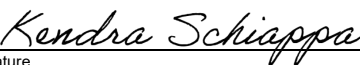




CHAPTER 105 ENVIRONMENTAL ASSESSMENT FORM

		Item Included Location
Note: The Department may waive a specific information requirement in writing, at the request of the Applicant, during the pre-application review process if the Department determines the information is not necessary to complete the review.		
Module S1: Project Summary		
<i>This module is intended to organize information in order to present an overall summary of the project scope, certain key information requirements and when applicable, a comprehensive view of the overall project and related projects.</i>		
A. Provide an overall project description and If the answer to the question below is YES , address CEA requirements; otherwise proceed to S1.B Comprehensive Environmental Assessment (CEA) when applicable. Answer the following question:	☒	Sec. 4
Does the "overall" project require more than one Ch. 105 permit in more than one county or will the project be completed in more than one phase?	☐ Yes ☒ No	
B. Provide information related to the project purpose, need, water dependency and summarize the amount and type of resources present and the temporary and permanent impacts proposed to those resources.	☒	Sec. 4
Module S2: Resource Identification and Characterization		
<i>This module is intended to organize information related to the identification of the resources present on the project site and to characterize those resources that may be affected by the proposed project.</i>		
A. Provide the standard resource identification information, location map, wetland determination or delineation reports; watercourse reports; identification and qualifications of preparers; location map, and answer the related questions.	☒	Sec. 4, A&B
Is the site located within or adjacent to any of the following; or within 100 feet of items vii or viii?		Fig. 4-2
i. National, state or local park, forest or recreation area	☒ Yes ☐ No	
ii. National natural landmark	☐ Yes ☒ No	
iii. National wildlife refuge, or Federal, state, local or private wildlife or plant sanctuaries	☐ Yes ☒ No	
iv. State Game Lands	☐ Yes ☒ No	
v. Areas identified as prime farmland	☒ Yes ☐ No	
vi. Source for a public water supply	☐ Yes ☒ No	
vii. A National Wild or Scenic River or the Commonwealth's Scenic Rivers System	☐ Yes ☒ No	
viii. Designated Federal wilderness area	☐ Yes ☒ No	
B. Identify all aquatic resources present on the project site and provide an identifier, the resource type; size of the resource(s); fishery designations, Ch. 93 uses and special protection status; and Exceptional Value (EV) wetland analysis.	☒	Sec. 4
C. Provide the following information related to habitat for Federal threatened and endangered (T&E) plant and animal species or State T&E species or species of special concern - copies of search forms or search receipts; identification of avoidance and minimization efforts taken to resolve identified conflicts.	☒	Sec. 4 App. C
Did the PNDI search or agency coordination identify any potential conflicts?	☒ Yes ☐ No	
If the above is answered YES ; answer the following two questions related to PNDI Coordination:		
a. Is the applicant utilizing a sequential review of the PNDI coordination?	☐ Yes ☒ No	
b. Is the applicant utilizing a concurrent review of the PNDI coordination?	☒ Yes ☐ No	
D. Characterize the aquatic resources: riverine, wetland and lacustrine present on the project site that are proposed to be directly or indirectly affected by the project. Including but not limited to the following, resource classification information, Level 2 rapid condition assessment results, discussion of resource functions, characterization of riparian properties and any other relevant information or studies conducted.	☒	Sec. 4 App. D
Module S3: Identification and Description of Potential Project Impacts		
<i>This module is intended to organize and present information concerning the potential impacts or effects of the proposed project in this application. Impacts related to the "over all" project that are proposed under related but separate application(s) should be addressed as part of the CEA Policy response under S1.A.</i>		
A. Provide a summary table of the proposed temporary and permanent direct and indirect impacts for each effected resource category (e.g. riverine, wetlands and lacustrine resources).	☒	Sec. 4
B. If any questions from S2.A Standard Information Response questions were answered YES, discuss in detail any potential impacts to those resource(s).	☒	Sec. 4
IMPORTANT NOTE: If either item vii or viii from S2.A is answered YES, the project is not eligible as a "Small Project Application" type. Complete all applicable sections of the EA form for the standard application type unless an item was otherwise waived by the Department in writing (see previous Note on waiving of information requirements).		

