



July 10, 2020

National Fuel Gas Supply Corporation  
c/o Wayne Graham  
1100 State Street  
Erie, PA 16512

Re: Technical Deficiency Notification  
Water Obstruction & Encroachment Permits  
FM100 Project

DEP Application No. E1283219-001 (Cameron County)  
APS ID No. 1007394; AUTH ID No. 1298296

DEP Application No. E1783219-001 (Clearfield County)  
APS ID No. 1007462; AUTH ID No. 1298427

DEP Application No. E2483219-001 (Elk County)  
APS ID No. 1007488; AUTH ID No. 1298479

DEP Application No. E4283219-001 (McKean County)  
APS ID No. 1007797; AUTH ID No. 1299051

DEP Application No. E5383219-001 (Potter County)  
APS ID No. 1007801; AUTH ID No. 1299057

Dear Mr. Graham:

The Department of Environmental Protection (DEP) has reviewed the above referenced application and has identified the following technical deficiencies. **Chapter 105 Dam Safety and Waterway Management regulations** includes information that will aid you in responding to some of the deficiencies listed below. The deficiencies are based on applicable laws and regulations, and the guidance sets forth the DEP's established means of satisfying the applicable regulatory and statutory requirements.

It should also be noted that the Pennsylvania Fish and Boat Commission technical review for this project is ongoing, and their comments will be forwarded upon receipt for response.

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### Technical Deficiencies

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### All Counties

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1. Please consider providing consistent stationing for all pipelines. The FM100 Abandonment Project PADEP – Soil Erosion and Sediment Control Plan (Abandonment E&S Plan) references both pipeline mileposts and pipeline stationing, the FM100 Modernization Project PADEP - Soil Erosion and Sediment Control Plan (Modernization E&S Plan) references pipeline stations, the FM100 Abandonment Project Water Obstruction and Encroachment Permit Application Site – Specific Drawings (Ch. 105 Abandonment Plan) references pipeline mileposts, the FM100 Modernization Project Water Obstruction and Encroachment Permit Application Site – Specific Drawings (Ch. 105 Modernization Plan) references pipeline stationing and many of the tables in the 105: Water Obstruction and Encroachment Permit Comprehensive Environmental Assessment (E.A.) reference pipeline mileposts. [25. Pa. Code §105.21(a)(1)]
2. Section 1.6.1.1 of the E.A. states that: “In cases where the pipe will be abandoned in-place grouting with expandable foam may be used at certain road/railroad crossings, waterbodies, wetlands, and other locations to plug the pipeline and avoid creating a conduit for water.” Please provide a table that lists the beginning and ending station of all pipes to be abandoned in place. The table should indicate if grouting, foam or nothing is to be used and provide justification for the chosen option. [25. Pa. Code §105.21(a)(1)]
3. The October 8, 2019 letter from Pennsylvania Fish & Boat Commission references specific conservation measures and best management practices from the report prepared by Herpetological Associates (i.e. – for Timber Rattlesnake). It is not clear what these measures are and how they have been incorporated into the plan. Please clarify. [25. Pa. Code §105.21(a)(1)]
4. Tree cutting restrictions were listed by the Pennsylvania Game Commission (PGC) in the April 29, 2019 letter for the Silver-haired Bat in Clearfield and Elk counties, but these don’t appear to be listed or addressed in plans. Please clarify. [25. Pa. Code §105.21(a)(1)]
5. The April 29, 2019 PGC letter also listed potential impacts to State Game Lands, Numbers 34, 59 and 61. They requested the Land Management Supervisor, Mr. William Dingman, to be contacted to discuss and coordinate the project on these lands. There is no documentation in the application that this was done. Please provide. [25. Pa. Code §105.21(a)(1)]
6. Please provide more information on the grouting process. If a concrete washout is needed, please include on the plan. Otherwise please clarify how grouting will be performed without a concrete washout. [25. Pa. Code §105.13(g)]
7. Please provide information on abandonment and flowable fill used for grouting. Will concrete washout areas need to be included where grouting is done? [25. Pa. Code §105.21(a)(1)]

8. A profile BMP Ribbon is requested to be placed on the Plan Drawings. [25. Pa. Code §105.21(a)(1)]
9. Please show on the E&S Plans the crossing method to be utilized (i.e. Flumed, Pump Bypass, etc.), across streams and wetlands. [25. Pa. Code §105.13(g)]
10. Please show the restoration methods at each stream and wetland crossing. [25. Pa. Code §105.13(g)]
11. Please clarify what details will be utilized during construction – those provided with the Modernization E&S Plans and Abandonment E&S Plans or those in the Erosion and Sediment Control Agricultural Mitigation Plan (ESCAMP)? There are differences and inclusions/exclusions between the two sets of details. For example; the Streambank Stabilization, ESCAMP BMP Drawing No. 7 shows rock riprap while the Modernization E&S Plan Detail Figure 18 shows natural streambed material. Please ensure all details are consistent and accurate. [25. Pa. Code §105.21(a)(1)]
12. Please review the Modernization E&S Plan notes, Abandonment E&S Plan notes and ESCAMP Plan Detail notes to ensure consistency. For example, Modernization E&S Plan General E&S Note #14 mentions sites will be stabilized within 4 days of activity cessation, but ESCAMP section 4.6 allows activity to be ceased for 20 days prior to requiring stabilization. Please eliminate any inconsistencies. [25. Pa. Code §105.21(a)(1)]
13. Drawing Notes 005 - Post Construction Sequence establishes permanent stabilization prior to removal of temporary wetland and stream crossings. Permanent stabilization would be disturbed upon moving contractors back in to remove the temporary crossings. Please review and revise accordingly. [25. Pa. Code §105.13(g)]
14. Wetland Crossing ESCAMP 4/4a Detail does not show filter fabric underlayment per the PA E&S BMP Manual. All BMP details need to conform with the standards of this manual. Additionally, Modernization E&S Plan Detail Figure 23 does not show a filter fabric underlayment. Please review and revise accordingly. [25. Pa. Code §105.13(g)]
15. Throughout the applications, impacts to floodplains are described and referenced. Please review the definitions of floodway and floodplain in §105.1 and clarify which of the proposed impacts will affect floodways. Please revise and resubmit associated tables/information as necessary. [25 Pa. Code §§105.13(e)(1)(i) and 105.21(a)(1)]
16. Please provide an explicit statement on water dependency. [25 Pa. Code §105.13(e)(1)(iii)(D)] and E.A. Form Instructions, Module S1.B.2 (DEP Doc. No. 3150-PM-BWEW0017, Rev. 6/2017)

