



Via email

February 9, 2026

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

Re: Pre-Denial Technical Deficiency Letter
Saluda Access Road and Staging Area
DEP Joint Permit 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 your application and subsequent submissions and has determined that the following significant deficiencies still remain:

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. Please provide all updated clearance letters.
 - a. PA DPCR. We recommend the DCNR Botanical survey protocols.
Applicant Response 1a: On August 28, 2025, DCNR issued a clearance letter with avoidance measures, and then provided a revised clearance letter with avoidance measures on October 28, 2025.
 - b. PABC. Further review of this project is necessary to resolve the potential impact(s)
Applicant Response 1b: On November 4, 2025, PFBC issued a clearance letter with recommended actions to minimize impacts to timber rattlesnake during construction.
 - c. USFWS. Please provide USFWS IPaC approval and/or clearance letter.
Applicant Response 1c: CEC completed the Northeast Determination Key (DKey), which resulted in a determination of "No Effect" for northeastern bulrush. CEC also completed the Northern Long-eared Bat and Tricolored Bat DKey which required a hibernacula survey.
 - *On November 13, 2025, PGC issued a clearance letter with conservation measures, which PGE intends to follow.*
 - *The USFWS has not issued a determination for the federally listed bat species, but we expect to receive its response soon. We respectfully request that the DEP continue to review this project while we await our response from the USFWS, and understand that no permit will be issued until this response is received and submitted to the PADEP.*

DEP Response: Please provide USFWS clearance. The DCNR letter dated October 28, 2025 lists the conservation measures for this project however plan drawings do not depict the implementation of these measures. Provide clarification if additional consultation with DCNR is ongoing regarding the measures along portions of the access road adjacent to vernal pool areas and update plan drawings as needed.
3. §105.13(e)(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.

3a. The application does not provide a detail 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.

Applicant Response 3a: The proposed compost sock infiltration berms are based on an alternative berm design that DCNR developed and had been approved by PADEP to limit disturbance and tree clearing on state forest lands. Additionally, the berms are proposed within “Areas of Tree Clearing Minimization” as depicted on the plans. No tree clearing will occur in these areas. Additionally, these areas are to have disturbance limited to the maximum extent practicable throughout construction. Orange construction fence should be placed to minimize the potential for inadvertent disturbance during the erosion and sediment control phase. The vegetation in these areas should only be removed as required to install and maintain the erosion and sediment control best management practices and the post construction stormwater management stormwater control measures as required. No other disturbance is permitted throughout the duration of construction activities. By utilizing this alternative infiltration berm design and avoiding tree clearing in these areas, PGE is protecting riparian forest buffers to the extent practicable while adhering to the PADEP’s post construction stormwater management requirements.

DEP Response: The revised alternatives analysis does not discuss alternative siting options for the project relating to the potential to site future well pads and access roadway outside of state forest lands.

3di. 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 an explanation of why the proposed alignment is deviating from the existing road at the following locations. Provide additional clarification as to why the project deviates from the existing trail without restoring the existing trail near these stations.

i. Station: 37+00 – 48+00

Applicant Response 3d i.: The proposed access road deviates from the existing roadbed in this area to avoid impacts to multiple streams and wetlands along the existing road. The existing road parallels four streams (S-20230823-1150-JT, S-20230823-1211-JT, S-20230823- 1130-JT, and S-20230823-1258-JT) and one wetland (W-20230823-1258-JT). Following the existing road alignment would require realigning all four of these streams and filling portions of the wetland. The proposed route greatly reduces impacts to resources by shifting the alignment downslope off the existing roadbed.

Additionally, PGE proposes to reclaim the existing roadbed in this area and remove culverts from Streams S-20230822-1243-JT, S-20230823-1130-JT, S-20230823-1225-JT, and S-20230823-1240-JT to further reduce impacts. Module S4 of the Environmental Assessment has been revised to include the roadbed reclamation and culvert removal.

DEP Response: Given that both sides of the road are within State Forest land, evaluate the potential to minimize impervious areas through restoration of the existing trail specifically where the existing trail is parallel and immediately adjacent to the proposed roadway. The comment response includes culvert reclamation exhibits providing a general overview of areas to be reclaimed. All proposed disturbance activities should be included within the limits of disturbance and detailed on plan drawings.

The updated Environmental Assessment does not separate restoration/culvert removal and replacement impacts from new project impacts. Provide plan drawings that illustrate areas that are being utilized as onsite restoration (e.g., access road restoration areas, culvert removal areas, replanting areas, etc...) Additionally, provide clarification of the total extent of restoration activities and how these areas will offset mitigation requirements.

ii. Sta. 37+00 – 48+00

Applicant Response 3d ii.: Please see response above

DEP Response: See response above

iii. Sta. 49+00 – 53+00

Applicant Response 3d iii: The proposed access road deviates from the existing roadbed in this area to straighten the road to accommodate large trucks. While the proposed road does result in more assumed floodway impacts to Stream S-20230823-1500-JT, it avoids wetland and stream impacts.

