne Township.*
 - c. *If any design changes to the air bridge occur during the permitting process that result in required field work or other modifications including but not limited to the air bridge, approaches, or scour protection, Sunoco shall implement any work or other modifications required by the Water Obstruction and Encroachment Permit within thirty (30) days of the Department approving or acknowledging the use of a Water Obstruction and Encroachment permit for the air bridge at Perry Bridge Site.*
- On behalf of Toboyne Township, SPLP is submitting a Chapter 105 permit application for the Perry Bridge Site. A copy of the permit application for the Department’s review is provided herewith as **Exhibit “J,”** and will be separately filed with the Southcentral regional office.
- **Paragraph 19** – *Effective immediately, Sunoco shall temporarily stabilize all disturbed areas in accordance with the approved E&S Plans and in compliance with 25 Pa. Code § 102.22(b). During the period of the permit suspension, Sunoco shall continue to complete installation of permitted best management practices (BMPs) for PPP-ME2, including perimeter BMPs, in accordance with approved plans and the permit in areas where Sunoco or its contractors have commenced earth disturbance activities. Sunoco shall continue routine monitoring of the installed BMPs and shall perform all necessary ongoing operation and maintenance activities to ensure the BMPs continue to perform as designed, in accordance with the approved E&S Plans and permits.*
 - As noted above, with the exception of locations that SPLP identified under separate cover and requested the Department to allow SPLP additional time to complete backfilling and temporary stabilization due to safety and/or winter weather conditions (*see Exhibits F and G*), SPLP has temporarily stabilized all

disturbed areas in accordance with the E&S Plans and will continue to maintain temporary stabilization of these areas as necessary.

- **Paragraph 20** – *With regard to any in-process and permitted HDD operation (as the HDD installation method is defined in the 'Trenchless Construction Feasibility Analysis' dated December 2016 and approved as part of the Chapter 105 Permits), the permittee shall be permitted to periodically rotate the downhole drill bits or reamers and move them back and forth within the drill holes without advancing the drill hole or conducting additional drilling, to safeguard the integrity of the downhole equipment.*
 - SPLP acknowledges that in accordance with paragraph 20 of the Administrative Order, it is permitted to periodically rotate the downhole drill bits or reamers and move them back and forth within the drill holes without advancing the drill hole or conducting additional drilling, to safeguard the integrity of the downhole equipment. SPLP is in the process of determining whether it is necessary to do so at each permitted HDD location. To ensure that the Department is aware of each of these locations, SPLP is in the process of preparing a list that identifies each location, which will be provided to the Department under separate cover.

- **Paragraph 21** – *Sunoco shall immediately begin implementing the December 15, 2017 revisions to the 'HDD Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan,' attached to this Order as Exhibit 3.*
 - SPLP will be providing proposed revisions to the revised HDD Inadvertent Return Assessment, Preparedness, Prevention and Contingency Plan, and discussing such revisions with the Department.

Sincerely,



Matthew Gordon
Project Manager
Energy Transfer

Enclosure

cc: Ramez Ziadeh, P.E. – rziadeh@pa.gov

List of Referenced Exhibits

- **Exhibit A** – Paragraph 2: Trenchless Construction Methodologies
- **Exhibit B** – Paragraph 5: List of HDD Contractors and Subcontractors, 20” and 16” HDDs
- **Exhibit C** – Paragraph 6: Report in Response to Paragraph 6 of Administrative Order
- **Exhibit D** – Paragraph 8a-8g: List of Remaining Work Pending Earth Disturbance and Water Obstruction/Encroachment Activities
- **Exhibit E** – Paragraph 9: Operations Plan
- **Exhibit F** – Paragraph 10: List of Areas to Complete Trench Backfilling Due to Winter Weather Conditions
- **Exhibit G** – Paragraphs 10 & 19: List of Areas of Ongoing Temporary Stabilization
- **Exhibit H** – Paragraph 15: Perry Bridge Site (Toboyne Township, Perry County), Report of Findings (As-built Information)
- **Exhibit I** – Paragraph 16: Perry Bridge Site (Toboyne Township, Perry County), H&H Analysis
- **Exhibit J** – Paragraph 16: Perry Bridge Site (Toboyne Township, Perry County), Chapter 105 Permit Application