17. Please provide a subfacility details table(s) (county specific) for all proposed water obstruction(s) and encroachment activities, including any required details in accordance with the E.A. Form Instructions - Module S3.C, and E.A. Form Instructions - Appendices IV and V. [25 Pa. Code §105.15(c)] and E.A. Form Instructions, Module S3.C (DEP Doc. No. 3150-PM-BWEW0017, Rev. 6/2017)
18. The E.A. Narrative has a “DRAFT” watermark that begins on page 60 of the document (page 70 of the PDF) and continues throughout the rest of the document. Please provide a finalized E.A. Narrative inclusive of any edits/modifications made as a result of this Technical Deficiency Letter. [25 Pa. Code §105.15(c)]
19. In the E.A. Narrative, footnotes 3-10 are missing for Table 3.3-1 located on pages 78-79 of the document (pages 88-89 of the PDF). Please provide a revised table with all applicable footnotes. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
20. Throughout the application documents (narrative, tables, drawings, attachments, etc.) there are several inconsistencies/errors within and between the documents with respect to the stream names, stream and wetland classifications, wetland types, and stream and wetland impact acreages. Please review all associated documents/information and revise as necessary so that all resource information and proposed impacts are consistent and accurate throughout the application. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
21. Regarding the PHMC correspondence for the project, two letters from PHMC were provided with the application: ER 2017-2279-042-E dated June 27, 2019, and ER 2017-2279-042-G dated October 8, 2019. Please provide all PHMC correspondence and associated responses relating to this project, including ER 2017-2279-042-A, B, C, D, and F. [25 Pa. Code §§105.14(b)(5) and 105.21(a)(1)]
22. In the Wetland Investigation Report Narrative, footnote 2 is missing for Table 4.2-3 located on pages 21-22 of the document (page 29-30 of the PDF). Please provide the missing footnote. [25 Pa. Code §105.21(a)(1)]
23. The Wetland Determination Data Form for Sampling Point WD233TMM does not include coordinates, county, or soil unit type information. This sampling point also is not shown on the delineation maps in Figure 4.1-1, and no photographs appear to be included. In addition, based on the information provided, the soils do not meet the criteria for a Depleted Matrix (F3). Please submit a revised data form inclusive of the missing information and the correct soil indicator(s) present. Please also submit a revised map from Figure 4.1-1 depicting where this sampling point is located. [25 Pa. Code §§105.13(e)(1)(x), 105.21(a)(1) and 105.451]
24. The Wetland Determination Data Forms for Sampling Points WD234TMM, WD235TMM, WD236TMM, and WD237TMM do not include coordinates, county, or soil unit type information. These sampling points also are not shown on

the delineation maps in Figure 4.1-1, and no photographs appear to be included. Please submit revised data forms inclusive of the missing information. Please also submit revised maps from Figure 4.1-1 depicting where these sampling points are located. [25 Pa. Code §§105.13(e)(1)(x), 105.21(a)(1) and 105.451]

25. The Wetland Determination Data Form for Sampling Point WD238TMM does not include coordinates, county, or soil unit type information. This sampling point also is not shown on the delineation maps in Figure 4.1-1, and no photographs appear to be included. In addition, the indicator status shown on the form for *Salix nigra* is incorrect. Please submit a revised data form inclusive of the missing information and the correct indicator status for *Salix nigra*. Please also submit a revised map from Figure 4.1-1 depicting where this sampling point is located. [25 Pa. Code §§105.13(e)(1)(x), 105.21(a)(1) and 105.451]
26. The Ch. 105 Modernization Plan Index sheet 4 of 7 indicates that there is a sheet WSS-MCK-AR-059, however that sheet is not included with the submitted plans. Please include the missing sheet or revise the Index sheet. [25 Pa. Code §105.21(a)(1)]
27. Appendix J: HDD and IR Contingency Plan, Section 1.1, references Attachment 2.E-1. This attachment, which should contain supporting drawings, hydrofracture analysis, geotechnical reports and profile figures could not be located. Please include this attachment. [25 Pa. Code §105.21(a)(1)]
28. Appendix J: HDD and IR Contingency Plan, Section 1.1, references note pages for each specific drill. These notes, which should contain hydrofracture/hydraulic fracture evaluations for all HDDs to define allowable drilling fluid pressures based overlaying geotechnical material strength, could not be located. Please include these note pages. [25 Pa. Code §105.21(a)(1)]
29. Appendix J: Horizontal Directional Drill and Inadvertent Return Contingency Plan includes Table 1.12-1: Agency/Stakeholder Notifications. The table contains outdated contact information for the Regional Permit Coordination Office (RPCO). The Pennsylvania Department of Environmental Quality should be changed to the PA Department of Environmental Protection and the RPCO contact person should be changed from Lisa Dorman to Regional Permit Coordination Office, 717.722.5987, RA-EPREGIONALPERMIT@pa.gov. Please review all data in the table and revise accordingly. [25 Pa. Code §105.21(a)(1)]
30. Section 2.2.1 of the E.A. states that PAGWIS database was reviewed for the presence of private wells. PAGWIS is not a source for private supply well information. Please provide record that a physical investigation was conducted to identify public and private supply wells within 400' of the HDD. Please note that some public supply wells may not be listed on PAGWIS, local municipalities and the DEP Regional office should be contacted to identify all potential public water supplies in the area. [25 Pa. Code §105.21(a)(1)]

**McKean**

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1. Please provide a description and associated details of onsite avoidance and minimization efforts that were implemented for the preferred (selected) alternative with respect to the modernization portion of the project. [25 Pa. Code §§105.14(b)(7) and 105.15(c)] and E.A. Form Instructions, Module S3.F.2-3 (DEP Doc. No. 3150-PM-BWEW0017, Rev. 6/2017)
2. As discussed in the comments regarding all counties, throughout the application documents (narrative, tables, drawings, attachments, etc.), there are several inconsistencies/errors within and between the documents. With respect to the wetland classifications (e.g. EV, Other), types (e.g. PEM, PSS, PFO, etc.) and wetland impact acreages, once corrected, the mitigation acreage must also reflect these changes. Please review all associated documents/information and revise as necessary so that all resource information, proposed impacts, and proposed mitigation is consistent and accurate throughout the application. [25 Pa. Code §§105.20a(a) and 105.21(a)(1)]
3. On page 39 of the E.A. Narrative under section 2.4.1 (page 49 of the PDF), the second paragraph from the top states “There are no wetlands intersecting proposed aboveground facilities; therefore, no wetland types will be permanently impacted by the Project.” Although there are no “aboveground facilities” that will permanently impact wetlands, the application documents detail proposed permanent conversion of PFO and PSS wetlands to maintain the pipeline, therefore having permanent wetland impacts. Please revise this section of the Narrative and any applicable associated attachments as necessary. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
4. It appears that there is a small gap in coverage in between the Ch. 105 Modernization Plan sheets WSS-MCK-ML-004 and WSS-MCK-ML-005 and that a trench plug should be located in the uncovered area. Please verify that all BMP’s are shown on the plans and make any corrections, as needed. [25 Pa. Code §105.21(a)(1)]
5. On the Ch. 105 Modernization Plan, wetlands 014, 035, 039, 045, 049, 056, 086, 094 and 126C show proposed mats in the plan view but not in the profile view. Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]
6. On the Ch. 105 Modernization Plan, Streams 012 and 057 show temporary bridge crossings in the plan view but not in the profile view. Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]

