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PA Department of Environmental Protection
Northeast Regional Office
Waterways and Wetlands Program
2 Public Square
Wilks-Barre, PA 18701
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Re: Atlantic Sunrise Project – Chapter 105 Water Obstruction and Encroachment permit applications and Chapter 102 ESCGP2 NOI

To Whom it May Concern:

The Mehoopany Creek Watershed is a 134.5 square mile area that includes Bradford, Luzerne, Sullivan and Wyoming Counties. The Mehoopany Creek Watershed Association is actively engaged in activities to improve water quality, wildlife and aquatic life habitats, increase recreational opportunities, maintain areas free of litter, monitor water quality and stream restoration projects. The MCWA was formed in 1999. We publish an annual newsletter and have our annual fundraiser on Trout Day. All of our fundraising efforts benefit our projects to improve water quality. We regularly partner with DEP (Growing Greener Grants), EPCAMR, PGC, White Tails Unlimited and North Branch Trout Derby Association in projects that improve water quality, animal habitat and recreational opportunities within our watershed.

The area of Mehoopany Creek Watershed hosts 100+/- wells on 37 well pads along with impoundment, water withdrawal (Susquehanna River near our confluence), compressor station, unregulated for safety purposes Class 1 Area gathering lines and other above ground gathering line infrastructure locations. In many cases, these facilities are near our homes and school. It is unknown whether or to what extent the Atlantic Sunrise Project will result in further

gathering system or well pad build-out within our watershed. MCWA membership includes both leased and non-leased landowners; nevertheless they are landowners who are concerned about the environment and the impacts of pipeline projects and well development.

This is a very large pipeline project covering ten counties within Pennsylvania. This isn't the first pipeline that Williams has constructed within Pennsylvania within even the last five years. Williams or their contractors it would seem by now, especially since they've been visible within our county for more than five years would be able to submit DEP applications lacking so many deficiencies. That's our first concern. We appreciate DEP staff's careful review, but that no way lessens the fact that Williams needs to do a better job with their application preparation.

This pipeline project, at least the Wyoming County portion is being reviewed and possibly enforcement will also be the venue of the NERO. Thus, we want to bring a few items to your attention.

- **Co-location** – Williams has operated the Springville Gathering Line in Wyoming County since 2012. Now the majority of the public can't really grasp the vast reserves of natural gas that are being exploited here however, the drillers and pipeline operators, primarily operators from Texas and Oklahoma do know this. They have the facts and are able to plan and design their development and transportation facilities in accordance with this information. So, why are they continuing to build numerous pipelines where they could have one? And one in a much narrower ROW rather than widening and creating more fragmentation? A prime example is the Springville Gathering Line. This pipeline is a 24" diameter that crosses well over 100, possibly even 200 river, stream and wetland crossings since there were violations where crossings were overlooked originally. Even with the higher scrutiny of the DEP/ACE joint

permit, the entire route wasn't walked by either regulator during the permitting process; numerous crossings were missed, who knows how many threatened and endangered species? Anyway, it was very likely that the drillers and probably Williams knew then they were going to need to route another pipeline project through Wyoming County. Now, they are co-locating this pipeline in part with the Springville Gathering Line through Wyoming County. But, let's be clear, this is not exactly co-location that many citizens advocated for during the Pipeline Infrastructure Task Force process. This is enlarging, widening the ROW. Better regulations are needed. Williams could have and should have run a larger diameter pipeline through this area years ago in preparation for this large project. Instead now, they are co-locating and widening the ROW and adding another metering station in a location where people have complained about odors at the existing metering location. This is senseless. We need to have mechanisms in place to avoid this intermittent construction program.

Additionally, the Department needs to be cognizant of what occurs in forested areas when trees are removed for wide ROW. Within 100' of the clearing, the forest is weakened and trees continue to fall within and outside of the ROW. Landowners are dismayed to see the continuation of tree loss after the pipeline construction. Some landowners are unhappy that the operator doesn't keep their ROW free from fallen trees.

- **Higher level of environmental scrutiny** – there's a more thorough review happening with this pipeline than what occurred with the Springville Gathering Line. There was no public comment or lengthy review of that gathering pipeline or any of the thousands of miles of gathering pipelines within Pennsylvania. This is unacceptable. Gathering lines previously installed and in the future are contributing to environmental impacts and fragmentation with ROW of similar width and

combined miles far exceeding this project as located within Susquehanna and Wyoming counties gas fields. This two tiered standard has been unacceptable for more than ten years now and remains so. While approval for the Springville Gathering Line did take longer than Williams expected, in that case also, Williams was deficient in their application. However, at public meetings, they stated that DEP was delaying their permit!