535 Fritztown Road
Sinking Spring, PA 19608

January 22, 2018

Via Electronic Mail – aneatkinso@pa.gov
Aneca Atkinson
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Re: Supplemental Response to January 3, 2018 Administrative Order

Dear Ms. Atkinson:

Sunoco Pipeline L.P. (“SPLP”) provides the following supplemental response to the Administrative Order the (“Order”) issued by the Pennsylvania Department of Environmental Protection (the “Department”) on January 3, 2018. This submission supplements the response provided to the Department on January 12, 2018. With the submission of this response, SPLP has provided responses to all of the requests set forth in the Order.

In accordance with paragraph 18 of the Order, SPLP submits the following for the Department’s review and approval:

- **Paragraph 3** – *Within 30 days of the effective date of this Order, Sunoco shall submit to the Department full documentation of each crossing of a wild trout stream, stocked and wild trout fishery, stocked trout fishery and Class A trout fishery. The documentation shall include the date(s) of the installation of the pipeline, which pipeline was installed (20 inch, 16 inch, or both), the municipality and county, the stream number, latitude and longitude, and photographic documentation of the crossing including all before, during and after photographs of the installation. Sunoco shall submit this documentation to the Department on the forms attached hereto as Exhibit 1.*
 - A completed copy of **Exhibit “1”** to the Order together with a summary explanation of the data provided is attached, which lists all trout streams that have been crossed or that are planned to be crossed by the Mariner East 2 project. Due to the volume of photographs for each stream crossing, SPLP has uploaded the photographs to the Department’s FTP site, as requested, which are organized by stream identification number.

- **Paragraph 4** – *Within 30 days of the effective date of this Order, Sunoco shall submit a report to the Department documenting any other unpermitted changes made to the method for installation of the pipeline. Permitted methods of pipeline construction are limited to open trench/open cut, and two trenchless installation methods, (dry) conventional auger bore and HDD, as those methods are defined in the 'Trenchless Construction Feasibility Analysis' dated December 2016 and approved as part of the Chapter 105 Permits. Such changes include, but are not limited to, a change from conventional auger bore to HDD (including, but not limited to, "flex bore"), a change from open cut to conventional auger bore or HDD (including, but not limited to, "flex bore"), and a change from HDD (including, but not limited to, "flex bore") or conventional auger bore to an open cut. The report shall document all steps taken by Sunoco to determine if unpermitted changes have occurred. The information regarding the altered crossing methodology shall be provided on the folios attached hereto as Exhibit 2.*
 - A completed copy of **Exhibit "2"** to the Order is attached together with a report that documents the steps that SPLP has taken to respond to paragraph 4.

In addition, during the January 19, 2018 meeting between the Department and SPLP, the Department requested that SPLP provide supplemental information on certain items provided with SPLP's January 12, 2018 response to the Order. SPLP's provides the following response to the Department's request for additional information:

- **Paragraph 2** – The Department requested that SPLP provide a summary chart of the various bore methods described in the summary of trenchless construction methodologies previously provided to the Department with SPLP's January 12, 2018 response to the Order as **Exhibit "A."** The requested summary chart has been incorporated into a revised version of Exhibit A, which is attached.
- **Paragraph 5** – With its January 12, 2018 response to the Order, SPLP submitted a spreadsheet containing the information requested in this paragraph, which requested a list of all HDD contractors and subcontractors who have worked or will be working on the Mariner East 2 project (i.e. **Exhibit "B"**). Certain typographical errors were noted in this document, including latitude and longitude information, and the inadvertent omission of a location in construction spread 5. A revised version of **Exhibit "B"** is attached.