7. On Ch. 105 Modernization Plan sheet WSS-MCK-ML-021, please add a label in the profile indicating the depth of cover over stream 030. [25 Pa. Code §105.21(a)(1)]
8. On the Ch. 105 Modernization Plan, please show both HDD Entry/Exit locations for the Potato Creek crossing. There is an HDD Entry/Exit location shown near Station 356+00 on sheet WSS-MCK-ML-023, the second HDD Entry/Exit location is not shown. [25 Pa. Code §105.21(a)(1)]
9. On the Ch. 105 Modernization Plan, please show both HDD Entry/Exit locations for the Allegheny River crossing. There is an HDD Entry/Exit location shown near Station 781+00 on sheet WSS-MCK-ML-046, the second HDD Entry/Exit location is not shown. [25 Pa. Code §105.21(a)(1)]
10. Wetland 080 is shown as PEM on Ch. 105 Modernization Plan sheet WSS-MCK-ML-041A but is shown as PUB on the Aquatic Resource Impact Table (ARIT). Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]
11. Stream 146 is shown as PEM on Ch. 105 Abandonment Plan sheet WSS-CLE-AB-004 but is not shown on the ARIT. Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]
12. Streams 090, 091 and 092 are shown on Ch. 105 Modernization Plan sheets WSS-MCK-ML-052A and WSS-MCK-ML-052B but are not included on the ARIT. Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]
13. Please ensure adequate trench plugs are installed along the proposed alignment through Wetlands 005, 007, 009, 010, 020/020A, 023, 051, 061, 066A, 091/091A to avoid impacts to wetland hydrology. The E&S Notes indicate that trench plugs will be installed every 100 feet where applicable, however this practice is not shown/depicted on the drawings. Please submit revised drawings as applicable. [25 Pa. Code §§105.18a(a)(1) and 105.18a(b)(1)]
14. It appears that temporary direct impacts to EV Wetland 004B could have been further minimized by installing the temporary wetland mats on the northwest side of the ROW, which would be at the narrowest point of the wetland within the ROW. Please evaluate the possibility of moving the temporary wetland mats to the northwest side of the ROW at this location. If this is not possible to achieve, please provide justification why. [25 Pa. Code §105.18a(a)(3)]
15. It appears that temporary direct impacts to Other PFO Wetland 127 and EV PFO Wetlands 007A, 007B, 009A, 009B, 010A, 010B, and 031 could have been minimized or avoided by installing the temporary wetland mats on the southeast side of the ROW, where it is currently maintained as a PEM wetland, and clearing of the PFO wetlands could be reduced. Please evaluate the possibility of moving the temporary wetland mats to the southeast side of the ROW at these locations and

limiting additional clearing of these PFO wetlands. If this is not possible to achieve, please provide justification why. [25 Pa. Code §105.18a(a)(3) and 105.18a(b)(3)]

16. It appears that temporary direct impacts to EV PSS Wetland 026 associated with the temporary wetland mats could have been avoided by installing the mats on the southeast side of the ROW where it is currently maintained as a PEM wetland. This would result in reduced clearing of the EV PSS wetland and crossing at a narrower point of Wetland 026A. Please evaluate the possibility of moving the temporary wetland mats to the southeast side of the ROW at this location and limiting additional clearing of Wetland 026. If this is not possible to achieve, please provide justification why. [25 Pa. Code §105.18a(a)(3)]
17. It appears that temporary direct impacts to EV PEM Wetland 055 could have been minimized and impacts to EV PEM Wetland 056 could have been avoided by installing the temporary wetland mats on the south side of the ROW. This would result in crossing Wetland 055 and Stream 043 at the narrowest point, while also avoiding any impacts to EV PEM Wetland 056. Please evaluate the possibility of moving the temporary wetland mats to the south side of the ROW at this location. If this is not possible to achieve, please provide justification why. [25 Pa. Code §105.18a(a)(3)]
18. It appears that temporary direct impacts to EV PSS Wetland 091 associated with the temporary wetland mats could have been avoided by installing the mats on the north-northeast side of the ROW where it is currently maintained as a PEM wetland. This would result in reduced clearing of the EV PSS wetland and crossing at the narrowest point of the wetland complex within the ROW, through EV PEM Wetland 091A. In addition, this would result in crossing at the narrowest point of Stream 077. Please evaluate the possibility of moving the temporary wetland mats to the north-northeast side of the ROW at this location and limiting additional clearing of Wetland 091. If this is not possible to achieve, please provide justification why. [25 Pa. Code §105.18a(a)(3)]
19. Please ensure that the stream name and Chapter 93 classification are provided for all watercourses, including those described as “Ditches” in the application, that contribute perennial or intermittent surface water flow to a downstream jurisdictional water (e.g. Ditches 05-06, 09-10, 12, 17-18, 58-59). Please also ensure that the Riverine Condition Level 2 Rapid Assessment forms and mapping are provided for these watercourses. [25 Pa. Code §§105.13(e)(1)(i)(A), 105.15(c) and 105.21(a)(1)]
20. It appears that impacts to Other PEM Wetland 094 could have been avoided by crossing Ditch 17 on the north side of the ROW. Please evaluate the possibility of crossing Ditch 17 on the north side of the ROW. If this is not possible to achieve, please provide justification why. [25 Pa. Code §105.18a(b)(3)]

21. Regarding the Coleman Creek-1 crossing, it appears that temporary impacts could have been minimized by crossing the stream on the north side of the ROW at the narrowest point of the stream and only requiring one temporary crossing instead of two. Please evaluate the possibility of crossing Coleman Creek-1 on the north side of the ROW at this location. If this is not possible to achieve, please provide justification why. [25 Pa. Code §105.14(b)]
22. There are several wetlands and streams in the vicinity of access roads that are noted in the impact tables as having temporary impacts, however, the drawings note “Existing road, no improvements proposed”. If there is an existing access road and no improvements are proposed, why are these resources being impacted? If there will be no impacts to these resources, the limits of disturbance must be restricted to the extents of the existing access road, BMPs installed along the access road to protect nearby wetlands and streams, and the impact information clarified throughout the application. Furthermore, if the existing access road is not well developed, and some disturbance/improvement is required to make the access road passable, these circumstances should be described and appropriate BMPs must be implemented. [25 Pa. Code §§105.14(b), 105.18a(a)(1) and 105.18a(b)(1)]
23. The Site-Specific Drawings (Appendix P) show impacts to Ditches 01, 06, 18-2, 18-3, 58, 59. First, the table shown on the drawing notes “Existing road, no improvements proposed” – see remarks regarding this note in comment #20 above. Second, if impacts are proposed to the ditches after considering the remarks in comment #20 above, such impacts should be incorporated into the other associated impact tables throughout the application (e.g. ARIT, Table 3.5-1 [Appendix O], and Table 2.3-1 [Appendix G]). [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
24. The Site-Specific Drawings (Appendix P) show impacts to several other watercourses (described as ditches) along the pipeline alignment. The tables shown on the drawings detail the impacts proposed, however these impacts are not incorporated into the ARIT, Table 3.5-1 (Appendix O), nor Table 2.3-1 (Appendix G). Please submit revised tables and other associated application documents reflecting the impacts to these watercourses. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
25. Regarding the temporary impacts to Stream 195 and the adjacent area where erosion control blanket is proposed, upon review of satellite imagery and the Erosion and Sediment Control Plan Drawings, it appears that there is an existing bridge that crosses the stream and most areas where erosion control blanket is proposed appear to already be paved/disturbed/compacted for access. Please clarify 1) if the project will be utilizing the existing bridge or installing a new/different bridge, and 2) what the current and proposed ground cover is/will be for the erosion control blanket area depicted on the Site-Specific Drawings (Appendix P) and the Erosion and Sediment Control Plans at this location. [25 Pa. Code §§105.14(b) and 105.21(a)(1)]