- **Violations** – Williams incurred many violations once the insufficiently staffed DEP actually had time to review their work. Even while the construction was happening, Williams was incurring violations along this line. Violations due to grubbing the entire line (approximately 30 miles) during the rainy season resulted in extensive and unnecessary erosion and sedimentation issues. Additionally, their insufficient E&S measures resulted in events such as water run-off flowing into homes or on adjacent properties. This must not reoccur with the Atlantic Sunrise Project construction. Williams paid \$169,648 for violations that were incurred during the period in which the Springville Gathering Line was constructed. It is well known that penalties are an instrument of negotiations and so the actual extent of their environmental impact is publicly unknown. <https://stateimpact.npr.org/pennsylvania/2014/02/27/dep-fined-oil-and-gas-companies-2-5-million-last-year/>
- **Endangered Species** – Williams often touts and likes to emphasis at FERC meetings their concern for endangered species. However, the actual practice is that their employees talk with disgust, complaining about endangered species that are a nuisance to them. So much in fact, they have the rural population here thinking that endangered species are nothing more than a nuisance rather than how healthy our area is because endangered species are indeed found here. So, with the operator’s boots on the ground having such an attitude about endangered

species we are very concerned about the likelihood that for example very small, tiny, threatened and endangered bats are even picked up in their surveys. The public can't possibly expect the underfunded, understaffed DEP to have adequate staffing to verify these surveys are correct or the DCNR, PGC, PFBC for that matter, also having staffing and funding problems.

- **Re-vegetation of pipeline rights of way** – We want to caution the Department to really take a close look at seed mixes Williams is planning on using in the ROW. Previously, as reported <http://www.endlessmtnlifestyles.com/?p=6318>

"Cooperative Extension Provides Update on 'Mean Weeds'

The commissioners attended a seminar at Keystone College on Nov. 1 at which Paul Brown spoke about "mean weeds," such as foxtail, that can be toxic and otherwise harmful to farm animals and pets. Some of these perennials were introduced to new areas in the region during the course of natural gas construction.

"They didn't know that they were harmful," Henry said of the contractors' planting of the weeds.

Varieties of rye grass that are often used to produce quick ground cover to mitigate erosion contained seeds from noxious plants including foxtail. Brown's Labrador retriever ingested some of the barbed seed heads from the plants and almost died after they became lodged in the animal's system. In other cases, the seed heads are known to get into an animals ears, eyes, nose and mouth, where they become especially irritable.

The purpose of the seminar was to make people aware of "mean weeds" so that such plants can be identified and eradicated. The most positive information gleaned from the seminar, Mead suggested, was that such plants grow weaker and reproduce less over time."

The Department needs to pay special attention to this matter as we do not need more invasive species that generally will not be effectively eradicated. Also, another issue that the Department must be made aware of is effective communication with organic farmers. There have been past instances where seeds or seeding was unsuitable for their farm operations and resulted in fields needing to be reseeded.

- **Water Obstruction and Erosion & Sedimentation** - There has been numerous issues with the Springville Gathering Line relating to water obstruction and erosion and sedimentation. We urge the NERO to please, please consult with the NCRO Oil and Gas Program as they were handling the permitting and enforcement of this gathering line. The issues extended for years and possibly still modifications are being made to correct issues. We fully expect a repeat of these problems unless the NERO is fully aware of the past problem locations.

"The Wyoming County portion of the Project consists of 26.4 miles of new 30-inch pipeline to be constructed in a 90-foot construction right-of-way. Additionally as part of the project there will be one contractor yard totaling 14.5 acres, 10 staging areas totaling 7.5 acres, one new Compressor Station (Compressor Station in Clinton Township), one new Meter Station (Springville Meter Station in Northmoreland Township), two new mainline valves, a new communication tower at Compressor Station 605, three permanent access roads, and 19 temporary access roads. Total earth disturbance for the Project in Wyoming County is 440.79 acres."

