

MEMO

TO: Eric Gustafson *EGD 3/16/17*
District Oil and Gas Manager
Southwest Oil and Gas District

FROM: Donna D. Davis *DD*
Environmental Engineer
Southwest Oil and Gas District

DATE: September 14, 2016

**RE: Technical Review of the Erosion and Sedimentation Plan
And Post Construction Stormwater Management Plan,
June 13, 2016 submissions from PGE and
Stiffler McGraw for the Yanity Injection Well
Grant Township, Indiana County**

Remarks: I have reviewed the above referenced response to the Notice of Incomplete Application, concerning the Erosion and Sedimentation (E&S) Plan and the Post Construction Stormwater Management Plan (PCSM) plan submitted for the Vanity PGE site. Due to the strip mine legacy on this site, PGE is proposing to have lined detention basins because infiltration is prohibited on strip mines (Section 7.5 of the Stormwater Manual). They are proposing to contain the runoff in 3 lined basins and reuse the water for various uses as outlined in their water budget plan. This is BMP 6.5.2 Runoff Capture and Reuse. While this is an unusual proposal for an industrial site, there is nothing in the Stormwater Manual which prohibits this use.

The proposed water budget is conservative, as they propose to use approximately twice the amount of water that will theoretically be generated through stormwater runoff. They propose to use the water for dust suppression, well maintenance activities and pluggings/completions/drilling operations at PGE sites in Indiana, Potter, McKean, Warren and Forest Counties.

With the June 28, 2016 submission, PGE meets the requirements for Erosion and Sedimentation control and Post Construction Stormwater Management as per 25 PA Code Chapter 102.