26. Please provide a mitigation plan that is in accordance with [25 Pa. Code §105.13(e)(1)(ix)] and E.A. Form Instructions, Module S4. (DEP Doc. No. 3150-PM-BWEW0017, Rev. 6/2017)
27. The permanent impacts to Wetlands 020A, 026, and 091 were not incorporated into the impact acreage to be mitigated. Please ensure that these impacts are incorporated into the mitigation plan at the appropriate ratios; review and provide revised application documents as applicable. [25 Pa. Code §§105.20a(a) and 105.21(a)]
28. The Wetland Determination Data Form for Sampling Point WD073JLM is missing the vegetation and soils pages. Please provide the missing pages of this data form. [25 Pa. Code §§§105.13(e)(1)(x)(A), 105.21(a)(1) and 105.451]
29. Wetland Determination Data Form for Sampling Point WD082TMM has an inconsistency regarding the presence of hydric soils. Based on the information provided for the soil profile, the soil does not meet the criteria for a Depleted Matrix (F3). The first page of the data form indicates that hydric soils are not present, however, on the soils page the Depleted Matrix (F3) indicator is checked and “Yes” is checked for the presence of hydric soils. Please revise and resubmit this data form. [25 Pa. Code §§§105.13(e)(1)(x)(A), 105.21(a)(1) and 105.451]
30. Wetland Determination Data Form for Sampling Point WD083TMM indicates the presence of a wetland, however, no boundaries have been delineated on the drawings. In addition, based on the information provided, the soil does not meet the criteria for a Depleted Dark Surface (F7). Please provide the delineated wetland boundary for this location and submit a revised data form reflecting the correct soil indicator(s) present. [25 Pa. Code §§§§105.13(e)(1)(i)(A), 105.13(e)(1)(x)(A), 105.21(a)(1) and 105.451]
31. The Wetland Condition Level 2 Rapid Assessment for W008 indicates that no invasive species were present in the AA. However, based on the information provided in the Wetland Investigation Report, an invasive species (*Phalaris arundinacea*) was identified at the sampling location for that wetland (WD085JLM). Please review and revise the Rapid Assessment as necessary to reflect the conditions observed within the AA. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
32. The Longitude provided on the Wetland Condition Level 2 Rapid Assessment for W009, 009A, 009B, and Pond 03 appears to be incorrect. Please review and revise as necessary. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
33. The coordinates provided on the Wetland Condition Level 2 Rapid Assessment for W051 appear to be incorrect, they are the same as W049. Please review and revise as necessary. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]

34. Assessment Area mapping was provided for wetlands W002, 003, 004a, 017, 017a, 159, and 160, however it is not clear where these wetlands are represented in the Wetland Condition Level 2 Rapid Assessment forms. Please either describe where these wetlands are represented in the assessment forms previously submitted or submit the missing assessment forms. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
35. It appears that Wetland Condition Level 2 Rapid Assessment forms and mapping are missing, or it is not clear where the following impacted wetlands (located along access roads) listed in Table 3.5-1 (Appendix O) are represented: Wetlands 035a, 057, 058, 058a, 060, 060a, 061b, 061c, 062, 062a, 063, 063a, 064, 065, 065a, 089, 089a, 117, 118, 119, 119a, 120, 121, 121a, 122, 123, 123a, 126, 140. Please either describe where these wetlands are represented in the assessment forms and mapping previously submitted or submit the missing assessment forms and mapping. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
36. Upon review of aerial imagery, NWI mapping, LiDAR contours, and modeled wetland mapping, six (6) areas of concern (AOC) with respect to potential wetlands were identified where no data forms or photographs were provided in the Wetland Investigation Report. The approximate central coordinates along the modernization line for each of these areas are as follows: AOC 01 (41.723042, -78.459772), AOC 02 (41.742817, -78.431558), AOC 03 (along access road corridor; 41.74585, -78.323492), AOC 04 (along access road corridor; 41.777092, -78.309633), AOC 05 (along access road corridor; 41.782831, -78.306722), AOC 06 (along access road corridor; 41.775828, -78.291967). Please review these areas to determine the presence/absence of wetlands. Provide Wetland Determination Data Forms, photographs, and revised application documents as applicable (mapping, impact tables, etc.) [25 Pa. Code §§§105.13(e)(1)(i)(A), 105.13(e)(1)(x), 105.21(a)(1) and 105.451]
37. Please submit the copy and proof of receipt of Acts 14/67/68/127 notification letter for Keating Township. [25 Pa. Code §105.21(a)(1)]

## Potter

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1. Regarding the abandonment portion of the project in Potter County, it appears that only the Regulated Waters of this Commonwealth (including wetlands) where earth disturbance is proposed to occur are included in the project impacts. Please ensure that all resources and associated impacts are accounted for, regardless of whether earth disturbance is proposed in those areas. For example, the permanent indirect impact for Wetland 131 should be the pipe diameter × pipe length that is abandoned in the wetland; however, Wetland 131 is not listed in Table 3.5-1 (Appendix O), site-specific drawings (Appendix P), nor the ARIT. Please revise and resubmit associated tables/information as necessary. [25 Pa. Code §§§105.13(e)(1)(x), 105.15(c) and 105.21(a)(1)]