Item Q – Risk Assessment:

According to Williams' application *"Pre-construction and post-construction runoff values (rate and volume) will not differ once construction is complete."* We find this extremely difficult to believe. According to *"The Hidden Life of Trees"* author Peter Wohlleben a mature tree can consume 130 gallons of water daily. It is a well-known fact that grasses which are the typical revegetation cover do not consume an equivalent amount of water. The Susquehanna County Conservation District staff has testified at past Pennsylvania Assembly hearings regarding the increased amount of water run-off directly due to pipeline and well pad development. This is a critical issue with consideration to storm events. While BMPs are the norm for mitigation efforts, it would be better to require Williams to be planting native shrubs and trees narrowing the ROW throughout Wyoming County and the

entire route. Once construction is completed, Williams will not need the 90' width. Unless, *unless* they are planning to expand this ROW again. If that is the case, then they need to either install a larger diameter pipeline now and not re-open the ROW for future expansion and revegetate the ROW with trees and shrubs narrowing to 35'. This has been done on DCNR property, Williams can do it too. This benefits the environment, wild life and the operator. They can do their work once and get it done.

Additionally, Williams states "*No adverse impacts to human health are anticipated.*" That is an unqualified statement for Williams to be making. They are not a public health organization, but rather an operator whose construction practices or operations may impact public health through the deterioration of air and/or water quality. There are numerous published studies and PA DOH school age asthma rates that fully indicate that there are changes within the gas fields since exploration and exploitation began that are worthy of study. Yet, our Assembly in their efforts to increase exploitation has left health studies as unfunded and un-mandated. We do not trust the gas industry, driller or pipeline operator advisements that there are no adverse impacts to human health. They are totally unqualified to make such statements or provide such assurances.

Attachment C-1

Lynelle Bennett, Wyoming County Planner requested information from Williams:

"ESCGP-2 NOI. Section E.4 provides a summary description of Site Restoration BMP's identified in the PCSM. However, the volumes of stormwater treated and acres treated columns for the majority of the BMP's refers to Section 1.2.10. I am assuming that this reference is to a section in the PCSM. Also, Section F.4 is a similar situation for the Post Construction BMP's and their volume and acres treated.

We appreciate Ms. Bennett's thorough review. We are quite dismayed that Williams didn't provide the information to her office timely. Ms. Bennett noted on the reply notification that Williams failed to provide the requested information. How can county government sufficiently do their part in this process when the applicant fails to follow-through? They can't. It's that simple. We request that Department ensure that Williams provide Ms. Bennett with the requested information and provide her with sufficient opportunity to complete her review and provide advisement to the Department prior to the issuance of this permit. Ms. Bennett's review of storm-water details is important. When Williams constructed the Springville Gathering Line in Wyoming County there were more than a few storm-water impacts due to inadequate storm-water E&S measures.

Falls Township also requested additional information in the comments section. It is unknown whether Williams complied with the township's request.

Attachment E-2

Concerns:

- As a watershed organization we really appreciate streams and wetlands that have the ecological values of EV and HQ. With so much pollution and the national and state trend for lesser environmental protections we really want these locations adequately and sufficiently protected from any undo harm.
 - Example - Impacts #2, 8 is an EV stream with a permanent impact with an open cut. This is near an existing gathering line ROW for the Regency Wyoming Natural Gas Pipeline. Is this two

permanent pipeline impacts to an EV stream? If so, this is a concern.

- Example - Impact #10 is a permanent impact to a wetland. Wetlands are extremely important to our environment. Wetlands are continually being lost throughout the United States. The state and federal governments are reluctant to protect wetlands due to political influence of energy companies. This site is also near the Regency gathering line. This is a concern.
- Example - Impacts #4, 12 are permanent dam and pump locations? We are concerned about permanent alterations to HQ, EV, Class A Wild Trout Waters and Wild Trout Waters streams.
 - There are a number of impacts noted such as these above that as a watershed association we are questioning the reason for permanent impacts to EV, HQ, Class A Wild Trout Waters and Wild Trout Waters streams in this new route. We ask the Department to very carefully review these.
 - Also, John Levitsky of the Luzerne County Conservation District is the local expert on Bowmans Creek and Leonards Creek watersheds. He is very familiar with these streams through his work career in the environmental conservation field. Through his employment with the Luzerne County Conservation District he is directly involved with stream sampling in conjunction with Trout Unlimited. It is of great value to consult with John in these EV, HQ, Class A Wild Trout Waters and Wild Trout Waters.

