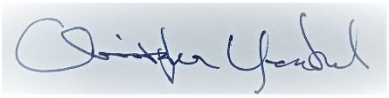
COMMONWEALTH OF PENNSYLVANIA – DEPARTMENT OF ENVIRONMENTAL PROTECTION

ENVIRONMENTAL REVIEW FOR CHAPTER 105 APPLICATIONS

Applicant	Pennsylvania General Energy Company, LLC	**County**	Lycoming	**App #**	E4129225-017
Project Name	Saluda Access Road and Staging Area	**Engineer**	C. Mileto	**APS #**	1147529

Environmental Recommendation:		**Date**	**Approve**	**Deny**	**Withdraw**
Reviewing Biologist	E. Chambers	04/22/2026	☐	☒	☐

Environmental Supervisor Review:		**Date**	**Concur**	**Not Concur**
Biologist Supervisor	C. Yeakel 	04/22/2026	☒	☐

A. Review of Application	**Yes**	**No**
1. Has any of the regulated work been completed?	☐	☒
2. Special conditions recommended in Sections G & H?	☐	☒

3. Project impacts and mitigation.		Acres	Linear Feet
Permanent Impacts	to waters:	1.928 - floodway	436.7
	to wetlands:	0.048	
Temporary Impacts	to waters:	3.201 - floodway	
	to wetlands:	0.082	
Mitigation	to waters:	NA	229 on-site
	to wetlands:	0.14 – Babb Creek Mitigation Bank 0.035 – on-site replanting	

1. **Project Description:** Pennsylvania General Energy Company, LLC (PGE) proposes to construct a 3.9-mile-long access road and staging area in Gamble and Cascade Townships, Lycoming County. The project would be located on State Forest Tract 724 and would begin at a Pennsylvania Department of Conservation and Natural Resources (DCNR) easement along Wallis Run Road and generally follow an

existing gravel roadway, continue along most of the course of Dad Dad Chapman Road, and end at the northern terminus of Butternut Grove Road. The proposed road would provide access to existing and proposed well pads and a staging area that would be converted to a well pad after the road and a future pipeline are constructed. The proposed limit-of-disturbance (LOD) is 43.8 acres.

Key Dates in the review of this project are as follows:

10/03/2025 - Joint Permit & ESCGP applications received.
10/06/2025 - Application administratively complete.
10/30/2025 - Department sent technical deficiency letter for ESCGP application.
11/01/2025 - Application published in the PA Bulletin.
11/08/2025 - Department received first public comments.
11/12/2025 - Department meeting with PGE to discuss ESCGP deficiencies.
11/18/2025 - Department received agency comments from PFBC.
11/20/2025 - Department sent technical deficiency letter for Joint Permit application.
12/19/2025 - Department meeting with PGE and RES to discuss project mitigation.
12/22/2025 - Department meeting with DCNR.
12/23/2025 - Technical deficiency response comments received for ESCGP.
12/24/2025 - Department received written comments from DCNR.
01/03/2026 - Department published a notice of public hearing.
01/07/2026 - Technical deficiency response comments received for Joint Permit application.
01/08/2026 - Department sent pre-denial technical deficiency comments for ESCGP application.
02/03/2026 - Department hosts public hearing.
02/09/2026 - Department sent pre-denial technical deficiency comments for Joint Permit application.
02/11/2026 - Final public comments received.
02/18/2026 - Department meeting with PGE to discuss pre-denial technical deficiency comments.
03/20/2026 – Pre-denial technical deficiency response comments received for Joint Permit.
03/20/2026 – Pre-denial technical deficiency response comment received for ESCGP.

Many of the public comments received by the Department requested a public hearing. On January 03, 2026, the Department published notice of a public hearing to be held on February 03, 2026. The public meeting resulted in additional public comments being provided. Please refer to the Comment Response document associated with this permit for a summary of the comments and the Department's responses.

2. **Stream Description:** The project is located in the Wallis Run Watershed. The Wallis Run basin has a PA Chapter 93 Designated Use of High Quality, Cold Water Fishes, Migratory Fish (HQ-CWF, MF), and is listed as having an Existing Use of Exceptional Value, Migratory Fish (EV, MF). The PFBC lists Wallis Run as and its tributaries of supporting natural reproduction of trout.

The project would involve 35 stream and floodway crossings as follows:

S-20230821-1148-JT (Wallis Run): 41.414301, -76.868102. The work at this site consists of the replacement of an existing bridge and abutments and would result in 36 linear-feet (LF) of permanent direct stream impact and 0.068 acre (2,953 ft^2) of permanent direct floodway impacts.

S-20230821-1402-JT (UNT to Wallis Run): 41.411236, -76.868866. The work at this site consists of removal of an existing culvert and installation of a prefabricated bridge and abutments and would result in 18.3 LF of permanent direct stream impacts and 0.088 acre (3,834 ft^2) of permanent direct floodway impacts.

