



July 31, 2025

Transcontinental Gas Pipe Line Company, LLC  
c/o Joseph Dean, Permitting Manager  
2800 Post Oak Blvd, Level 11  
Houston, TX 77056

Re: Technical Deficiency Notification  
Water Obstruction & Encroachment Permit  
Northeast Supply Enhancement Project- Quarryville Loop  
DEP Application No. E3683225-006  
APS ID No. 1139499; AUTH ID No. 1530838  
Drumore, East Drumore, and Eden Townships  
Lancaster County

Dear Joseph Dean:

The Department of Environmental Protection (DEP) has reviewed the above referenced application and has identified the following technical deficiencies. 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.

### **Technical Deficiencies**

1. The Impact Plans and Aquatic Resource Impact Table (ARIT) show an impact to stream WW31001; however, the Erosion and Sediment Control Plans do not include this stream crossing. Please revise accordingly. *[25 Pa Code § 105.21(a)(1)]*
2. The Project Description has an older version of the ARIT attached. Please ensure updated files are replace in all locations throughout the application. *[25 Pa Code § 105.21(a)(1)]*
3. The color photo with map in Requirement I does not appear to provide photos for all wetlands. Please provide documentation for all resources, including WB-T02-012. *[25 Pa Code § 105.21(a)(1)]*
4. Please provide the purpose and need for the proposed 25-foot offset between pipeline centerlines in the Project Description. *[25 Pa Code § 105.13(e)(1)(iii)]*
5. The application's Module S1B4-3.8. states, "Based on the results of those surveys and consultation, each agency has responded, indicating clearance of the Project relative to those T&E species within their purview." Final clearances have not been received. Please provide all final clearances from agencies including:

- a. Final clearance from the US Fish and Wildlife Service and include correspondences. *[25 Pa Code §§ 105.14(b) and 105.24]*
  - b. Final clearance from the Pennsylvania Fish and Boat Commission and include correspondences. *[25 Pa. Code §§105.14(b) and 105.24]*
6. The Pennsylvania Fish and Boat Commission has not yet provided comment on the Project; additional comments may be forthcoming. *[25 Pa Code §§ 105.14(b) and 105.24]*
7. Please provide documentation of coordination with Pennsylvania Game Commission regarding construction within Muddy Run State Game Lands (SGL #423). *[25 Pa Code §§ 105.14(b)(5)]*
8. Please provide a summary of current resumes for work completed in 2025 for Module S2A1, per the instructions of the EA (3150-PMBWEW0017). *[25 Pa Code § 105.15(a)(1)]*
9. Table 3-2 Streams Assessed Using the Riverine Protocol states WW-T02-007 had an overall Condition index of 0.29; however, the RCI number provided on page 678 provides an index of 0.43. Moreover WW-T02-001 is shown to have a 0.81 in the table, but 0.73 in the Riverine Assessment Form on page 669 of the PDF. Likewise, wetland W-T06-004 on page 655 has an index of 0.74, but on Table 3-1 of page 1293 there is an index of 0.71, which is what the report from 2016 shows on page 1363 of exhibit 3. Please review and revise final resource tables for consistency with 2025 data. *[25 Pa Code §§ 105.21(a)(1)]*
10. The Modules S3 B8 states Transco will be crossing a property enrolled in the Conservation Resource Enhancement Program (CREP). Please identify this area in the Restoration Plan Drawings. *[25 Pa Code §§ 105.21(a)(1)]*
11. Exhibit and Enclosures 1, Exhibit 13 (page 202 of the PDF) has a redlined sixty-four non-public water supply wells within 150 ft and 7 water supplies within 10 feet of the workspace, while the Modules S1 B3-3.4. states, “Additionally, forty-eight private water supply wells and three private springs with potential to provide water supply or located within or less than 10 ft. from the project area.” There may also be discrepancy on the distance of these wells from the pipeline, as in Module S3, the application states, “six private water supply wells and three private springs are located within or less than 10 feet from Project workspaces. [...] Prior to construction, Transco will seek landowner permission to test all wells within 150 feet of the construction footprint before and after construction.” Please state how many wells are within 150 feet of the construction footprint and subject to water testing. Please ensure the enclosures and modules reflect consistent and up-to-date data on this matter throughout the application. *[25 Pa. Code § 105.21(a)(1)]*
12. Please provide the Subfacility table(s) in the EA Module S3.C. *[25 Pa Code § 105.21(a)(1)]*
13. Please clarify the proposed construction method for Crossing 11, which includes an unnamed tributary to Stewart Run (WW-T06-001) and wetland W-T06-003A-1. The

ARIT states this crossing will be completed using a conventional bore and timber mats, while the Alternatives Analysis narrative and Table 3-1 and 3-2 within Exhibit 22 indicate open cut construction. These documents conflict. Please confirm the correct construction method and revise the application for consistency. If conventional bore is proposed, include a discussion of how bore pit depth concerns will be addressed. [25 Pa Code § 105.21(a)(1)]