- We are very concerned about the amount of riparian buffer lost along these streams – EV, HQ, Class A Wild Trout Waters and Wild Trout Waters. Riparian buffers cool streams supporting the trout habitat. We question the manner in which crossings are being proposed that will remove riparian buffers. The DEP, DCNR and PA Department of Agriculture are focused on adding to Susquehanna Basin riparian buffers, not the removal of them. So, please consult with John Levitsky of the Luzerne County Conservation District as a local expert and resource.
- Impacts #116, 117 are a contingency Susquehanna River crossing plan to utilize a cofferdam. This is an area where the riparian buffer is limited along with the active railroad ROW. So, within the contingency plan, we recommend that Williams plant trees to re-establish the riparian buffer they will destroy – as a contingency. The Susquehanna River is among the most flood prone rivers in the nation. Wyoming County has seen its fair share of flooding including during the 2011 Williams construction of the Springville Gathering Line. A mature tree can consume more than 130 gallons of water daily. This is reason alone to reestablish trees.
- Additionally, we request that the Department do all that is environmentally possible that in case there are HDD problems resolution other than cofferdam be the first plan of action. With the historical nature of flooding it is well known that propane tanks and other hazards are transported in the river during floods. A too shallow pipeline that could be potentially become uncovered and impacted by debris or explosive tanks presents a

public health & safety and environmental hazard. We truly want a successful HDD experience. Williams crossed the river upstream from this location in 2011 so they have experience and available information. The Department also has information regarding the policing of that HDD site and the inspection staff needs to be familiar with what occurred in the past. We strongly recommend that Department personnel are on the ground at this location rather than delegating such an important assignment to the county conservation district staff as they lack experience with pipeline environmental enforcement.

- We express concern that should Williams need to rely on the contingency plan that bearing in mind floods and their frequencies that a cofferdam may not provide the ability to bury the pipeline at an adequate depth for public safety and environmental protection.
- Also, the proposal notes that Williams plans to “Within this wetland, a 30-foot-wide corridor centered over the pipeline will be permanently converted from forested to scrub-shrub or emergent wetland; the remainder of the wetland will be allowed to fully revert back to PFO.” Forested wetlands role in our watersheds is different from that of scrub-shrub or emergent wetlands. Wetlands nationwide are on the decline. More and more we are finding that wetlands are a pollution cleaner. We therefore, recommend that Williams do some off-site work that will offset the actual loss of the forested wetlands. With consideration to declining wetlands, this offset is of tremendous importance.

Attachment J-1

The narrative states that the ROW in the shared areas will be 90', of which they are using 5' from the existing ROWs and widening 85'. While we applaud the idea of co-location, this isn't what we had in mind. This is essentially adding to forest fragmentation and opening a wider area for invasive species. Additionally, again it is less trees to soak up storm-water run-off. It is important to note that the forest is weakened along the ROWs. Tree blowdowns along ROWs are common within 100' of the ROW. Thus, this additional 85' is going to affect essentially 100' more on each side of the ROW. Again, we advocate Williams plant trees and reestablishes the forested areas. We recommend local seeding and straw cover to avoid introduction of invasive species.

Additionally, where the 'shared ROW' is proposed the entire width will be approximately 160+/- feet. There is no reason for this widening. Williams has experience with multiple pipelines in ROWs narrower than this. The machines are available and qualified operators are able to maneuver in a smaller area than 160'.

Attachment L-5

Williams plans to utilize 2.592 MGD maximum daily withdrawal directly from the North Branch Susquehanna River for hydrostatic testing. They have a water withdrawal plan. We recommend that the same requirements that a standing gas industry withdrawal site would need to meet apply here. We also request that drought conditions, low-water conditions that would provide for a pass-by also apply at this location.

Attachment Q

We are disappointed that none of the Wyoming County mitigations are actually being done within Wyoming County. With four watersheds (Bowmans, Mehoopany, Meshoppen, Tunkhannock) there is ample opportunity for mitigations to be accomplished with our county. Our watershed association is actively engaged. MCWA presently has several projects (including stream restoration, improving water quality and animal habitat) and have others on our 'wish list' one of which would benefit the riparian buffer of two streams and a local state highway. This site is one of continual erosion of a riparian buffer (also provides protection of the state highway) we'd like to address but have a lack of funds. We desire to have the opportunity to share our knowledge with Williams. If there is any way we can meet with Williams to discuss this small project, please contact us. (570.637.0972) We'd truly like to see a mitigation project that is mitigating Wyoming County impacts within Wyoming County. The proposed projects are located in Bradford and Lycoming Counties. Lycoming County is not an adjacent county and is in the West Branch Susquehanna River Watershed. All Wyoming County watersheds are part of the North Branch Susquehanna River Watershed.