S-20250606-1045-PMS (UNT to Wallis Run): 41.408128, -76.869093. The work at this site consists of permanent placement of fill within the floodway due to construction of the proposed road and would result in 0.028 acre (1,202 ft^2) of permanent direct floodway impact.

S-20230822-1015-JT (UNT to Wallis Run): 41.407576, -76.868770. The work at this site consists of removal of an existing culvert and installation of a prefabricated bridge and abutments and would result in 16.2 LF of permanent direct stream impact and 0.073 acre (3,195 ft^2) of permanent direct floodway impact.

S-20230822-1301-JT (UNT to Wallis Run): 41.407273, -76.868962. The work at this site consists of removal of an existing culvert and installation of a open-bottom arch culvert and would result in 32.3 LF of permanent direct stream impact and 0.219 acre (9,552 ft^2) of permanent direct floodway impact.

S-20230822-1412-JT (UNT to Wallis Run): 41.406855, -76.869182. The work at this site consists of relocation of the stream channel to facilitate construction of the access road and would result in 55 LF of permanent direct stream impacts and 0.09 acre (3,918 ft^2) of permanent direct floodway impacts.

S-20230822-1218-JT (UNT to Wallis Run): 41.406169, -76.869373. The work at this site consists of removal of an existing culvert and installation of a prefabricated bridge and abutments and would result in 17.6 LF of permanent direct stream impacts and 0.063 acre (2,737 ft^2) of permanent direct floodway impacts.

S-20230822-1243-JT (UNT to Wallis Run): 41.405820, -76.869232. The work at this site consists of installation of a prefabricated bridge and abutments and would result in 16.6 LF of permanent direct stream impacts and 0.062 acre (2,711 ft^2) of permanent direct floodway impacts.

S-20230823-1150-JT (UNT to Wallis Run): 41.405409, -76.869456. The work at this site would consist of permanent placement of fill within the floodway and would result in 0.036 acre (1,558 ft^2) of permanent direct floodway impacts.

S-20230823-1211-JT (UNT to Wallis Run): 41.405283, -76.869432. The work at this site consists of permanent placement of fill within the floodway for construction of the access road and would result in 0.029 acre (1,257 ft^2) of permanent direct floodway impacts.

S-20230823-1130-JT (UNT to Wallis Run): 41.405201, -76.868974. The work at this site consists of installation of a prefabricated bridge and abutments and would result in 17.7 LF of permanent direct stream impacts and 0.06 acre (2,633 ft^2) of permanent direct floodway impacts.

S-20230823-1225-JT (UNT to Wallis Run): 41.404767, -76.868817. The work at this site consists of installation of a prefabricated bridge and abutments and would result in 26.1 LF of permanent direct stream impacts and 0.075 acre (3,279 ft^2) of permanent direct floodway impacts.

S-20230823-1258-JT (UNT to Wallis Run): 41.404552, -76.868962. The work at this site consists of permanent placement of fill in the floodway and would result in 0.016 acre (698 ft^2) of permanent direct floodway impacts.

S-20230823-1240-JT (UNT to Wallis Run): 41.403873, -76.868515. The work at this site consists of installation of a prefabricated bridge and abutments and would result in 22.4 LF of permanent direct stream impacts and 0.09 acre (3,933 ft^2) of permanent direct floodway impacts.

S-20230823-1338-JT (UNT to Wallis Run): 41.402756, -76.868335. The work at this site consists of installation of a prefabricated bridge and abutments and would result in 22.5 LF of permanent direct stream impacts and 0.177 acre (7,730 ft^2) of permanent direct floodway impacts.

S-20230823-1500-JT (UNT to Wallis Run): 41.402087, -76.868170. The work at this site consists of permanent placement of fill within the floodway due to construction of the access road and would result in 0.129 acre (5,615 ft^2) of permanent direct floodway impacts.

S-20230823-1433-JT (UNT to Wallis Run): 41.401320, -76.868293. The work at this site consists of installation of a prefabricated bridge and abutments and would result in 20.9 LF of permanent direct stream impacts and 0.074 acre (3,225 ft^2) of permanent direct floodway impacts.

S-20230824-1351-DJ (UNT to Wallis Run): 41.400782, -76.868955. The work at this site consists of permanent placement of fill within the floodway for construction of the access road and would result in 0.035 acre (1,512 ft^2) of permanent direct floodway impacts.

S-20230823-1423-JT (UNT to Wallis Run): 41.400791, 76.868148. The work at this site consists of temporary floodway disturbance for construction of the access road and would result in 0.055 acre (2,388 ft^2) of temporary direct floodway impacts.

S-20230824-1355-DJ (UNT to Wallis Run): 41.400225, -76.869063. The work at this site consists of installation of a prefabricated bridge and abutments and would result in 22.2 LF of permanent direct stream impacts and 0.069 acre (3,017 ft^2) of permanent direct floodway impacts.

S-20230824-1341-DJ (UNT to Wallis Run): 41.400034, -76.869223. The work at this site consists of permanent placement of fill within the floodway for construction of the access road and would result in 0.006 acre (280 ft^2) of permanent direct floodway impacts.