2. Please provide a description and associated details of onsite avoidance and minimization efforts that were implemented for the preferred (selected) alternative with respect to the modernization portion of the project. [25 Pa. Code §§105.14(b)(7) and 105.15(c)] and E.A. Form Instructions, Module S3.F.2-3 (DEP Doc. No. 3150-PM-BWEW0017, Rev. 6/2017)
3. On page 39 of the E.A. Narrative under section 2.4.1 (page 49 of the PDF), the second paragraph from the top states “There are no wetlands intersecting proposed aboveground facilities; therefore, no wetland types will be permanently impacted by the Project.” Although there are no aboveground facilities that will permanently impact wetlands, the application documents detail proposed permanent conversion of PFO and PSS wetlands to maintain the pipeline, therefore having permanent wetland impacts. Please revise this section of the Narrative and any applicable associated attachments as necessary. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
4. There are several wetlands and streams in the vicinity of access roads that are noted in the impact tables as having temporary impacts, however, the drawings note “Existing road, no improvements proposed”. If there is an existing access road and no improvements are proposed, why are these resources being impacted? If there will be no impacts to these resources, the limits of disturbance must be restricted to the extents of the existing access road, BMPs installed along the access road to protect nearby wetlands and streams, and the impact information clarified throughout the application. Furthermore, if the existing access road is not well developed, and some disturbance/improvement is required to make the access road passable, these circumstances should be described and appropriate BMPs must be implemented. §105.13(e)(1)(x), 105.14(b), 105.15(c), 105.18a(a)(1), 105.18a(b)(1)
5. On the Ch. 105 Modernization Plan, wetlands 125, 141 and 141A show proposed mats in the plan view but not in the profile view. Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]
6. On the Ch. 105 Modernization Plan, stream 151 shows a temporary bridge crossing in the plan view but not in the profile view. Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]
7. There appear to be stream crossings that are not addressed in the application. For example, on Sheet 13 of 86 of the Abandonment E&S Plan there appears to be a stream crossing to the east of milepost 38.5. Please review all plans and address all stream crossings. [25 Pa. Code §105.21(a)(1)]
8. Stream 090, Stream 091, Stream 092 and Wetland 096 are included in the ARIT but cannot be located on the Ch 105. Modernization Plan. Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]

9. Please ensure that the stream name and Chapter 93 classification are provided for all watercourses, including those described as “Ditches” in the application, that contribute perennial or intermittent surface water flow to a downstream jurisdictional water (e.g. Ditch 20). Please also ensure that the Riverine Condition Level 2 Rapid Assessment forms and mapping are provided for these watercourses. [25 Pa. Code §§§105.13(e)(1)(i)(A), 105.15(c) and 105.21(a)(1)]
10. The access road wetland and stream crossing plans (Site-Specific Drawings, Appendix P) show impacts to several watercourses (described as ditches). First, the table shown on the drawing notes “Existing road, no improvements proposed” – see remarks regarding this note in comment #4 above. Second, if impacts are proposed to these watercourses after considering the remarks in comment #4 above, such impacts should be incorporated into the other associated impact tables throughout the application. [25 Pa. Code §§§§105.13(e)(1)(x), 105.14(b), 105.15(c) and 105.21(a)(1)]
11. Please provide a mitigation plan that is in accordance with [25 Pa. Code §105.13(e)(1)(ix)] and E.A. Form Instructions, Module S4 (DEP Doc. No. 3150-PM-BWEW0017, Rev. 6/2017)
12. On page 27 of 66 of Figure 4.1-1 (Wetlands & Waterbody Delineation mapping), there is a RW200TMM (representative wetland) photo location, however, no wetland boundary is shown on the drawings. Please provide the delineated wetland boundary for this location and any associated data forms that were completed for that location. [25 Pa. Code §§§§105.13(e)(1)(i)(A), 105.13(e)(1)(x), 105.21(a)(1) and 105.451]
13. Regarding the abandonment portion of the project in Potter County, it appears that wetland and stream delineation maps were only provided where earth disturbance is proposed to occur (Figure 4.1-1 of Wetland Investigation Report). Please provide all wetland and stream delineation maps for the abandonment line, regardless of whether earth disturbance is proposed in those areas. [25 Pa. Code §§§105.13(e)(1)(i)(A) and 105.21(a)(1)]
14. There are two Wetland Determination Data Forms for sampling point WD207TMM that contain different information. Please clarify which data form correctly represents WD207TMM and if one of the data forms was meant for a different sampling location. In addition, regarding both of the WD207TMM data forms, based on the information provided, the soils do not meet the criteria for a Depleted Matrix (F3) or Depleted Dark Surface (F7). Please submit revised data forms reflecting the correct sampling point and soil indicator(s) present. [25 Pa. Code §§§105.13(e)(1)(x), 105.21(a)(1) and 105.451]
15. It appears that temporary direct impacts to EV PSS Wetland 141 associated with the temporary wetland mats could have been avoided by travelling on the north side of the ROW outside of the wetland. Please evaluate the possibility of travelling on

the north side of the ROW at this location and avoiding additional disturbance to Wetland 141. If this is not possible to achieve, please provide justification why. [25 Pa. Code §105.18a(a)(3)]

16. It appears that temporary direct impacts to EV PEM Wetland 125 could have been minimized by installing the temporary wetland mats on the south side of the ROW. This would result in crossing Wetland 125 at the narrowest point. Please evaluate the possibility of moving the temporary wetland mats to the south side of the ROW at this location. If this is not possible to achieve, please provide justification why. [25 Pa. Code §105.18a(a)(3)]
17. The Riverine Rapid Assessment form appears to be missing for Stream 092. Please submit the assessment form or indicate where Stream 092 is represented in the Riverine Rapid Assessment forms previously submitted. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
18. It appears that a Wetland Condition Level 2 Rapid Assessment form and map are missing, or it is not clear where Wetland 106 is represented. Please either describe where this wetland is represented in the assessment forms and mapping previously submitted or submit the missing assessment form and map. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
19. Near MP 26.6, within Wetland 125, eMapPA, StreamStats, and the PA FBC Stream Mapping indicate that there is an UNT East Branch Fishing Creek (HQ-CWF) located within Wetland 125, however, no stream channel was delineated in the survey area. Please review the project area at this location and provide the delineated stream channel as applicable. Provide revised impact information as necessary. [25 Pa. Code §§§105.13(e)(1)(i)(A), 105.13(e)(1)(x) and 105.21(a)(1)]
20. Upon review of aerial imagery, NWI mapping, LiDAR contours, and modeled wetland mapping, three (3) areas of concern (AOC) with respect to potential wetlands were identified where no data forms or photographs were provided in the Wetland Investigation Report. The approximate central coordinates along the abandonment/modernization line for each of these areas are as follows: AOC 07 (entire access road corridor; 41.835519, -78.160281), AOC 08 (41.569992, -78.072894), AOC 09 (41.560889, -78.079458). Please review these areas to determine the presence/absence of wetlands. Provide Wetland Determination Data Forms, photographs, and revised application documents as applicable (mapping, impact tables, etc.) [25 Pa. Code §§§105.13(e)(1)(i)(A), 105.13(e)(1)(x), 105.21(a)(1) and 105.451]
21. Please submit the copy and proof of receipt of Acts 14/67/68/127 notification letter for Sylvania Township. [25 Pa. Code §105.21(a)(1)]