14. Photos of Stream WW-T02-008 indicate severe instability of the stream bed and banks. Please evaluate potential secondary impacts that may occur in this area and evaluate the potential need for additional water obstructions and encroachments. [25 Pa Code §§ 105.14(b)(12) & 105.14(b)(4)]
15. Modules S3H references Exhibit 39 for data collected on past, present, and reasonably foreseeable future activities considered in the Cumulative impact discussion. The project data is from 2016 and contains discussion of an HDD. Please provide an updated version of Table IE-1 and discussion, tailored to the current project on past, present, and reasonably foreseeable future activities considered to fulfil Modules S3H. [25 Pa Code § 105.21(a)(1)]
16. Modules S4 should include a discussion on avoiding and minimization of impacts, as indicated in EA instructions S4A (3150-PMBWEW0017). Please also discuss repair and rehabilitation efforts to PSS wetlands and forested riparian floodways in the temporary workspaces. Please also indicate acreage of forested riparian floodways both cleared and replanted. [25 Pa Code §§ 105.13(e)(1)(ix) & 105.21(a)(1)]
17. Exhibits & Enclosure 3, Exhibit 30 V.I.D indicates that a 10' wide corridor will be maintained in an herbaceous state through wetlands. Please provide a table clearly indicating the acreage of permanent conversion of PFO and PSS wetlands and the acreage of temporary conversion of PFO and PSS wetlands. In addition, please provide documentation in Module S4 on how you intend to mitigate for these impacts and update the Restoration Plans accordingly. [25 Pa Code §105.13(e)(1)(ix) & 105.15(a)(1)]
18. Plan sheets were provided for the PFO replanting and vernal pool restoration in Modules S4. Please include plan details provided in the EA Module S4 within the Restoration Plan set and assure both documents correspond. [25 Pa Code §105.13(e)(1)(ix)]
19. Regarding the W—T02-001C-1 PFO Planting Plan, the delineation report indicates the presence of *Quercus palustris* (pin oak) and *Acer negundo* (boxelder). Consider prioritizing the planting of these species. Additionally, please evaluate whether planting larger trees browse pressure and aid in a more successful replanting effort. [25 Pa Code § 105.13(e)(1)(ix)]
20. The Vernal Pool Restoration Plan within the Site Restoration Plan indicates the disturbed areas will be reseeded with wetland seed mix. In order to avoid potential adverse effects to the ecology of the vernal pool through the introduction of species not native to the vernal

pool, consider removing this language and allow the vernal pool area to revegetate naturally. *[25 Pa Code § 105.14(b)(4)]*

21. The project does not provide a monitoring plan for impacted water resources. Please provide a monitoring plan including parameters for success and adaptive management procedures in the EA Module S4 and reference this plan within the Restoration Site Plans. Monitoring shall be submitted to the Department in the spring and fall for the first two (2) calendar years following construction and annually for three (3) years thereafter. *[25 Pa Code §§ 105.13(e)(1)(ix) & 105.21(a)(1)]*
22. Exhibit 38 of Exhibits and Enclosures 3, Section 3.2 of Attachment 10 Noxious Weed and Invasive Plant Management Plan states, “Where noxious weed and invasive plant species populations in disturbed areas exceed the density of adjacent, undisturbed locations, Transco will consult with a state-certified applicator and applicable regulating agency to choose the most effective method of control (i.e., herbicide, mechanical, etc.)” and that “prevention methodology will be considered successful if the density and cover of noxious weed and invasive plant species does not exceed the density and cover of that on adjacent, undisturbed lands.” Consider inserting this language in the Long Term Operation and Maintenance Schedule on the Restoration Plan and PSCM Plan and reference the plan within Modules S4 during site monitoring. *[25 Pa Code § 105.21(b), 105.13(e)(1)(ix)]*
23. Please review the list of Table 1.2-1 Designated Noxious Weeds of the State of Pennsylvania and provide updated species to be aligned with current lists, if necessary. Please review and update Table 2.1-1 for the Quarryville Loop and address within Module S4. Additionally, the term Invasive Plant is ambiguous, consider correcting language. *[25 Pa. Code § 105.21(b), 105.13(e)(1)(ix)]*
24. Please provide a copy of the Erosion and Sediment (E&S) Control Plans for the Joint Permit Application. *[25 Pa Code § 105.21(a)(1)]*
25. It is difficult to distinguish 105 features in the E&S Plans. Please show floodways and differentiate wetland types on the E&S Plans. *[25 Pa Code § 105.13(g)]*
26. Please display on the Erosion and Sediment Control Plans the locations of the proposed Wetland Equipment Crossing (WEC) and stream crossings. *[25 Pa Code § 105.21(a)(1)]*
27. Please provide the method for construction within wetlands on the Erosion and Sediment Control Plans. *[25 Pa Code § 105.21(a)(1)]*
28. Timber mat bridges in wetlands should have geotextile underlayment. Please review details and revise accordingly. *[25 Pa Code § 105.13(e)]*
29. The Department does not recommend stockpiling soil or subsoil within wetlands. Evaluate the ability to stockpile soils outside wetland boundaries throughout project when possible. If this is not feasible, please place wetland soil on a timber matting with geotextile or

composite matting. Please review construction details and revise accordingly. *[25 Pa Code § 105.13(e)]*