S-20230824-1304-JT (UNT to Bar Bottom Hollow): 41.399807, -76.869382. The work at this site consists of installation of a prefabricated bridge and abutments and would result in 21.1 LF of permanent direct stream impacts and 0.042 acre (1,847 ft^2) of permanent direct floodway impacts.

S-20230824-1305-DJ (UNT to Bar Bottom Hollow): 41.399630, -76.869446. The work at this site consists of installation of a prefabricated bridge and abutments and would result in 24.8 LF of permanent direct stream impacts and 0.066 acre (2,881 ft^2) of permanent direct floodway impacts.

S-20230824-1303-DJ (UNT to Bar Bottom Hollow): 41.399572, -76.869670. The work at this site consists of permanent placement of fill within the floodway and would result in 0.008 acre (345 ft^2) of permanent direct floodway impact.

S-20230824-1215-DJ (UNT to Bar Bottom Hollow): 41.396588, -76.871855. The work at this site consists of the temporary placement of fill within floodway and would result in 0.046 acre (1,984 ft^2) of permanent direct floodway impacts.

S-20230824-1140-DJ (UNT to Bar Bottom Hollow): 41.396780, -76.875664. The work at this site consists of temporary placement of fill within the floodway and would result in 0.011 acre (490 ft^2) of temporary direct floodway impacts.

S-20231018-1612-AC (UNT to Bar Bottom Hollow): 41.397486, -76.846383. The work at this site consists of permanent placement of fill within the floodway and would result in 0.004 acre (1,762 ft^2) of permanent direct floodway impacts.

S-20230823-1415-DJ (UNT to Bar Bottom Hollow): 41.396340, -76.876544. Work at this site consists of permanent placement of fill within the floodway and would result in 0.007 acre (288 ft^2) of temporary direct floodway impacts.

S-20230823-1233-DJ (UNT to Jacoby Hollow): 41.397122, -76.884999. Work at this site consists of temporary placement of fill within the floodway and would result in 0.003 acre (142 ft^2) of temporary direct floodway impacts.

S-20230823-1117-DJ (UNT to Jacoby Hollow): 41.391460, -76.888282. Work at this site consists of installation of a prefabricated bridge and abutments and would result in 16.8 LF of permanent direct stream impacts and 0.065 acre (2,847 ft^2) of permanent direct floodway impacts.

S-20230822-1512-DJ (UNT to Jacoby Hollow): 41.391304, -76.888150. Work at this site consists of temporary placement of fill within the floodway and would result in 0.002 acre (87 ft^2) of temporary direct floodway impacts.

S-20231017-1725-JR (UNT to Jacoby Hollow): 41.390655, -76.889243. Work at this site consists of installation of a prefabricated bridge and abutments and would result in 16.4 LF of permanent direct stream impacts and 0.015 acre (637 ft^2) of permanent direct floodway impacts.

S-20230822-0014-DJ (UNT to Jacoby Hollow): 41.390630, -76.889325. Work at this site consists of installation of a prefabricated bridge and abutments and would result in 17.3 LF of permanent direct stream impact and 0.63 acre (2,748 ft^2) of permanent direct floodway impacts.

S-20230821-0005-DJ (UNT to Jacoby Hollow): 41.385904, -76.897534. Work at this site consists of installation of a prefabricated bridge and abutments and would result in 16.8 LF of permanent direct stream impacts and 0.064 acre (2,790 ft^2) of permanent direct floodway impacts.

3. **Wetland Description:** The wetlands proposed to be impacted by the project are classified under Chapter 105.17 as "Exceptional Value" wetlands due to their location with the floodplain of an EV stream and streams that support natural trout reproduction.

   The proposed project would result in impacts to 10 wetlands as follows:

   W-20230821-1157-JT (PEM): 41.413999, -76.868121. Construction of the access road would result in 0.014 acre (333 ft^2) of permanent direct impacts and 0.008 acre (947 ft^2) of temporary direct impacts.

   W-20230821-1334-JT (PFO): 41.411644, -76.868854. Construction of the access road would result in 0.03 acre (1,616 ft^2) of permanent direct impacts and 0.037 acre (1,732 ft^2) of temporary direct impacts.

   W-20230821-1334-JT (PEM): 41.411463, -76.868903. Construction of the access road would result in 0.016 acre (786 ft^2) of permanent direct impacts and 0.018 acre (1,493 ft^2) of temporary direct impacts.

   W-20230821-1351-JT (PEM): 41.411482, -76.869004. Construction of the access road would result in 0.004 acre (170 ft^2) of temporary direct impacts.

   W-20230821-1417-JT (PEM): 41.411120, -76.868857. Construction of the access road would result in 0.003 (407 ft^2) acre of permanent direct impacts and 0.009 acre (555 ft^2) of temporary direct impacts.

   W-20230821-1425-JT (PEM): 41.411104, -76.868696. Construction of the access road would result in 0.000 acre (16ft^2) of permanent direct impacts and 0.011 acre (496 ft^2) of temporary direct impacts.