1. It appears that only the Regulated Waters of this Commonwealth (including wetlands) where earth disturbance is proposed to occur are included in the project impacts. Please ensure that all resources and associated impacts are accounted for, regardless of whether earth disturbance is proposed in those areas. For example, the permanent indirect impact for Wetland 147a should be the pipe diameter  $\times$  pipe length that is abandoned in the wetland; however, Wetland 147a is not listed in Table 3.5-1 (Appendix O), site-specific drawings (Appendix P), nor the ARIT. Please revise and resubmit associated tables/information as necessary. [25 Pa. Code §§§105.13(e)(1)(x), 105.15(c) and 105.21(a)(1)]
2. Not all permanent indirect impacts (abandonment of the pipe in place) were accounted for with respect to the Regulated Waters of this Commonwealth (including wetlands) that were evaluated for impacts. For example, the permanent indirect impact for Wetland 148 should be the pipe diameter  $\times$  pipe length that is abandoned in the wetland; Table 3.5-1 (Appendix O), site-specific drawings (Appendix P), and the ARIT only accounted for the temporary direct impact of the wetland mat. Please revise and resubmit associated tables/information as necessary. [25 Pa. Code §§§105.13(e)(1)(x), 105.15(c) and 105.21(a)(1)]
3. Regarding the proposed impacts to Wetland 148, please evaluate the possibility of shifting the proposed cut and cap location and associated disturbance further southwest along the alignment to avoid disturbing the wetland. [25 Pa. Code §105.18a(a)(3)]
4. It appears that wetland and stream delineation maps were only provided where earth disturbance is proposed to occur (Figure 4.1-1 of Wetland Investigation Report). Please provide all wetland and stream delineation maps for the abandonment line, regardless of whether earth disturbance is proposed in those areas. [25 Pa. Code §§§105.13(e)(1)(i)(A) and 105.21(a)(1)]
5. Please provide a mitigation plan that is in accordance with [25 Pa. Code §105.13(e)(1)(ix)] and E.A. Form Instructions, Module S4 (DEP Doc. No. 3150-PM-BWEW0017, Rev. 6/2017).
6. The SR 120 North Access Road appears to cross Johnson Run at 41.358469, -78.129017, however, no stream channel was delineated at this location. Please review the project area at this location. Provide the delineated stream channel and associated revised application documents as applicable (tables, assessments, mapping, drawings, etc.). [25 Pa. Code §§§§105.13(e)(1)(i)(A), 105.13(e)(1)(x), 105.15(c) and 105.21(a)(1)]
7. Regarding the siting of the SR 120 North Access Road, there appears to be an existing access road on the northwest side of Johnson Run. Utilizing this existing access road would reduce the impacts to Elk State Forest and the floodway of Johnson Run. Please evaluate the possibility of utilizing the existing access road

located on the northwest side of Johnson Run. If this is not possible to achieve, please provide justification why. [25 Pa. Code §105.14(b)]

8. The limits of disturbance and pipeline to be abandoned appears to cross an UNT Driftwood Branch Sinnemahoning Creek (HQ-CWF, MF) at MP 26.2 (41.3496, -78.1353); however, no stream channel was delineated at this location. Please review the project area at this location. Provide the delineated stream channel and associated revised application documents as applicable (tables, assessments, mapping, drawings, etc.). [25 Pa. Code §§§§105.13(e)(1)(i)(A), 105.13(e)(1)(x), 105.15(c) and 105.21(a)(1)]
9. Upon review of aerial imagery, NWI mapping, LiDAR contours, and modeled wetland mapping, six (6) areas of concern (AOC) with respect to potential wetlands were identified where no data forms or photographs were provided in the Wetland Investigation Report. The approximate central coordinates along the abandonment line for each of these areas are as follows: AOC 10 (41.407086, -78.114003), AOC 11 (41.380836, -78.112781), AOC 12 (along an access road; 41.360103, -78.126967), AOC 13 (along an access road; 41.346656, -78.137972), AOC 14 (41.3321, -78.186611), AOC 15 (along an access road; 41.331814, -78.198517). Please review these areas to determine the presence/absence of wetlands. Provide Wetland Determination Data Forms, photographs, and revised application documents as applicable (mapping, impact tables, etc.) [25 Pa. Code §§§§105.13(e)(1)(i)(A), 105.13(e)(1)(x), 105.21(a)(1) and 105.451]
10. There appear to be stream crossings that are not addressed in the application. For example, on Sheet 8 of 86 of the Abandonment E&S Plan there appears to be a stream crossing in between the areas shown on Sheet 24 of 86 and Sheet 25 of 86. Please review all plans and address all stream crossings. [25 Pa. Code §105.21(a)(1)]
11. The Ch. 105 Abandonment Plan shows pipeline crossings under Stream 177 and Wetland 147 that are not shown on the ARIT. Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]
12. Please indicate how the work area next to Wetland 148, shown on Ch. 105 Abandonment Plan sheet WSS-CAM-AB-001 will be accessed. [25 Pa. Code §105.21(a)(1)]
13. Please indicate how the work area shown on Ch. 105 Abandonment Plan sheet WSS-CAM-AB-002 will be accessed. There is an access road is identified as RR South Access, but it is unclear how vehicles will get to the access road. Also, if there are railroad tracks present, please show and label them on the plan sheet. [25 Pa. Code §105.21(a)(1)]
14. Table 1.6 in the E.A. shows a crossing at Mix Run near milepost 22.1, however on Abandonment E&S Plan sheet 39 of 86 only one cut and cap location is shown.

Please clarify if this is correct. If there should be a second cut and cap location, please show it on the plans. Also, please label Mix Run on the plan sheet. [25 Pa. Code §105.21(a)(1)]