Further, during the January 19, 2017 meeting between SPLP and the Department, the Department also requested SPLP provide contractor and subcontractor information for the bores that were identified in the Order, as well as any other changes in construction methodology that were identified in SPLP's response to paragraph 4 of the Order. A list of contractor and subcontractor for these locations is attached as **Exhibit "3."**

- **Paragraph 8** – The Department noted certain typographical errors in the spreadsheet that SPLP previously provided in response to this paragraph (i.e., **Exhibit “D”**), and noted that the spreadsheet did not contain the associated Chapter 102 and/or 105 permit reference for each location. A revised version of **Exhibit “D”** is attached.
- **Paragraph 9** – The Department requested that SPLP revise the Operations Plan to clarify certain roles and responsibilities. A revised version of the Operations Plan (i.e., **Exhibit “E”**) is attached.
- **Paragraph 10** – The Department requested SPLP to identify whether there were any modifications to erosion and sediment control BMPs that were necessary for the locations that SPLP identified and requested the Department allow SPLP additional time to complete backfilling and temporary stabilization due to safety and/or winter weather conditions (i.e., Exhibits “F” and “G” to the January 12th response). The Department identified an area located in the Tuscarora State Forest where a section of open trench has not yet been backfilled due to winter weather conditions, and requested SPLP to confirm whether the erosion and sediment controls in this area were sufficient during the period of time while construction is suspended. SPLP has reviewed this location and confirmed that the existing erosion and sediment controls are adequate and appropriate for the existing field conditions. SPLP will continue to monitor this location and other areas of open trench locations, and if additional BMPs are required, will implement them following appropriate approval from the Department and/or County Conservation District.

Further, since the January 12th response, additional locations in construction spread 3 have been identified where winter weather conditions have prohibited SPLP from backfilling within 10 days after issuance of the Administrative Order. These additional locations are included in the attached revised version of **Exhibit “F.”**

Sincerely,



Matthew Gordon
Project Manager
Energy Transfer

Enclosure

cc: Ramez Ziadeh, P.E. – rziadeh@pa.gov

List of Referenced Exhibits

- **Exhibit 1** – Paragraph 3: Trout Stream Narrative Summary and Spreadsheet
- **Exhibit 2** – Paragraph 4: Changes in Construction Methodology Report and Spreadsheets
- **Exhibit 3** – List of Contractor and Subcontractors for Bore Locations Identified in Exhibit “2” and Administrative Order
- **Revised Exhibit A** – Paragraph 2: Trenchless Construction Methodologies, with summary chart
- **Revised Exhibit B** – Paragraph 5: List of HDD Contractors and Subcontractors, 20” and 16” HDDs
- **Revised Exhibit D** – Paragraph 8a-8g: List of Remaining Work Pending Earth Disturbance and Water Obstruction/Encroachment Activities
- **Revised Exhibit E** – Paragraph 9: Operations Plan
- **Revised Exhibit F** – Paragraph 10: List of Areas to Complete Trench Backfilling Due to Winter Weather Conditions



535 Fritztown Road
Sinking Spring, PA 19608

January 29, 2018

Via Electronic Mail – aneatkinso@pa.gov
Aneca Atkinson
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Re: Second Supplemental Response to January 3, 2018 Administrative Order

Dear Ms. Atkinson:

During the January 25, 2018 meeting between the Pennsylvania Department of Environmental Protection (the “Department”) and Sunoco Pipeline L.P. (“SPLP”), the Department requested additional information regarding certain components of SPLP’s response to the Administrative Order issued by on January 3, 2018 (the “Order”). This submission provides the additional information requested by the Department and supplements SPLP’s responses to the Order dated January 12, and January 22, 2018:

- **Paragraph 2** – The Department requested that SPLP modify the introductory section and section headings in the narrative of the Trenchless Construction Methodologies report and the corresponding summary chart (i.e. **Exhibit “A”**). A revised version of **Exhibit “A”** is attached.
- **Paragraph 3** – A representative of the Department identified several streams during the January 25 meeting, stating that the designations or seasonal restrictions listed on **Exhibit “1”** of the identified trout streams were incorrect. With respect to one of the identified streams, Shamona Creek, **Exhibit “1”** listed it as TNR (trout naturally reproducing) but having no seasonal restriction. That entry is correct. Wild trout stream restrictions are not needed on Shamona Creek watershed due to the use of horizontal directional drilling used to cross this creek, which was previously confirmed in writing by the Pennsylvania Fish and Boat Commission (“PAFBC”). (See attached letter from the PAFBC dated August 1, 2016.) The PAFBC letter was previously provided to the Department as Attachment 6C to the permit application package.