	Item	Location
C. Provide a table(s) of all proposed water obstruction(s), encroachment activities and dams (e.g. subfacility codes) and provide an identifier, the subfacility code and description, resource identifier from S2.B , latitude and longitude, the proposed temporary and permanent direct and indirect impacts and subfacility details.	☒	Sec. 4 Table 4-3
D. Provide a discussion of how the proposed subfacility(ies) individually and in combination directly and/or indirectly impact the identified resource(s) and the effects on the applicable resource functions: hydrologic, biogeochemical, habitat, recreation, any other environmental impacts and the effects on the property or riparian rights of owners upstream, downstream or adjacent to the project.	☒	Sec. 4
E. Antidegradation Analysis - The applicant should demonstrate consistency with State antidegradation requirements as described in the Water Quality Antidegradation Implementation Guidance Policy Document Number 391-0300-002. Project application information provided below in S3.F, G and H may be cross-referenced.	☒	Sec. 4
F. Alternatives Analysis - The scope and extent of this analysis should be commensurate with the size and scope of the proposed project impacts <i>in this</i> application, information provided in S4.A below, related to avoidance and minimization efforts, may be cross-referenced.	☒	Sec. 4 App. F
G. Potential Secondary Impact Evaluation - Identify and describe environmental impacts on adjacent land and water resources associated with but not that direct result of the project.	☒	Sec. 4
H. Identify and evaluate the potential cumulative environmental impacts of this project and other potential or existing projects like it, and the impacts that may result through numerous piecemeal changes to the wetland resource.	☒	Sec. 4
Module S4: Mitigation Plan		
<i>This module is intended to organize and present information concerning actions undertaken in accordance with the definition of Mitigation in Title 25 Pa. Code Chapter 105 - §105.1, 105.16, 105.18a(a)(3), 105.18a(b)(7), 105.20a, and 105.21 as related to the potential impacts or effects of the proposed project <i>in this</i> application.</i>		
A. Identify and discuss any measures taken that resulted in avoiding or minimizing unavoidable resource impacts, provide detailed responses for individual proposed impact area(s) and the project as a whole.	☒	Sec. 4
B. Identify and discuss any repair, rehabilitation or restorative actions taken to rectify an impacted resource, provide detailed responses for individual proposed impact area(s) and the project as a whole. Identify and discuss any proposed preservation and maintenance operations that will be taken to reduce or eliminate an impact during the life of the project.	☒	Sec. 4
C. Provide the results from application of the Pennsylvania Function-Based Aquatic Resource Compensation Protocol. Identify and discuss any actions undertaken to provide compensatory mitigation, a detailed discussion of the proposed compensation actions and how they will offset the lost resource functions, include a comparison of the results from Section 6.0 of the Pennsylvania Function-Based Aquatic Resource Compensation Protocol with the results from Section 5.0. When applicable provide detailed plans including performance standards and success criteria.	☐	N/A
Answer the following question. If the answer to the question is YES , provide the information regarding the mitigation credit provider; otherwise provide a detailed mitigation plan. If the application proposes to utilize both mitigation bank or in lieu fee credits and conduct permittee responsible mitigation; both the credit provider and mitigation plan information shall be submitted.	☒	Sec. 4, App E
Does the applicant propose to utilize an approved mitigation bank or PA's in lieu fee program to provide all or a portion of the compensation?	☒ Yes ☐ No	
D. When applicable, provide a plan to monitor the identified actions proposed in S4.B and/or S4.C compensatory mitigation area. Applicants should utilize the Department's Design Criteria and the USACE's RGL 08-03 -(http://www.usace.army.mil/Portals/2/docs/civilworks/RGLS/rgl08_03.pdf) to develop monitoring plans for compensatory mitigation proposals. The plan should include performance standards/success criteria, duration and timeframes of monitoring, monitoring report template, and template remedial action or adaptive management plan.	☐	N/A
Note: All or portions of this Module likely apply to "Small Project" type applications and waiver of this section should be discussed during any pre-application meetings or prior to application submittal.		
CERTIFICATION		
I certify that the above statements, attachments including those labeled and identified as Enclosures, and all conclusions are true, correct, and based upon current environmental principles and science, to the best of my knowledge and belief.		
	8/18/2026	
Signature	Date	