## Elk

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1. It appears that only the Regulated Waters of this Commonwealth (including wetlands) where earth disturbance is proposed to occur are included in the project impacts. Please ensure that all resources and associated impacts are accounted for, regardless of whether earth disturbance is proposed in those areas. For example, the permanent indirect impact for Wetland 134 should be the pipe diameter × pipe length that is abandoned in the wetland; however, Wetland 134 is not listed in Table 3.5-1 (Appendix O), site-specific drawings (Appendix P), nor the ARIT. Please revise and resubmit associated tables/information as necessary. [25 Pa. Code §§§105.13(e)(1)(x), 105.15(c) and 105.21(a)(1)]
2. Not all permanent indirect impacts (abandonment of the pipe in place) were accounted for with respect to the Regulated Waters of this Commonwealth (including wetlands) that were evaluated for impacts. For example, the permanent indirect impact for Wetland 134a should be the pipe diameter × pipe length that is abandoned in the wetland; Table 3.5-1 (Appendix O), site-specific drawings (Appendix P), and the ARIT only accounted for the temporary direct impact of the wetland mat. Please revise and resubmit associated tables/information as necessary. [25 Pa. Code §§§105.13(e)(1)(x), 105.15(c) and 105.21(a)(1)]
3. It appears that wetland and stream delineation maps were only provided where earth disturbance is proposed to occur (Figure 4.1-1 of Wetland Investigation Report). Please provide all wetland and stream delineation maps for the abandonment line, regardless of whether earth disturbance is proposed in those areas. [25 Pa. Code §§§105.13(e)(1)(i)(A) and 105.21(a)(1)]
4. Regarding the abandonment activities and associated limits of disturbance at Station 423+56 (near Stream 143), please provide information on the proposed method of temporary access to this location. Be sure to include impacts to Regulated Waters of this Commonwealth (including wetlands) and describe all applicable Erosion and Sediment Control BMPs that will be implemented. Submit revised application documents as necessary (tables, drawings, etc.) [25 Pa. Code §§§§105.13(e)(1)(x), 105.14(b), 105.15(c) and 105.21(a)(1)]
5. Upon review of aerial imagery, NWI mapping, LiDAR contours, and modeled wetland mapping, four (4) areas of concern (AOC) with respect to potential wetlands were identified where no data forms or photographs were provided in the Wetland Investigation Report. The approximate central coordinates along the abandonment line for each of these areas are as follows: AOC 16 (41.322569, -78.253883), AOC 17 (along an access road; 41.302436, -78.317017), AOC 18

(along an access road; 41.255775, -78.356806), AOC 19 (41.255825, -78.359406). Please review these areas to determine the presence/absence of wetlands. Provide Wetland Determination Data Forms, photographs, and revised application documents as applicable (mapping, impact tables, etc.) [25 Pa. Code §§§105.13(e)(1)(i)(A), 105.13(e)(1)(x), 105.21(a)(1) and 105.451]

6. Please ensure that the stream name and Chapter 93 classification are provided for all watercourses, including those described as “Ditches” in the application, that contribute perennial or intermittent surface water flow to a downstream jurisdictional water (e.g. Ditch 60). Please also ensure that the Riverine Condition Level 2 Rapid Assessment forms and mapping are provided for these watercourses. [25 Pa. Code §§§105.13(e)(1)(i)(A), 105.15(c), 105.21(a)(1)]
7. There appear to be stream crossings that are not addressed in the application. For example, on Sheet 5 of 86 of the Abandonment E&S Plan there appears to be a stream crossing to the west of milepost 12.5. Please review all plans and address all stream crossings. [25 Pa. Code §105.21(a)(1)]
8. The Ch. 105 Abandonment Plan sheet WSS-ELK-AB-003 shows a pipeline crossing under Wetland 134 that is not shown on the ARIT. Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]
9. Please show and label Medix Run Rd on Ch. 105 Abandonment Plan WSS-ELK-AB-001. [25 Pa. Code §105.21(a)(1)]
10. Please show and label Curtis Wright Rd (SR 2004) on Ch. 105 Abandonment Plan WSS-ELK-AB-002. [25 Pa. Code §105.21(a)(1)]
11. On Ch. 105 Abandonment Plan sheet WSS-ELK-AB-003 and the Abandonment E&S plan sheet 28 of 86, please show and label the feature that separates Wetland 134A from Wetland 134. [25 Pa. Code §105.21(a)(1)]
12. Table 1.6 in the E.A. shows a crossing at Grant Trail Road near milepost 12.0, however on Abandonment E&S Plan sheet 28 of 86 only one cut and cap location is shown. Please clarify if this is correct. If there should be a second cut and cap location, please show it on the plans. Also, please label Grant Trail Road on the plan sheet. [25 Pa. Code §105.21(a)(1)]
13. Table 1.6 in the E.A. shows a crossing at Grant Trail Road near milepost 12.8, however on Abandonment E&S Plan sheet 29 of 86 only one cut and cap location is shown. Please clarify if this is correct. If there should be a second cut and cap location, please show it on the plans. Also, please label Grant Trail Road on the plan sheet. [25 Pa. Code §105.21(a)(1)]

1. It appears that only the Regulated Waters of this Commonwealth (including wetlands) where earth disturbance is proposed to occur are included in the project impacts. Please ensure that all resources and associated impacts are accounted for, regardless of whether earth disturbance is proposed in those areas. For example, the permanent indirect impact for Wetland 139b should be the pipe diameter  $\times$  pipe length that is abandoned in the wetland; however, Wetland 139b is not listed in Table 3.5-1 (Appendix O), site-specific drawings (Appendix P), nor the ARIT. Please revise and resubmit associated tables/information as necessary. [25 Pa. Code §§105.13(e)(1)(x), 105.15(c) and 105.21(a)(1)]
2. Not all permanent indirect impacts (abandonment of the pipe in place) were accounted for with respect to the Regulated Waters of this Commonwealth (including wetlands) that were evaluated for impacts. For example, the permanent indirect impact for Wetland 149 should be the pipe diameter  $\times$  pipe length that is abandoned in the wetland; Table 3.5-1 (Appendix O), site-specific drawings (Appendix P), and the ARIT only accounted for the temporary direct impact of the wetland mat. Please revise and resubmit associated tables/information as necessary. [25 Pa. Code §§105.13(e)(1)(x), 105.15(c) and 105.21(a)(1)]
3. Wetland 149B, located in the vicinity of an access road, is noted in the impact table as having temporary impacts, however, the drawings note “Existing road, no improvements proposed”. If there is an existing access road and no improvements are proposed, why is Wetland 149B being impacted? If there will be no impacts, the limits of disturbance must be restricted to the extents of the existing access road, BMPs installed along the access road to protect Wetland 149B, and the impact information clarified throughout the application. Furthermore, if the existing access road is not well developed, and some disturbance/improvement is required to make the access road passable, these circumstances should be described and appropriate BMPs must be implemented. [25 Pa. Code §105.18a(a)(1)]
4. It appears that wetland and stream delineation maps were only provided where earth disturbance is proposed to occur (Figure 4.1-1 of Wetland Investigation Report). Please provide all wetland and stream delineation maps for the abandonment line, regardless of whether earth disturbance is proposed in those areas. [25 Pa. Code §§105.13(e)(1)(i)(A) and 105.21(a)(1)]
5. It appears that the mapping associated with Riverine Rapid Assessment form for Stream 145 does not reflect the correct stream being described based on the coordinates given. Please submit the assessment mapping associated with Stream 145. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]
6. Assessment Area mapping was provided for Wetland 149b, however it is not clear where this wetland is represented in the Wetland Condition Level 2 Rapid Assessment forms. Please either describe where this wetland is represented in the

assessment forms previously submitted or submit the missing assessment form. [25 Pa. Code §§105.15(c) and 105.21(a)(1)]