   W-20230822-1025-JT (PEM): 41.407430, -76.868826. Construction of the access road would result in 0.006 acre (244 ft^2) of permanent direct impacts and 0.011 acre (462 ft^2) of temporary direct impact.

   W-20230822-1345-JT (PEM): 41.407385, -76.868936. Construction of the access road would result in 0.007 acre (314 ft^2) of permanent direct impacts and 0.004 acre (160 ft^2) of temporary direct impacts.

   W-20230822-1600-JT (PEM): 41.407128, -76.868967. Construction of the access road would result in 0.002 acre (93 ft^2) of permanent direct impacts and 0.007 (309 ft^2) of temporary direct impacts.

W-20231017-1503-JR (PEM): 41.391374, -76.888150. Work at this site would consist of construction of the access road and would result in 0.002 acre (87 ft^2) of temporary direct wetland impacts.

4. **Mitigation Description:**

On-site Mitigation Measures

PGE states that the project was designed to avoid and minimize impacts to aquatic resources. This was accomplished by adjusting the proposed road alignment to avoid resources where possible, following an existing road corridor, and through reduction in width of the LOD at resource crossings where possible. Additionally, an alternative infiltration berm design that does not require tree clearing or extensive ground disturbance for installation was selected to satisfy post-construction stormwater management requirements. This alternative method proposed uses compost filter socks impregnated with a seed mix to establish infiltration berms.

In addition, PGE proposes to restore three sections totaling 4,254 LF of the existing roadway where it is not followed by the proposed road. This work would consist of tilling, light grading, and seeding of the roadbed to reduce impervious surface and restore more natural conditions. This work would also include the removal of 173.6 LF of culverts from streams.

To offset impacts to the 0.03-acre (1,616 ft^2) portion of forested wetland that would be cleared, PGE will re-plant .035 acre of the wetland with native trees. The plantings would be protected by tree tubes or wire fencing to reduce herbivory and wildlife damage, and signage would be installed to alert third parties that the area is protected and should not be disturbed.

Success of the proposed on-site mitigation and reclamation will require the following:

- Establishing 70% perennial vegetation cover within restoration and reclamation areas.
- Stream channels achieve stable conditions and do not show signs of instability or degradation
- The wetland planting area will demonstrate 85% survival following 1 year or supplemental planting will be required.
- Invasive species will not comprise more than 10% of the vegetative cover.

The on-site mitigation and reclamation areas will be monitored annually for a period of five years beginning in the summer of the year following construction. The monitoring reports will be submitted to PADEP by December 31 annually. Monitoring would continue beyond the five-year period until all performance standards have been achieved.

Off-site Compensatory Mitigation

The project would result in 0.049 acre of permanent wetland loss and 436.7 LF of permanent stream impacts. The on-site culvert restorations would offset a total of 229.1 LF of these impacts and no mitigation is required for the replacement of the bridge across Wallis Run (36 LF), resulting in a total of 171.6 LF of permanent stream impacts that must be mitigated for. In order to offset these impacts, PGE proposes to purchase credits at a 1:1 ratio at Resource Environmental Services, LLC's (RES) Babb Creek Mitigation Bank, located in Charleston Township, Tioga County (41.719333, -77.230202).

5. **Pre-application Meeting and Site Visits:** Pre-application meeting 06/05/2025.
6. **Erosion & Sedimentation Control:** ESG294125011-00. Denied concurrently with this permit (E4129225-017).
7. **PASPGP Category:** Eligible, Reporting. Sent to ACOE on 10/08/2025.

8. Act 14 Notifications: 09/17/2025

9. PNDI Search Date: 08/03/2025 PNDI-792055 **Review Type:** Online ☒ Large Project ☐

Describe hits, responsible agency, and resolution:

Pennsylvania Fish and Boat Commission

PGE consulted with PFBC to resolve PNDI conflicts regarding the timber rattlesnake in the project area. At PFBC's request, PGE contracted to have a rattlesnake survey completed in the project area, which identified occupied denning sites and potential gestational habitat. As a result, the PFBC requested in their letter dated 11/04/2025 that the following measures be implemented:

1. A PFBC approved Timber Rattlesnake biologist who has the proper permits (Scientific Collector's Permit), and the proper skills to handle this venomous species will be on-site during construction to inspect and clear the area (including staging areas and access roads) of Timber Rattlesnakes and to capture and remove any rattlesnakes that may interfere with work activities.

2. Timber Rattlesnakes observed on-site are to be measured, sexed, and the habitat characterized where the snake was found. All captured snakes should be released within close proximity (under 100 meters) of the capture site if possible. Rattlesnake captures and relocations are to be documented by photographs, habitat descriptions, in addition to being mapped and labeled accordingly. The biologist is to submit a report to this office (Division of Environmental Services) following the completion of the project documenting all the activity and herpetofauna encountered.