At the meeting on January 25, the Department also stated that streams S-M70, M72, M74-M78, M80, and S-L84 all should have a seasonal restriction for construction listed on **Exhibit “1,”** which was not indicated on the previously submitted **Exhibit “1.”** Streams S-M70, M72, M74-M78, and M80 are all tributaries to Dry Run, and stream S-

L84 is Dry Run, which is a tributary to Blair Gap Run. Previous submissions of the applications to the Department in 8/2015 (initial) and 5/2016 (completeness response) had these streams classified as drains to a stocked trout stream (“STS”) according to PAFBC data. However, by review letter dated October 6, 2015, Gary Smith of the PAFBC determined that Dry Run was not a wild trout stream nor a stocked trout stream. (See attached letter) The PAFBC letter was previously submitted to the Department as Attachment 6C of the permit application, and sent directly by PAFBC to Andrew McDonald of the Department. Despite PAFBC’s determination regarding these streams, the Department’s September 6, 2016 technical deficiency letter (comment 83, relevant pages attached) requested that the designation of certain wetlands located along these streams be identified as Exceptional Value, so the application materials for these streams were identified as “drains to TNR” in response to the Department’s application comments. Therefore, the information previously set forth on **Exhibit “1”** for these streams correctly represents the information submitted to the Department in support of the permits.

- **Paragraph 4** – The Department requested that SPLP provide a narrative explanation regarding the bore method used for the Q75 crossing (Upper Uwchlan Township, Chester County) that was listed in **Exhibit “2”** to the Order. The trenchless construction method used in this location was an auger bore with a hydraulic hammer attached to the end of the casing, which was necessary because of the particular geological conditions at the site. In addition, the Department noted inadvertent errors in the construction dates listed for the A56/S-A87 crossing (West Cocalico Township, Lancaster County) and the J54/S-J59 crossing (West Cocalico Township, Lancaster County). SPLP has reviewed and confirmed all construction dates on **Exhibit “2,”** including these two crossings.¹ A revised version of **Exhibit “2”** is attached.
- **Paragraph 5** – The Department noted certain typographical errors in the spreadsheet providing a summary of the HDD contractors and subcontractors (i.e. **Exhibit “B”**). A revised version of **Exhibit “B”** is attached.
- **Paragraph 9** – The Department requested that SPLP incorporate certain additional clarifying revisions to the Operations Plan (i.e., **Exhibit “E”**). Revised redline and clean versions of the Operations Plan are attached.

¹ SPLP has also reviewed and confirmed all construction dates listed in the previously-submitted **Exhibit “1”** list of trout stream crossings.

Aneca Atkison
January 29, 2018
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Lastly, the Department requested that SPLP modify the Daily Activities Sheet to include station numbers that correspond to the erosion and sediment control plan drawings for the project, and where applicable, to list HDD numbers for related tasks. SPLP has included this information on a revised version of the Daily Activities Sheet, which have been uploaded to the Department's FTP site.

Sincerely,



Matthew Gordon
Project Manager
Energy Transfer

Enclosure

cc: Ramez Ziadeh, P.E. – rziadeh@pa.gov

List of Referenced Exhibits

- ***Revised Exhibit A*** – Para. 2: Trenchless Construction Methodologies, with summary chart
- **PA Fish and Boat Commission Letters**
 - August 1, 2016 PA Fish and Boat Commission Letter
 - October 6, 2015 PA Fish and Boat Commission Letter
 - September 6, 2016 Technical Deficiency Letter, relevant excerpts
- ***Revised Exhibit 2*** – Para. 4: Changes in Construction Methodology
- ***Revised Exhibit B*** – Para. 5: List of HDD Contractors and Subcontractors
- ***Revised Exhibit E*** – Para. 9: Operations Plan