7. Please provide a mitigation plan that is in accordance with [25 Pa. Code §105.13(e)(1)(ix)] and E.A. Form Instructions, Module S4 (DEP Doc. No. 3150-PM-BWEW0017, Rev. 6/2017).
8. Regarding the abandonment activities and associated limits of disturbance at Station 255+20 (41.232942, -78.475528; near Stream 145), please provide information on the proposed method of temporary access to this location. Be sure to include impacts to Regulated Waters of this Commonwealth (including wetlands) and describe all applicable Erosion and Sediment Control BMPs that will be implemented. Submit revised application documents as necessary (tables, drawings, etc.) [25 Pa. Code §§§§105.13(e)(1)(x), 105.14(b), 105.15(c) and 105.21(a)(1)]
9. Upon review of aerial imagery, NWI mapping, LiDAR contours, and modeled wetland mapping, two (2) areas of concern (AOC) with respect to potential wetlands were identified where no data forms or photographs were provided in the Wetland Investigation Report. The approximate central coordinates along the abandonment line for each of these areas are as follows: AOC 20 (41.240067, -78.432572), AOC 21 (41.231414, -78.464011). Please review these areas to determine the presence/absence of wetlands. Provide Wetland Determination Data Forms, photographs, and revised application documents as applicable (mapping, impact tables, etc.) [25 Pa. Code §§§§105.13(e)(1)(i)(A), 105.13(e)(1)(x), 105.21(a)(1) and 105.451]
10. Please ensure that the stream name and Chapter 93 classification are provided for all watercourses, including those described as “Ditches” in the application, that contribute perennial or intermittent surface water flow to a downstream jurisdictional water (e.g. Ditch 47). Please also ensure that the Riverine Condition Level 2 Rapid Assessment forms and mapping are provided for these watercourses. [25 Pa. Code §§§105.13(e)(1)(i)(A), 105.15(c) and 105.21(a)(1)]
11. There appear to be stream crossings that are not addressed in the application. For example, on Sheet 1 of 86 of the Abandonment E&S Plan there appear to be stream crossings to the east and west of milepost 1.5. Please review all plans and address all stream crossings. [25 Pa. Code §105.21(a)(1)]
12. The Ch. 105 Abandonment plan, sheet WSS-CLE-AB-002, shows pipeline crossings under Stream 146 and Stream 147 that are not shown on the ARIT. Please review all plans and revise accordingly. [25 Pa. Code §105.21(a)(1)]
13. On Ch. 105 Abandonment Plan sheet WSS-CLE-AB-002, please clarify how the RR Access Rd. crosses Stream 180. If there is an existing bridge over Stream 180, please show and label the bridge on the plan sheet. [25 Pa. Code §105.21(a)(1)]

14. Please show and label the railroad tracks on Ch. 105 Abandonment Plan sheet WSS-CLE-AB-003. [25 Pa. Code §105.21(a)(1)]
15. Please indicate how the work area on the easterly side of the railroad tracks, shown on Ch. 105 Abandonment Plan sheet WSS-CLE-AB-003, will be accessed. [25 Pa. Code §105.21(a)(1)]
16. Please show and label Saunders Rd on Ch. 105 Abandonment Plan sheet WSS-CLE-AB-004. [25 Pa. Code §105.21(a)(1)]
17. Please indicate how the work area on the westerly side of Stream 145, shown on Ch. 105 Abandonment Plan sheet WSS-CLE-AB-004, will be accessed. [25 Pa. Code §105.21(a)(1)]
18. Table 1.6-1 in the E.A. shows a railroad crossing at milepost 0.1, however on Ch. 105 Abandonment Plan sheet WSS-CLE-AB-003 the railroad crossing appears to be closer to milepost 0.3. Please review and revise accordingly. [25 Pa. Code §105.21(a)(1)]
19. Table 1.6 in the E.A. shows a crossing at Tyler Road near milepost 1.8, however on Abandonment E&S Plan sheet 20 of 86 only one cut and cap location is shown. Please clarify if this is correct. If there should be a second cut and cap location, please show it on the plans. [25 Pa. Code §105.21(a)(1)]
20. Access to the “grout insertion location” and “end grout location” sites shown on alignment sheets 18/86 near the railroad will be problematic because of the ongoing mining operation straddling the pipeline ROW and proposed access roads. Additional timber mats may provide access to the site, otherwise the current plan of access may need to be revised. Please clarify. [25. Pa. Code §105.13(g)]
21. Concerning the same grout insertion location just west of the railroad, two 18” compost filter socks are shown upslope. Please clarify if these are meant to be placed on the downslope, or if they are meant to act as berms to divert water away from the area of construction. [25. Pa. Code §105.13(g)]
22. Please note – there is an active surface mine near abandonment milepost 0.3, permitted as an Industrial Mineral Mining Operation with an NPDES discharge. If not done already, there should be communication to ensure no overlapping permit, or other, implications. [25. Pa. Code §105.13(g)]

Pursuant to 25 Pa. Code §105.13a of DEP’s Chapter 105 Rules and Regulations you must submit a response fully addressing each of the significant technical deficiencies set forth above. Please note that this information must be received within sixty (60) calendar days from the date of this letter, on or before **September 8, 2020** or DEP may consider the application to be withdrawn by the applicant.

You may request a time extension, in writing, before **September 8, 2020** to respond to deficiencies beyond the sixty (60) calendar days. Requests for time extensions will be reviewed by DEP and considered. You will be notified in writing of the decision either to grant or deny, including a specific due date to respond if the extension is granted. Time extensions shall be in accordance with 25 Pa. Code §105.13a(b).

If you believe that any of the stated deficiencies is not significant, instead of submitting a response to that deficiency, you have the option of asking DEP to make a decision based on the information with regard to the subject matter of that deficiency that you have already made available. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency. Please keep in mind that if you fail to respond, your application may be withdrawn or denied.

Should you have any questions regarding the identified deficiencies, please contact Dave Bolig at 484.250.5828 or at [dbolig@pa.gov](mailto:dbolig@pa.gov) and refer to the Application Numbers referenced above to discuss your concerns or to schedule a meeting. The meeting must be scheduled within the 60-day period allotted for your reply, unless otherwise extended by DEP. You may also follow your application through the review process via *eFACTS on the Web* at: <http://www.ahs2.dep.state.pa.us/eFactsWeb/default.aspx>.

Sincerely,



Kevin S. White, P.E.  
Environmental Group Manager  
Regional Permit Coordination Office

cc: Mott MacDonald, LLC  
U.S. Army Corps of Engineers, Baltimore and Pittsburgh Districts  
PA Fish & Boat Commission, Division of Environmental Services  
Cameron County Conservation District  
Clearfield County Conservation District  
Elk County Conservation District  
McKean County Conservation District  
Potter County Conservation District  
Borough of Driftwood  
Gibson Township  
Lumber Township  
Huston Township  
Lawrence Township  
Benezette Township  
Jay Township  
Keating Township

Liberty Township  
Norwich Township  
Sergeant Township  
Allegheny Township  
Clara Township  
Hebron Township  
Pleasant Valley Township  
Portage Township  
Roulette Township  
Sylvania Township  
Wharton Township