Pipeline Safety, Increasing Potential for Pipeline Failure

One concern worthy of mention, albeit beyond the scope of these permits is the fact that in Wyoming County there is a section in Northmoreland Township where there is a shared ROW with the existing Williams' Springville Gathering Line. This line is in an unregulated Class 1 Area in regards to pipeline safety regulations. In Monroe Township there is a shared ROW with the Regency's Wyoming Natural Gas Pipeline, also an unregulated Class 1 Area gathering line.

The Commonwealth of Pennsylvania despite recommendations from the Marcellus Shale Advisory Commission (2011), GAO Report on Pipeline Safety 2012, GAO Report on O&G Transportation 2014, and the Pipeline Safety Infrastructure Task Force in 2016; all recommending rural Class 1 Area gathering lines be regulated for safety purposes, the Pennsylvania Assembly has failed to act. In fact, as of this writing, the Assembly has failed to even mandate PA One Call for rural Class 1 Area gathering lines despite a worker's death in 2015. For several legislative sessions there have been bills to both mandate PA One Call and regulate Class 1 Areas for safety purposes, yet the Assembly has failed to act. Regardless, these two expanding ROW areas in Northmoreland and Monroe townships are now essentially dual purposed with regulated and non-regulated pipelines for safety measures.

We are quite concerned about this since Williams' Unityville pipeline failure in 2015. The pipeline was installed in 1963 prior to the modern pipeline safety laws. The two existing gathering line segments mentioned previously were also installed lacking any pipeline safety laws or governmental oversight, and are also of similar size and pressure. According to the NTSB Report, cracking and external corrosion and protective covering deterioration were to blame for this failure. In other words, Williams didn't either sufficiently maintain or monitor this pipeline to avoid pipeline failure. We're concerned how maintenance on the non-regulated gathering lines where there are no requirements may affect the overall safety of both pipelines, (meaning to include the new proposed Atlantic Sunrise Project Central Penn North Pipeline) within the shared ROW. https://www.phmsa.dot.gov/staticfiles//PHMSA/PipelineFailureReports/150663_Transcontinental_Unityville_PA_June_9_2015.pdf

Pipeline failures also result in environmental impacts. Impacts to water quality, streams, wetlands and air quality are among the concerns we have in addition to public health and safety.

Tree Planting

In a recent presentation by Kirk Jalbert of Fracktracker.org he offered the following statistics pertaining to the Susquehanna River Basin.

- 30,000 miles of pipeline to be constructed within the Susquehanna Basin within the next 20 years.
- DEP currently has 4,600 miles of new pipeline proposals now.
- The total acreage of development will be more than our entire Pennsylvania State Parks system.
- Presently, there are 5,500 wells on 2,000 well pads in the Susquehanna Basin, which only the northern reaches of the Middle Susquehanna are in the gas development area.
- The Nature Conservancy projects 27,600 more wells on 7,000 more well pads by 2030 (less than 15 years from now).
- 200,000 acres to be disturbed within the next 15 years; 22 of 30 acres result in deforestation.

While we don't have the figures on the current level of disturbance, we hope that the Department has been tracking the development. Our members live within the development area and have a very good knowledge of the level of changes we are experiencing. From the above bullet points, we think you may understand that we are a concerned watershed organization that does have unconventional drilling within our watershed. (~37 well pads, ~100 wells, plus facilities) One suggestion we strongly advocate is this. Williams and every other pipeline and well operator needs to have a thorough understanding that we want them planting trees. We want them planting trees.

Pipelines through forested areas result in deforestation and forest fragmentation. Everywhere a pipeline ROW is routed through the forest,

that forest is weakened. Wind now has a tunnel through the forest where before leaves, limbs and boughs softened its affect throughout the forest. Now, we see the general weakening and falling of trees outside of the ROW as much as 100' within the forest. Williams' application even noted that tree removal sometimes results in leaning trees or trees falling outside of the ROW during construction and they want to remove anything 20' outside of the negotiated ROW. This consideration results in a fact that it is extremely difficult to determine at any given time the exact impact of pipelines to our forests. It is certainly beyond the impact of any given ROW acreage. There are trees most definitely affected by the construction, including access roads. We see these trees; it may take more than one growing season, but they never recover from having roots severed and they die. This is perhaps an unintended but very real forest impact resulting from pipeline construction. Trees play a dramatic role in our environment, in ways that are especially beneficial to Wyoming County and the Mehoopany Creek Watershed.