3. To replace impacted gestation/basking habitat, we recommend large rock excavated during access road construction and/or pipeline trench excavation be used to recreate the habitat following the "PFBC guidelines for Timber rattlesnake Habitat Creation". Please consult with a qualified Timber Rattlesnake surveyor and this office to identify optimal locations to implement these habitat improvements along the proposed right-of-way.

4. If erosion control fabric is to be used at this site, materials that are known to reduce the risk of snake entrapment should be selected, such as loosely woven natural fiber ECM. Use of monofilament/plastic netting should be avoided.

5. Workers responsible for implementing this project should be advised that Timber Rattlesnakes may be encountered and that avoidance is the best means of minimizing risks to personal safety. It is suggested a procedure be implemented for Timber Rattlesnake encounters and workers are to be advised that the Timber Rattlesnake is a state protected species and is not to be harmed. Killing of Timber Rattlesnakes is prohibited by the Commission pursuant to 58 Pa. Code Section 79.6.

6. During the construction period, PFBC personnel may communicate with the on-site biologist and may visit the site area periodically to view the progression of the project and answer any questions or concerns that may arise. For safety purposes, PFBC personnel will register with the on-site manager upon entering the construction area.

Pennsylvania Game Commission

The PNDI review indicated potential conflicts with the federally-listed endangered northern long-eared bat (NLEB), and the state-listed endangered little brown bat (LBB). The PGC deferred to the USFWS for concerns related to the NLEB, and provided the following comments related to the LBB:

All trees or dead snags greater than 3 inches in diameter at breast height that need to be harvested and/or trimmed to facilitate the project are to be cut between November 16 and March 31.

Prior to commencing work to replace the bridge over Wallis Run at approximately 41.414277° N, 76.868075° W, conduct a wildlife survey and report to PGC Environmental Review if birds, bats, and/or other wildlife are using this bridge. Appendix K of the USFWS Range-wide Indiana Bat and Northern Long-eared Bat Survey Guidelines (attached) is the PGC accepted survey protocol.

Additionally, the PGC provided recommendations for project development to minimize impacts to area-sensitive forest bird species. The recommendations included minimizing right-of-way (ROW) width, co-locating utilities within ROWs to minimize tree clearing, a recommended seed mix for site restoration, and seasonal mowing restrictions.

Department of Conservation and Natural Resources

The PNDI search resulted in potential conflicts to mountain bugbane, great-spurred violet, and herbaceous vernal ponds. On 08/28/2025 the DCNR found no anticipated impact per survey with avoidance measure. The avoidance measure states:

CEC documented eight Herbaceous Vernal Ponds within the study area (see Figures 2B and 2C in CEC's final botanical report dated June 2, 2025). The proposed access road was modified to completely avoid pools 6-4 through 6-8. The proposed access road will be constructed near pools 6-1, 6-2, and 6-3; however, direct impacts will be avoided. During construction, high visibility fencing will be installed in the vicinity of these three pools to avoid accidental impacts. Pool locations will be included on all project plans and communicated to relevant personnel. Project activities will also avoid the amphibian breeding season. All work will be conducted when the ground is frozen (November –January) or during drier summer months (July – August). No threatened, endangered, or special concern species were found on the project site during the most recent survey. With the avoidance of Herbaceous Vernal Ponds, DCNR has determined that no impact is likely.

Additionally, the DCNR letter included recommended best practices to minimize the potential for introducing invasive and non-native flora and reestablish native species.

United States Fish and Wildlife Service

The PNDI search indicated potential conflicts with the federally-listed NLEB. PGC screened the project using the USFWS' IPaC system which resulted in a may affect determination for NLEB. PGE contracted to have surveys completed to assess the potential impact of the project. By email dated 01/30/2026, the USFWS responded as follows:

Thanks for submitting this letter to us following our conversation earlier this week. As a brief summary, tree cutting working includes maintenance and widening of an existing road to a width of approximately 16', as well as cutting for pad locations. The amounts are summarized in Table 1 of the attached letter dated January 29, 2026. Overall, approximately 32 acres of tree removal are proposed.

On the phone call, we discussed our agency's recommendation to utilize the full time of year cutting restriction (within November 15 to March 31) as much as is practical with the project. For portions of the project where that is not feasible, we recommend avoiding cutting during the maternity season for federally listed bats, May 15 to July 31.

Based on the existing forest availability and what is to remain following construction, proximity of known roosts to the work area and other knowledge gained from bat survey effort along this project, and implementation of seasonal cutting avoidance measures, you concluded that the project is not

likely to adversely affect the northern long eared bat. You also made no effect determinations for tricolored bat and northeastern bulrush. Therefore, no further coordination with our office is necessary. Please let this email serve as documentation of technical assistance from our office.

10. **PFBC:** The PFBC provided the following specific project comments on 11/18/2025.

    According to Chapter 93, The Wallis Run watershed is classified as a High Quality, Cold Water Fishery. Additionally, Pennsylvania Fish and Boat Commission field surveys have documented the natural reproduction of trout in Wallis Run. 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.