DEP Response: See response above

iv. Sta. 57+00 – 64+00

Applicant Response 3d iv. : The proposed access road deviates from the existing roadbed in this area to avoid impacts to Streams S-20230824-1341-DJ, S-20230824-1303-DJ, and S20230824-1304-DJ, and to cross Streams S-20230824-1355-DJ, S-20230824-1304-JT, and S-20230824-1305-DJ at right angles. Following the existing roadbed in this area would result in greater impacts to streams.

DEP Response: See response above

v. Sta. 72+00 – 80+00

Applicant Response 3d v. : The proposed access road deviates from the existing roadbed to provide sufficient horizontal curvature for large trucks while avoiding the steep existing slope north of the road near Sta. 71+00. The proposed route largely avoids impacts in this area except for a small portion of the assumed floodway of Stream S-20230824-1215-DJ.

DEP Response: See response above

vi. Sta. 131+00 – 141+00

Applicant Response 3d vi. : The proposed access road deviates from the existing roadbed in this area to straighten the road and provide the appropriate horizontal geometry to accommodate large truck movements. The realignment in this area was also influenced by the avoidance of Streams S-20230823-1300-DJ and S-20230823-1308-DJ between Sta. 123+00 and 125+00 which are crossed by the existing road. By shifting the road upslope to avoid these two streams, the geometry leant itself to maintaining a straighter alignment between Sta. 131+00 and 141+00 and crossing Streams S-20230823-1117-DJ, S-20231017-1725-JR, and S-20230822-0014-DJ upstream of the existing road crossings. Also, by realigning between Sta. 131+00 and 141+00, the proposed route crosses one less stream (S-20230823-1108-DJ) than the existing road. Therefore, the proposed alignment between Sta. 123+00 and 141+00 crosses three less streams than the existing road, thereby reducing impacts to streams in this area. Additionally, PGE proposes to reclaim the existing roadbed in this area and remove culverts from Streams S-20230823-1300-DJ, S-20230823-1308-DJ, S-20230823-1117-DJ, and S-20230822-0014-DJ to further reduce impacts. Module S4 of the Environmental Assessment has been revised to include the roadbed reclamation and culvert removal.

DEP Response: See response above

vii. Sta. 152+00 – 202+00

Applicant Response 3d vii. : The proposed access road deviates from the existing roadbed in this location to avoid a DCNR Non-development Area for Vernal Pond Habitat. The existing roadbed crosses through an area of high density of vernal pond habitat. The road was routed around this area to avoid impacts to this sensitive habitat. Refer to new Appendix F of the Environmental Assessment which includes a map of the non-development areas and to Appendix A for the Waters Delineation Report which includes mapping showing the vernal ponds identified along the existing access road in this area.

DEP Response: See response above

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

4a. The plans do not provide cross-sections at standard locations and sensitive areas.

Applicant Response 4a. : Cross-sections at 50' increments have been provided from Stations 0+00 to 72+00 and at 100' increments from Stations 72+00 to 204+00 and are included as drawings C500-C507 in the revised Erosion and Sediment Control Plan set. Additionally, the Site-Specific Drawings, which include cross sections of wetlands and streams impacted by the project, have been revised and are attached.

DEP Response: Provide additional details in the stream cross sections including proposed vs existing grades.

4b. 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.

Applicant Response 4b : Stream S-20230822-1412-JT is located in a roadside ditch. PGE is realigning the ditch to improve drainage along the proposed access road. The ditch will be lined with native alluvium and armoring will be avoided where possible. The revised Site-Specific Drawings include cross sections and longitudinal profiles of the stream. Attached are additional photos of the stream located in the roadside ditch.

DEP Response: Provide additional details in the stream cross sections including proposed vs existing grades.

4c. The plans do not provide pipe profiles for all stream crossings.

Applicant Response 4c: Profiles for all stream crossings have been included on drawings C402- C403 in the revised Erosion and Sediment Control Plan set. Please note that all pipes but Culvert 2-1 (Stream Crossing 2-1) and Culvert 2-6A (existing ditch/channel) have been replaced with French mattresses. Additionally, pipe profiles for all Cross Culverts have been included on drawings C400-C401 in the revised plan set.

DEP Response: Please provide detailed cross sections at a scale suitable for review showing existing vs proposed grades and BMPs such as ditches, culvert inlet and outlet dimensions, etc. at sensitive locations.

4d. 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.

Applicant Response 4d: Previously proposed drop inlets, manholes, and riprap aprons have been replaced (outside of Culvert 2-6A) with French mattresses. Profiles for all French mattresses have been included on drawings C402-C403 in the revised Erosion and Sediment Control Plan set. The Site-Specific Drawings have also been revised, the culvert calculations have been replaced with calculations for the French mattresses, and the project impacts have been recalculated. The Aquatic Resource Impact Table, Permit Fee Calculation Worksheet, Permit Fee Table, and Tables 4-1 through 4-5 of the Environmental Assessment have been revised. The French mattress calculations and revised impact tables are attached. The permit fee decreased; therefore, no additional permit fee is required.