30. Please verify the Bridge Equipment Crossings details has the siderails wrapped with geotextile fabric, in addition to having the fabric under the bridge, to prevent sediment from falling into the stream. *[25 Pa Code § 105.13(e)]*
31. Please discuss the ability to use naturally decomposing fiber matting in lieu of bio-or photodegradable plastic mesh erosion control blankets near wetlands and watercourses. *[25 Pa Code §§ 105.16(d) and 105.13(g)]*
32. Please review the location of trench plugs at all resources. Trench plugs should be placed within 10 feet of the edge of wetlands (e.g. W-T-02-012A-1 only has trench plug) as stated in the Wetland Crossing Configuration. *[25 Pa Code § 105.21(a)(1)]*
33. The Exhibit 17 within Exhibit and Enclosures 1 indicates measures proposed to protect public safety in public recreation areas. Please update the plan drawings to include these notifications in the sequence and locations in the plans. *[25 Pa Code §§ 105.14(b)(5) & 105.21(a)(1)]*
34. The E&S Plan notes a Sequence of Construction for Stream Crossings. Please provide a Sequence of Construction for Wetland Crossings, referencing all pertinent information. *[25 Pa Code §§ 105.13(e) & 105.14(b)(4)]*
35. DEP suggests the addition of the following note, or similar, to all wetland construction procedure details: (1) The Environmental Inspector is required to be onsite for all crossings to determine if a fragipan or restrictive layer is present. (2) If a restrictive layer, including but not limited to clay or fragipans, is encountered during the trench excavation of a wetland, a knowledgeable wetlands scientist on the Environmental Inspection Team shall oversee the use of “Triple lift trench line technique”, backfilling of the trench, and installation of trench plugs, in order to maintain wetland hydrology. *[25 Pa Code §§ 105.13(e) & 105.14(b)(4)]*
36. The Module S4 discusses use of “Triple lift trench line technique.” The E&S Plan contains “dry, saturated, and flooded” wetland details. Please verify this technique is in the E&S plans or provide detail. *[25 Pa Code § 105.21(a)(1)]*
37. The BMP manual suggests “Erosion control blankets should be used for all seeded areas within 50 feet of a surface water — 100 feet of a special protection water — regardless of slope.” Please review the need for ECB around wetlands (e.g. W-T-02-012A-1 does not have ECB on one side). Please also review language of General Note 34, as it only states 50 feet for all surface water, and does not address special protection waters. *[25 Pa Code § 105.13(g)]*
38. Please provide a full and complete copy of all files for final file storage. *[25 Pa code § 105.21(a)(1)]*

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 30, 2025**, or DEP may consider the application to be withdrawn by the applicant.

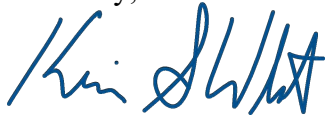
You may request a time extension, in writing, before **September 30, 2025** to respond to deficiencies beyond the sixty (60) calendar days. Requests for time extensions will be reviewed by DEP and considered. You will be notified in writing of the decision either to grant or deny, including a specific 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.

The PAYback program amends the former Permit Decision Guarantee program. [Executive Order 2023-07](#) requires the Department to abide by established review times for each authorization. The PAYback program became effective November 1, 2023, as required by Executive Order 2023-07. Chapter 105 applications or registrations received by the Department on or after that date are subject to this policy and are potentially eligible for Pennsylvania's PAYback program. More information is available on the [PAYback website](#).

Should you have any questions regarding the identified deficiencies, please contact Michael Luciani at 570.826.2597 or [mluciani@pa.gov](mailto:mluciani@pa.gov) and refer to the Application Number 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.

Director

Regional Permit Coordination Office

cc: WSP USA (by email)  
U.S. Army Corps of Engineers, Baltimore District (by email)

PA Fish & Boat Commission, Division of Environmental Services (by email)  
Lancaster County Conservation District (by email)  
SCRO Regional ARD (by email)  
SCRO Regional Waterways and Wetlands (by email)  
Drumore Township (by email)  
East Drumore Township (by email)  
Eden Township (by email)