    The Pennsylvania Fish and Boat Commission manages Wallis Run and its tributaries as waterways supporting the natural reproduction of trout. The Commission respectfully requests that a special condition be added to the permit which prohibits instream construction from October 1st through December 31st to protect the spawning and egg deposition behavior of these wild trout populations. We recommend the applicant and contractor understand the implications of this restriction and plan all instream construction accordingly.

    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.

    Due to the proposed alignment of the access road, stream channel S-20230822-1412-JT and its floodway are to be impacted for an unknow 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.

    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.

11. **PHMC:** No Above-Ground Properties Affected, 07/22/2025. No Archaeological Properties Affected, 09/09/2025.

12. **Summary:** PGE's application includes implementation of required ABACT erosion and sediment control and post-construction stormwater management BMPS, incorporates the best practices recommended by other reviewing agencies, and minimizes impacts to aquatic resources to the extent practicable. However, some engineering design concerns were identified and are discussed in the engineering record of decision for this permit and the application does not provide mitigation for a stream realignment as discussed in Section 3.b., below. With the provided information and the results of this environmental review, it has been determined that the proposed project does not meet the environmental requirements of Chapter 105. The project is proposed in a manner that will have a significant adverse effect upon safety or the protection of life, health, property or the environment. This application is therefore recommended for denial.

B. Potential Project Impacts	Yes	No
1. Potential threats to life or property?	☐	☒
2. Potential threats to safe navigation?	☐	☒
3. Riparian rights above, below, or adjacent to project?	☐	☒
4. Regimen and ecology of Watercourse?	☒	☐
5. Regimen and ecology of Body of Water?	☒	☐
6. National/state/local park or recreation area?	☐	☒
7. National/state/local cultural, archaeological, or historical site?	☐	☒
8. Public water supply?	☐	☒
9. Non-compliance with applicable laws?	☐	☒
10. Non-water dependent project?	☐	☒
11. Future development potential?	☒	☐
12. State water plan program area?	☐	☒
13. Scenic river corridor?	☐	☒
14. Exceptional Value watershed? Check if determined by Existing Use list: ☒	☒	☐
15. High Quality watershed? Check if determined by Existing Use list: ☐	☐	☐
16. Secondary impacts?	☐	☒
17. Cumulative impacts (temporary and permanent)?	☒	☐
18. Wetland vegetation, soils, or hydrology?	☒	☐
19. Exceptional Value wetlands?	☒	☐
20. Stocked trout stream?	☐	☒
21. Wild trout stream?	☒	☐
22. Threatened or endangered species?	☒	☐
23. Other species of special concern?	☒	☐

C. Record of Decision for Project Impacts	Yes	No
1. Exceptional Value Wetland criteria:		
☒ Wild trout stream ☐ Wild or scenic river ☒ EV waters		
☐ Natural or wild areas ☒ Threatened or endangered species (PNDI)		
☐ Public water supply ☐ Threatened or endangered species habitat		
a. What are the primary functions and values of the wetland(s)? *List*: Wetlands in the project area provide wildlife habitat, foraging and food chain production, some flood storage and ground-surface water transfer, and sediment and nutrient storage.		
b. Will the project have an adverse impact on the wetland's functions or values?	☐	☒

Explain: The proposed project follows an existing DCNR road so additional large wetland impacts are not proposed, and only minimal impacts to resources would occur. The DCNR has also provided a list of conditions PGE must follow to protect vernal pools and amphibians which rely on them in the project area. The area of forested wetland that would be converted to an emergent state is proposed for replanting and off-site mitigation would be provided for that impact.		
If yes, has the applicant affirmatively demonstrated that the project is necessary to abate a substantial threat to the public health and safety?	☐	☐
c. Has the applicant demonstrated that requirements of §105.18a(a)(1)-(7) are met? *Explain*: The project was designed to minimize impacts to wetlands and proposes off-site mitigation for the unavoidable impacts.	☒	☐
d. Is the project water-dependent? (Project requires access or proximity to or siting within the wetland or waters to fulfill the basic purpose) *Explain*: The project is long and linear in nature and not all impacts to wetlands were avoidable. The project alignment follows and existing gravel road and by doing so avoids new impacts to wetlands.	☒	☐
e. Is the project the least environmentally damaging alternative? *List alternatives*: The applicant considered several alternative options to the proposed project. These included the following: • The Proposed Alternative (PA): An approximately 40-acre LOD with a 3.9-mile-long permanent access road and a 5.5-acre staging pad. This route follows an existing DCNR access road. • On-Site Alternative 1 (A1): An approximately 33.3-acre LOD with a 3.8- mile-long permanent access road and 5.5-acre staging pad. This route would require construction of a new road, resulting in new impacts to streams and wetlands. • Butternut Grove Road: Utilizing this route would require modifications to the roadway to accommodate large trucks and two-way truck traffic. Due to an inability to secure landowner agreements and leases to expand the road width and provide increased turning radii, and considerations to the effects of traffic (approximately 80,000 truckloads are anticipated for full pad build out and drilling) on local residents, this route is not feasible. • Off-site Drilling: The applicant states that due to lease agreement restrictions for surface development on surrounding private lands and the presence of geological restrictions such as faults, drilling the tract from an off-site location is not feasible.	☒	☐
f. Will the project violate a state water quality standard? *Explain*: The project does not result in a significant amount of new direct impacts to wetlands and will utilize ABACT BMPs to prevent degradation of wetland resources from altered hydrologic and sediment inputs.	☐	☒
g. Will the project contribute to the pollution of groundwater or surface water or diminution of resources sufficient to interfere with their uses? *Explain*: The project does not result in a significant amount of new direct impacts to wetlands and will utilize ABACT BMPs to prevent degradation of wetland resources from altered hydrologic and sediment inputs.	☐	☒
h. Will the cumulative effect of the project and other projects result in impairment to exceptional value wetland resources? *Explain*: The project does not result in a significant amount of new direct impacts to wetlands and will utilize ABACT BMPs to prevent degradation of wetland resources from altered hydrologic and sediment inputs. Future impacts to wetland resources would	☐	☒

