

Via email

November 20, 2025

Ms. Kendra Schiappa {kendraschiappa@penngeneralenergy.com}
Pennsylvania General Energy Co LLC
120 Market St.
Warren, PA 16365

Re: Technical Deficiency Letter
Saluda Access Road and Staging Area
DEP File No. E4129225-017
APS No. ID No. 1147529
Gamble & Cascade Townships, Lycoming County

Dear Ms. Schiappa:

The Department of Environmental Protection (DEP) has reviewed the above referenced application package and has identified the following significant technical deficiencies. The deficiencies are based on applicable laws and regulations, and the guidance sets forth DEP's preferred means of satisfying the applicable regulatory requirements.

The Department has determined that additional information and/or corrections must be provided in order to continue processing your permit applications.

Clarify and provide further information on the following:

Technical Deficiencies

1. §105.14(b)(4), §105.13(e)(1)(x). PNDI search 841801 was re-submitted on August 6, 2025. All updated clearance letters have not been provided.
 - a. PA DNCR. Recommend the DCNR Botanical survey protocols.
 - b. PABC. Further review of this project is necessary to resolve the potential impact(s)
 - c. USFWS. USFWS IPaC approval and/or clearance letter needed.
2. §105.13(e)(1)(iii), §105.13(e)(1)(x). The stated project purpose is to access the existing COP Tract 724 Pad A well pad, a proposed future Pad G well pad, and a proposed gravel staging pad. It is unclear why the portion of the road between Wallis Run Road and the proposed staging pad (Stations 0+00 through 73+00) is necessary since access to the project area already exists.
 - a. Provide an explanation of the purpose and need for this project.
 - b. Provide a statement on water dependency.
3. §105.13(e)(1)(viii). A detailed alternative analysis that details alternate routes and/or alignments evaluated to avoid and/or minimize impacts to aquatic resources has not been provided.
 - a. The application does not provide a detailed discussion of non-discharge BMPs including alternative siting including alternative location and configuration, limited disturbed area, limited extent and duration, and minimization of impacts to riparian forest buffers. This should include an overall discussion on the overall project need as proposed.

- b. The alternatives analysis presents only one other option that is a slight variation to the selected route, though access to the project area currently exists via Butternut Grove Road. Please provide analysis of utilizing the existing routes to access the project area to avoid or minimize environmental impacts.
- c. The alternative analysis states that the road and staging area were designed based on the DCNR Guidelines for Administering Oil and Gas Activity on State Forest Lands and that coordination with DCNR continued throughout project design and included site visits to discuss constraints and alternatives. Please provide documentation of these discussions with DCNR including any mapping of non-development areas or other constraints stated by DCNR, and how the proposed project is consistent with the DCNR's oil and gas development guidelines which discourage construction of new roads, implement the best practices developed by the Penn State University Center for Dirt and Gravel Roads, and aim to encourage the selection of routes that minimize impacts to recreational users and ecosystem functions.
- d. The application states that the proposed road alignment was largely dictated by the location of the existing state forest road. However, there are areas where the proposed road deviates from the existing forest road. Please provide additional information regarding locations where the proposed alignment deviates from the existing road at the listed locations.
 - i. Station: 37+00 – 48+00
 - ii. Sta. 37+00 – 48+00
 - iii. Sta. 49+00 – 53+00
 - iv. Sta. 57+00 – 64+00
 - v. Sta. 72+00 – 80+00
 - vi. Sta. 131+00 – 141+00
 - vii. Sta. 152+00 – 202+00

4. §105.13(e)(1)(i). Site Plan Drawings

- a. The plans do not provide cross-sections at standard locations and sensitive areas.
- b. The plans indicate that a portion Stream 20230822-1412-JT will be 'reconstructed' between Stations 31+00 and 34+00. The plans do not include cross sections or plan details of the stream relocation. Please provide cross sections and plan details of the proposed stream relocation, and an explanation of why the road could not be designed to avoid relocating the stream.
- c. The plans do not provide pipe profiles for all stream crossings.
- d. Provide additional evaluation on minimization of disturbance within stream areas and update plans as necessary. Drop inlets, manholes and riprap aprons within streams have been designed as E&S BMPs. Please reevaluate the need for and consider greatly reducing or removing the E&S BMPs to minimize impacts to and protect the natural regime of the stream resources and update the plans as necessary.
- e. Plans do not provide excavation limits for structures located at station 4+00 and 31+00.
- f. Provide further clarification on the plans where the "Existing Tax Parcel Lines" separate from Dad Dad Chapman Road aka "Existing DNCR Access Trail".
- g. Provide further clarification on why the project proposes bituminous paving from approximate station 31+00 (culvert 2-1) to station 60+00 (culvert 3-1).
- h. Plans do not detail streambank or riparian buffer restoration details including clearing and disturbance restrictions or restoration BMPs and replanting where applicable.

