

June 26, 2017

Pamela R. Dobbins, P.E.
Environmental Group Manager
Pennsylvania Department of Environmental Protection
Northeast Regional Office, Wetlands & Waterways Program
2 Public Square
Wilkes-Barre, PA 18701-1915

Re: PennEast Pipeline Company, LLC
Response to the PADEP's Administrative Incompleteness Review Letter #3
DEP Application No. ESG02000160001
Luzerne, Carbon, Northampton & Bucks County

Dear Ms. Dobbins:

Pursuant to the PennEast Pipeline Project (Project) and on behalf of PennEast Pipeline Company, LLC (PennEast), AECOM respectfully submits this response to the Pennsylvania Department of Environmental Protection's (PADEP) administrative incompleteness review letter, dated December 23, 2016. AECOM has addressed the items that the PADEP listed for resubmittal or submission of additional information. The PADEP's comments are in bold font and each comment is followed by AECOM's response.

1. (Comment from Incompleteness Review #2) Luzerne County Conservation District Original Comment #3: Supporting calculations §102.8(f)(8).

No calculations have been provided in the PCSM report to justify the reduction of the increase in the 2-year 24-hour storm event. These calculations should be in the PCSM report which correlates the proposed infiltration/reuse rate for the BMP's to the infiltration/reuse rates of the receiving soils on the project site. Please provide.

PennEast has conducted additional infiltration testing at proposed aboveground facility sites in Luzerne County and will provide revised PCSM reports with the updated ESCGP-2 application.

2. (Comment from Incompleteness Review #2) Luzerne County Conservation District Original Comment #5: Supporting calculations §102.8(f)(I).

- a. **The information presented does not include the actual logs/test pit data that typically provide the test elevations, infiltration rates for each test, the depths to limiting zones such as bed rock, mottling, and other indicators of seasonal high water tables. Please provide.**

Several pieces of information have still not been provided. This includes the test elevations and rates in "in/hr." Also, testing for the Wyoming Interconnect has not yet been provided. Please provide accordingly.

PennEast has conducted infiltration testing at the proposed Wyoming Interconnect, Springville Interconnect, and Auburn & Leidy Interconnects sites in Luzerne County. Revised PCSM reports will be provided with the updated ESCGP-2 application.

The following items are new incompleteness deficiencies found as a result of the changes for application.

- 3. (Comment 3 from Incompleteness Review Letter #2) Please provide all infiltration testing/test pit logs for any proposed volume control post construction stormwater management BMPs along the project route. This should include any impervious areas (Compressor Stations, Main Line Valves, Regulator Stations, Access Roads, etc.; i.e. infiltration testing/test pits are not provided for the Kidder Compressor Station).**

The status of infiltration test/test pit excavation is as follows:

- Wyoming Interconnect
 - Testing complete. Test results will be provided in an updated ESCGP-2 application after all wetland and watercourse delineations are complete.
- Springville Interconnect
 - Testing complete; results previously provided.
- Auburn & Leidy Interconnect
 - Testing complete on revised site design. Test results will be provided in an updated ESCGP-2 application after all wetland and watercourse delineations are complete.
- Kidder Compressor Station
 - Testing complete. Test results will be provided in an updated ESCGP-2 application after all wetland and watercourse delineations are complete.
- TCO & UGI Interconnect
 - Testing not conducted, awaiting access permission. Test results will be provided in an updated ESCGP-2 application after all surveys are complete.
- Hellertown Launcher & Mainline Launcher/Receiver
 - Testing conducted; results previously provided.
- Blue Mountain Interconnect/MLV-5
 - Testing complete on revised site design. Test results will be provided in an updated ESCGP-2 application after all wetland and watercourse delineations are complete.

PennEast is prepared to complete infiltration testing at all proposed impervious areas as soon as access is granted and will promptly update the ESCGP-2 application.

- 4. (Comment 4 from Incompleteness Review #2) Upon further evaluation by the Department and in accordance with the 25 Pa. Code §102.4(b)(5)(v) and 25 Pa. Code §102.8(f)(5), the location of all surface waters of this Commonwealth, including wetlands, which may receive runoff within or from the project site and**

their classification under Chapter 93 needs to be provided through plan drawings and a narrative description.

PennEast understands that the PADEP is unwilling to accept the ESCGP-2 application as administratively complete until infiltration testing is complete and all surface waters which may receive runoff within or from the Project site are delineated. At this time, PennEast has completed delineations for a majority of the workspace in Pennsylvania (90%), but is awaiting the issuance of a Certificate of Public Convenience and Necessity from the Federal Energy Regulatory Commission (FERC) to complete the remaining surveys (8 miles of study corridor). Due to unanticipated delays in the FERC review process that are beyond PennEast's control, PennEast respectfully requests an extension to submit the modified ESCGP-2 permit application until it has the legal authority to conduct surveys on 100% of the Project workspace. PennEast anticipates submitting a revised permit application by December 29, 2017.

Thank you for your time and effort in reviewing the ESCGP-2 application. We look forward to continue working with the PADEP in coming months. Please feel free to call me at (610) 832-2713 if you need any additional information.

Sincerely,

AECOM



Sarah Binckley
Biologist

cc: Domenic Rocco, PADEP Southeast Regional Office
Heather Graham, Luzerne Conservation District
Chris Storm, Carbon County Conservation District
Sharon Pletchan, Northampton County Conservation District
Rene Moyer, Bucks County Conservation District
Jeff England, UGI Energy Services
Michael Wilcox, PE, Mott MacDonald