be associated with the proposed Saluda Pipeline and Pad G Pipeline, which would be permitted in the future.		

i. List which compensatory replacement method was used.
List: Wetlands and riparian areas within the temporary workspaces will be restored on-site with an appropriate wetland seed mix and native woody plantings. Permanent fill impacts will be mitigated at an off-site mitigation site at the appropriate ratios through creation and enhancement as discussed in the mitigation section of this Record of Decision.

2. Other Wetlands:	**Yes**	**No**
a. What are the primary functions and values of the wetland(s)? *List*:		
b. Will the project have an adverse impact on the wetland's functions and values? *Explain*:	☐	☐
c. Will the project have a significant adverse impact on the wetland's functions or values?	☐	☐
If yes, has the applicant affirmatively demonstrated that the project is necessary to abate a substantial threat to the public health and safety?	☐	☐
d. Have adverse impacts been avoided or reduced to the maximum extent practicable? *Explain*:	☐	☐
e. Is the project the least environmentally damaging alternative? *List alternatives*:	☐	☐
f. Will the project violate a state water quality standard? *Explain*:	☐	☐
g. Will the project contribute to the pollution of groundwater or surface water or diminution of resources sufficient to interfere with their uses? *Explain*:	☐	☐
h. Will the cumulative effect of the project and other projects result in impairment to wetland resources? *Explain*:	☐	☐
i. List which compensatory replacement method was used. *List*:		

3. Watercourses (check all that apply)	**Yes**	**No**
☒ EV ☐ HQ ☐ CWF ☐ WWF ☐ TSF		
☐ Class A ☐ Wilderness Trout ☒ Wild Trout ☐ Trout Stocked		
☐ Special Species ☐ State or Federal Scenic River ☐ Impaired		
a. Will the project have an impact on the following values of the environment?		
Natural	☒	☐
Scenic/Aesthetic	☒	☐
Historic	☒	☐
b. Have the impacts been avoided and minimized? *Explain*: The applicant designed the project to result in the least number and extent of impacts by following an existing DCNR road and has modified the project designs after each technical deficiency letter to reduce impacts to streams within the LOD. This has included the use of prefabricated bridges and abutments as a crossing method for most	☐	☒

of the proposed stream crossings. Additionally, PGE proposes to remove existing culverts and reclaim portions of the existing road, as discussed in Section A.4, above.

PGE does not propose mitigation for stream S-20230822-1412-JT (UNT to Wallis Run; 41.406855, -76.869182), which would be realigned during construction. Stream relocations are permanent impacts and require mitigation under §105.1.

Additionally, this stream would be located immediately adjacent to the proposed road and at sections, would be at a higher elevation than the road surface and proposed curbing. The Department is not favorable of this design as proposed because the proximity of the road would affect stream flow dynamics and in-stream habitat resulting in significant adverse impacts to the aquatic resource.

c. Is the project the least environmentally damaging alternative?

List alternatives: A majority of the project is located on Loyalsock State Forest, managed by DCNR. The project site location was selected based on the location of PGE's targeted Marcellus Shale formations on the targeted lease unit (Tracts 723 and 724) and PGE's existing COP Tract 724 Pad A. When developing an alternative analysis, PGE took into consideration guidance from DCNR, landowner constraints, identification of environmental features and existing access roads. Additionally, natural gas development on this section of the state forest lands was largely dictated by the DCNR's Loyalsock State Forest office and project constraints associated with using an existing access road (Butternut Grove Road).