- A mature tree can consume more than 130 gallons of water daily. (43)
- Trees transpire, they breathe out water vapor. "In the case of a mature beech, the tree exhales hundreds of gallons of water a day." (57) (contributing to stable weather)
- Recent research discovered that "Trees pump themselves so full of water their trunks sometimes increase in diameter." (58)
- "In intact forests, the soil under the trees becomes deeper and richer over time so that growing conditions for trees constantly improve." (87) Thus, removing trees weakens the growing conditions of the forest.
- Trees "store up to 22 tons of carbon dioxide in their trunks, branches, and root systems. The forest is really a gigantic carbon dioxide

vacuum that constantly filters out and stores this component of the air.” (93) Trees are very important in regards to CO2 which is one emission that is controllable within gas industry including transportation facilities. Another reason the gas industry needs to be aggressively planting trees. Pipelines, well pads and facilities all have a direct relationship to the removal of trees and decreasing this environmental benefit of trees.

- “During a severe storm, a mature tree, (for example, beech) can down an additional couple hundred gallons of water that, thanks to its construction, it funnels to its roots. There, the water is stored in the surrounding soil, where it can help the tree over the next few dry spells.” (102)
- Deciduous forests are able to consume more rain than spruce and firs.
- “The forest offers more important service to streams. The water in a stream is susceptible to greater temperature variations than spring water, which is continuously replaced with cool groundwater. ” (109) Deciduous trees allow warmth to penetrate streams during the winter, in the spring, they unfurl their leaves and shade the running water. This is particularly important for aquatic life, salamanders and trout. Williams needs to be cognizant of this with the numerous open cut EV, HQ, Class A Wild Trout Waters and Wild Trout Waters streams and wetlands they are proposing. We urge the Department to really take a close look at their proposal and our suggestions and information provided during this comment period.
- “Per year and square mile of alder forest, these tiny helpers can extract up to 87 tons of nitrogen from the air and make it available to the roots of their tree friends.” (144) Well and pipeline operators are the largest polluters of NOx in our rural northern gas fields. They need to befriend trees and plant them.

- “And a whole lot of dust is blown through the forests every year. A mature tree can filter out more than 200 pounds, which rain flushes down its trunk.” (167) This is very important considering the increasing amounts of particulate matter in our air and its effects on public health.

All page references are from "The Hidden Life of Trees", by Peter Whollenben.

- Invasive species, woolly adelgid, emerald ash borer and other species are also impacting our forest lands.
- Trees are a valuable resource in our forests through benefiting other animals, plants and organisms.

We've noted a very powerful argument throughout our comment for Williams to be required to do extensive tree planting. Trees are effective resources for retaining storm-water run-off and managing normal stream levels. Williams planting of grasses and other plants in the ROWs alters animal habitats and will increase water run-off in nearly every event of rain. There are no calculations that can effectively account for the continual impact of tree loss in Wyoming County from the continually expanding gas industry. The Department has not had the mandate to gather a comprehensive review of how our rural Pennsylvania landscapes are dramatically changing. Trees are effective filters of dust and CO₂. These are both concerns that requiring Williams to plant trees would benefit. And, The DCNR, DEP and the Department of Agriculture are all promoting the planting of riparian buffers. Yet, the applicant, Williams is intent on destroying riparian buffers in many areas along their pipeline ROW. Thus, we strongly advocate to the Department, the issuance of the permits must necessarily require an aggressive tree planting program.

The MCWA has neither opposed pipeline projects nor is opposing this one. Our members live, raise families and recreate within our watershed and have a close seat to the gas industry's operations. In full disclosure, some of our members are leased landowners. Landowners whom care about the environment and are those that are affected by the royalty rip-off and with the operation of the Atlantic Sunrise Project Central Penn North Pipeline will, should the Assembly fail to act, for all intents and purposes be ripped off more. So, we really don't have a financial interest in this pipeline. Despite our reservations, we do not oppose the pipeline but rather recommend that the Department take our suggestions seriously and include them in the permit conditions. We also recommend the Department provide the necessary on the ground oversight, especially where EV, HQ, Class A Wild Trout Waters, Wild Trout Waters and HDD locations are involved.

MCWA appreciates the diligent work the Department's staff has put into the Atlantic Sunrise Project's permit application. We appreciate the Department pointing out the applicant's deficiencies. We know the Department is struggling with staffing and adequate funding. We thank the Department for the opportunity to provide for public comments. If you should have any questions or comments, please do not hesitate to contact me.

Best Regards,



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