5. §105.13(e)(1)(x), §105.13(e)(1)(iii). Please provide clarification on how impact types were determined for each stream crossing. Many of the proposed crossings include drop inlets and rip-rap aprons. Permanent direct impacts to stream resources should include the entire footprint of the drop inlet, the culvert/road, and any outlet structures not using native materials.
6. §105.20a(a). The application states that compensatory mitigation for permanent wetland impacts (0.049 ac. PEM, 0.002 PFO) would be provided by purchasing credits at the Babb Creek Mitigation Bank at 1:1 ratio. The Department does not feel this is adequate to offset the project impacts since the project proposes impacts to EV surface waters and requests a 3:1 ratio for all permanent project impacts for both streams and wetlands.
7. §105.14(b)(4). Comments were received from the Pennsylvania Fish and Boat Commission, a commenting agency to the Department. Provide a response to the following:
 - a. The proposed project will cross 34 streams within the watershed classified as ephemeral, intermittent, or perennial and their floodplains impacting 0.21 acres and 4.03 acres of these aquatic resources respectively. Although many of the proposed impacts occur on ephemeral and intermittent waterways, three perennial streams will be impacted. Given this, it is the Commission's opinion that additional alternatives that avoid aquatic resource impacts in the project area should be investigated, or compensatory mitigation to offset impacts to riparian buffer zones and/or address stream erosion issues should be provided.
 - b. According to the proposed Erosion and Sedimentation Control Plan, rock aprons of various dimensions are to be installed at the outlets of stream crossings to avoid erosion. As with the culverts at these crossings, the rock aprons should also be depressed at least six inches below the existing streambed level and native streambed materials stockpiled during construction should be replaced to fill the interstitial spaces of the rock to ensure surface flows are not lost.
 - c. Due to the proposed alignment of the access road, stream channel S-20230822-1412-JT and its floodway are to be impacted for an unknown length. This will require relocation of the existing channel. Please provide a longitudinal profile and cross sections of the existing channel as well as construction details depicting the location, profile, and cross section of the reconstructed channel.
 - d. Wetland impacts totaling 0.051 acres are proposed to be mitigated off site at Resource Environmental Solution's Babb Creek Mitigation Bank which services subbasin 09 as defined in the Pennsylvania State Water Plan. Impacts occurring to wetlands in the Wallis Run watershed, a tributary to Loyalsock Creek, fall within subbasin 10 which is outside the approved service area. Therefore, the applicant should identify alternative mitigation opportunities.
8. §105.13(e)(1)(ix) In the application materials, it is stated: The impacted PFO wetland will be replanted with tree species found in the surrounding wetland. Signage will be installed around the wetland W-20230821-1334-JT planting area to alert third parties and pipeline maintenance crews that the area is protected, and vegetation should not be disturbed. Tree shelters or wire fence will also be utilized to protect these plantings from damage by wildlife. Additionally, it is stated that appropriate wetland and riparian seed mixes will be utilized to help reestablish and diversify wetland and riparian plant communities. Plan Sheet C904 and detail C904A do not include these details and there are no wetland and riparian seed mixture details provided. Provide restoration plans and details for all wetland and stream riparian areas.
9. §105.18a(6). Under Section S3.H Cumulative Impacts Evaluation, the application states *impacts associated with this project would contribute to the overall cumulative impacts of the natural gas infrastructure that currently exist in the vicinity of the proposed project.* §105.18a(6) requires that the

applicant demonstrates in writing that the cumulative effect of this project and other projects will not result in an impairment of the Commonwealth's exceptional value wetland resources. Provide further discussion on cumulative impacts and how specifically this project will not result in an impairment to exceptional value wetland resources.

Pursuant to 25 Pa. Code §105.13(e)(4) 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 January 20, 2026 or DEP may consider the application to be withdrawn by the applicant.** Please submit the response to Public Upload using the corresponding reference number or pin number from the original submission.

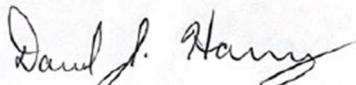
You may request a time extension, in writing, to respond to deficiencies beyond the sixty (60) calendar days. Requests for time extensions will be reviewed by DEP and considered. You will be notified in writing of the decision either to grant or deny, including a specific due date to respond if the extension is granted. Time extensions shall be in accordance with 25 Pa. Code §105.13(e)(4).

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 me at 570-327-3760 or cmileto@pa.gov, and refer to Application No. E4129225-017, Authorization No. 1544360 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,



Daniel Harvey, P.E.
Environmental Group Manager
District Oil and Gas Operations

cc: Peter Staudenmeier, Civil & Environmental Consultants, Inc. pstaudenmeier@cecinc.com
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