PGE's analysis of utilizing Butternut Grove Road for access was thoroughly evaluated. It was determined that the road is too narrow and cannot support the proposed truck-turning radii or two-way traffic. Utilizing the access road would require significant widening or significant expansions/modifications and landowner agreements could not be obtained by PGE. Landowners cited safety concerns as a major concern for the use of Butternut Grove Road during the planning stages of PGE's Loyalsock intake project in 2019. It was stated that cars frequently park along the road for swimming at the confluence of Loyalsock and Wallis Run, which already has limited parking for access due to steep terrain. Road widening through this section could have the potential to create significant safety concerns. As Butternut Grove Road continues north, into steep terrain, there are multiple spots where the road would be too narrow for truck traffic as existing topographic constraints would make widening the road infeasible (i.e. – the edge of road is the top of bank of Butternut Grove Run).

☒ ☐

DCNR dictated several non-developmental areas for Tracts 723/724 (Figure 1, Appendix F) and the road was designed to avoid vernal pools and amphibian habitat, thrust faults, rock outcrops, steep slopes and minimize aquatic resource impacts to the greatest extent practicable. Additionally, PGE is locating the proposed staging area for the access road on the footprint of a proposed future well pad to minimize overall land disturbance.

Two main alternatives were evaluated:

- The Proposed Alternative (PA)- An approximately 40-acre LOD with a 3.9-mile-long permanent access road and a 5.5-acre staging pad. The permanent access road utilizes existing forest roads on private property and where possible within Loyalsock State Forest. The five-acre pad for the staging area avoids both DCNR non-development areas and DCNR areas of special consideration (vernal pools and amphibian habitat).

- On-Site Alternative 1 (A1)- An approximately 33.3-acre LOD with a 3.8-mile-long permanent access road and 5.5-acre staging pad. A1 would result

in similar earth disturbance and utilize a slightly shorter access road but would require 0.099 acre of permanent impacts to PFO wetlands and thirteen additional resource crossings.		
d. Has the applicant demonstrated that the public benefits of the proposed project outweigh the harm to the environment? *Explain*: See Section C.3.b.	☐	☒
e. Is the project located in or within 100 feet of a watercourse or body of water that has been designated as a national or state wild or scenic river?	☐	☒
f. Is the project located in or within 100 feet of a federal wilderness area?	☐	☒
g. Is the project located within an area which serves as a habitat of a threatened or endangered species?	☒	☐
h. Is the project located in waters classified as Exceptional Value?	☒	☐
If Yes to any (e) through (h), has the applicant demonstrated that the project will not have an adverse impact upon the public natural resource? *Explain:* The proposed project has received clearance for all potential impacts to threatened and endangered species. Impacts will be avoided by adhering to the recommendations of the commenting agencies. Implementation of ABACT BMPs and post-construction stormwater controls would minimize impacts to EV waters. Further, the project is proposing to utilize prefabricated bridges and abutments to minimize disturbance to EV waters.	☒	☐
i. Is the watercourse Navigable?	☐	☒
If Yes, has the PFBC approved the Aids to Navigation (ATON) Plan?	☐	☐

D. Sources Utilized for Review	**Yes**	**No**
1. Quad Sheet: Bodines and Barbours. 41.395062 N, 76.872834 W	☒	☐
1. National Wetlands Inventory Map?	☒	☐
2. Wilderness Trout Streams Map?	☒	☐
3. State and Federal Scenic Rivers Map?	☒	☐
4. County Soil Survey?	☒	☐
5. Aerial Photography?	☒	☐
6. Jurisdictional Determination from ACOE?	☐	☒
7. Applicant's Environmental Assessment?	☒	☐
8. Other Agencies' Review? (See Section E.)	☒	☐
9. Environmental Review Committee? (See Section F.)	☐	☒
10. Date of site inspection:	☐	☒
11. Other?	☐	☒

E. Other Agencies' Comments	Approve	Approve w/ conditions*	Deny**	No Comments
1. County Conservation District	☐	☐	☐	☒
2. PA Fish and Boat Commission	☐	☒	☐	☐
3. PA Game Commission	☐	☒	☐	☐
4. PA DCNR	☐	☒	☐	☐
5. PA Historical and Museum Commission	☒	☐	☐	☐
6. US Fish and Wildlife Services	☐	☒	☐	☐
7. US Army Corps of Engineers	☐	☐	☐	☒
8. US Environmental Protection Agency	☐	☐	☐	☒
9. Other:	☐	☐	☐	☒

** Provide explanation of how agency comments were addressed and attach letters, memos, etc.:*

The Department has considered all comments provided by the PFBC, DCNR, PGC, and USFWS and concurs with the agencies' comments and recommendations. The Department has communicated with the applicant to minimize aquatic resource impacts to the extent practicable as well as overall earth disturbance and clearing, and ensure the project plans include the agencies' recommendations. The recommended avoidance measures would usually be incorporated as special conditions in Section H, below. However, the Department is recommending denial of this application, therefore no permit special conditions will be included.

*** If denied, provide response to agency recommendations:*

F. Environmental Review Committee	Yes	No
1. Reviewed by ERC?	☐	☒
2. Minutes attached?	☐	☒
3. Do minutes accurately reflect discussion?	☐	☒
4. Date Presented:_____		

G. SPECIAL CONDITIONS

1.

H. CASE-SPECIFIC SPECIAL CONDITIONS