DEP Response: Provide a discussion as to the justification for using French mattresses vs open bottom structures vs regular culverts at each stream crossing. If French mattresses are to be utilized, provide additional details in the stream cross sections including French mattress construction specifications, reasons for depth of mattresses, and sizing of the mattresses.

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 would include the entire footprint of the drop inlet, the culvert/road, and any outlet structures not using native materials.

Applicant Response 5: Wetland, stream, and floodway area located within the limits of grading, and thus filled by the project, were classified as permanent direct impacts. This includes the portions of streams located under the proposed bridge replacement, culverts, and French mattresses. Wetland, stream, and floodway area located within the project limits of disturbance but outside of the limits of grading were classified as temporary direct impacts since there will be no loss of aquatic resource area. The footnotes of Table 4-2 have been revised to describe how impacts were classified for the project.

DEP Response: Provide a discussion as to the justification for using French mattresses vs open bottom structures vs regular culverts at each stream crossing. Where French mattresses are to be used, provide additional details in the stream cross sections including French mattress construction specifications, reasons for depth of mattresses, and sizing of the mattresses. Additionally, clarify on project plans and sequencing whether or not timber mats will be utilized as shown on the E&S plans. Confirm impact lengths between impact tables, environmental assessment, and throughout the application.

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.

Applicant Response 6: PGE proposes to reclaim approximately 4,254 feet of the existing DCNR Access Road, including the removal of ten culverts to restore 174 linear feet of stream. Additionally, three existing culverts, totaling 56 linear feet, will be replaced along the proposed road alignment with French Mattresses. With this, PGE requests that 230 linear feet of permanent stream impacts be removed from compensatory mitigation requirements. Additionally, PGE requests that PADEP consider a lower mitigation ratio since PGE will be restoring significant portions of the existing DCNR access road on site and because mitigation banks are the preferred method of compensatory mitigation by the U.S. Army Corps of Engineers and the PADEP due to lack of temporal lag and a better rate of success than onsite permittee-responsible mitigation. Mitigation banks also typically produce higher quality mitigation than onsite permittee-responsible mitigation due to the larger scale of the resources being restored.

Module S4 has been revised to detail the DCNR Access Road reclamation and culvert removal. A new figure (Figure 4-5) detailing the reclamation areas and culvert removal locations is also included.

DEP Response: Provide clarification of the total extent of restoration activities and how these areas will offset mitigation requirements.

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:

7.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.

Applicant Response 7c : Stream S-20230822-1412-JT is located in a roadside ditch. PGE is realigning the ditch to improve drainage along the proposed access road. The ditch will be lined with native alluvium and armoring will be avoided where possible. The revised Site-Specific Drawings include cross sections

and longitudinal profiles of the stream. Please refer to the attached additional photos of the stream as it currently exists in a roadside ditch.

DEP Response: Please provide detailed cross sections at a scale suitable for review showing existing vs proposed grades and BMPs such as ditches, culvert inlet and outlet dimensions, etc. at sensitive locations.

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.

Applicant Response 8: CEC has updated the Site Plan to include all restoration plans and details for riparian areas and specifications for the proposed riparian and wetland seed mixes (Drawings C322-341).

DEP Response: Provide clarification of the total extent of restoration activities and how these areas will offset mitigation requirements.

9. § 105.18a(6). Under Section S3.H Cumulative Impacts Evaluation, the applicant 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.

Applicant Response 9: PGE has considered all components of the project when planning and designing the project to help minimize overall cumulative impacts. The proposed project will support construction and operations of existing Pad A and four future well pads: Pad B (14 wells), Pad C (14 wells), Pad D (17 wells) and Pad G (21 wells). Well pads have been designed to accommodate additional wells compared to common industry practices to reduce the need for additional well pads. Infrastructure clustering will be implemented where possible. Pad C has been proposed to function as a staging area to support construction activities until drilling can commence on the pad, eliminating the need for additional workspaces within the project area. The proposed project also assisted with siting for required well laterals and temporary waterlines to avoid resource impacts and sensitive recreation areas within the Loyalsock State Forest. Future well laterals and waterlines will utilize the proposed access road corridor to reduce new disturbance. Please reference the attached revised Environmental Assessment and new Appendix F for additional details regarding the cumulative impact of the project.

DEP Response: Provide additional discussion detailing the cumulative impact of the construction activities, restoration, and mitigation associated with this project.

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. Responses to this letter are due by close of business March 13th, 2026.

As per the Permit Decision Guarantee process, we are now requesting your presence for a meeting to be held at Northcentral Regional Office on Wednesday, February 18, 2026 at 10:00AM. If another date and/or time would be more

suitable for you, please contact me to reschedule. This meeting should occur within the next 30 calendar days, or the Department will base its decision on the information received to date.

Sincerely,



Alexandria Barravecchio
Environmental Program Manager
District Oil and Gas Operations

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