MODULE S1: PROJECT SUMMARY

S1.A Project Description

Pennsylvania General Energy Co., LLC (PGE)'s Saluda Access Road and Staging Area project is located in Gamble and Cascade Townships, Lycoming County, Pennsylvania (Figure 4-1) with most of the limits of disturbance (LOD) located within Loyalsock State Forest. The proposed project includes the construction of a 3.9-mile-long permanent access road and staging area. The proposed access road will provide access to an existing well pad and future well pads proposed on the state forest tract. The proposed staging area will be used to store equipment and materials for the construction of future well pads and will later be used as a well pad for natural gas extraction. The proposed limit of disturbance is approximately 44.3 acres. Project activities will include tree clearing, filling, grading, and installation of erosion and sediment (E&S) best management practices (BMPs) and post-construction restoration of disturbed areas. The permanent access road will be gravel except for a half-mile section that will be paved.

S1.B Project Purpose, Need, Water Dependency, and Impact Statement

PGE's overall plan is to produce natural gas from Tracts 723 and 724. The proposed access road project is the first step in the development; additional pads, a pipeline to transfer gas off these tracts, as well as a waterline will be permitted separately (see Module S3.H for information on cumulative impacts). As shown on the development map (Appendix F; Figure 1), two additional pads are situated to the east of the staging area; access to these pads will use an existing road which veers off the main access road to provide access to pad locations to the east.

PGE has previously utilized Butternut Grove Road for access to the existing COP Tract 724 Pad A 2411 for construction and drilling/completions operations. There are two producing wells on this pad, well #2752 (API #37-081-21658) and well #2411 (API #37-081-20208). Currently, the produced gas from these wells is trucked out once per year.

The truck use that existed for previous development (using Butternut Grove Road) to this pad was minimal in comparison to the proposed heavy truck use that will be necessary for the development of the Saluda tracts. Previous development required roughly 550 truckloads for the drilling and completions on COP Tract 724 Pad A 2411. In just the drilling and completions phase of the new development, PGE is expecting over 80,000 truckloads for all pads.

In addition, as compared to previous development, larger trucks are now needed to support drilling activities. The new development will require a larger rig than previously used because of the deeper measured depths of the wells and the probability of extending the northern wells to even deeper measured depths. The rig has extra mud pumps and generators as compared to the prior rig. It also has a higher mast rating to allow it to pull more. As such, many of the rig loads are larger than the previous rig that was used on COP Tract 724 Pad A 2411. For these reasons, access which can accommodate the higher traffic volume and larger rig is necessary for PGE's future planned buildout for the extraction of natural gas from Tracts 723 and 724. Additional discussion about why Butternut Grove Road could not be used for access to Tracts 723 and 724 is provided in Module S3.F(2)(b) under Location Alternatives.

SI.B(2) Water Dependency Statement

This project is water dependent because the access road cannot be constructed to access the staging area (future Pad C) or other future proposed pads without crossing streams. Due to the long linear nature of streams and the linear nature of the project, avoidance is not possible. Stream crossings are necessary to accomplish the project purpose.

SI.B(3) Summary of Resources Present

Forty-nine (49) wetlands and seventy-nine (79) streams were identified within the wetland and stream delineation area of interest (AOI).

Tables 2 and 3 of the Waters Delineation Report (Appendix A) list each resource identified within the delineation AOI and provide designations and characteristics of each resource. For further information regarding the project's wetlands and streams, please refer to the Waters Delineation Report and associated addendum.

SI.B(4) Proposed Permanent and Temporary Impacts

The staging area was designed to avoid aquatic resources; however, avoidance by the access road was not possible due to the water dependent nature of the project. Where avoidance was not possible, impacts to aquatic resources were minimized to the extent practicable. The proposed impacts are summarized in Tables 4-1 and 4-2. Refer to the Site-Specific Drawings included in Appendix B of this Joint Permit Application (JPA) package for plan views and profiles of each proposed crossing.

The proposed project activities would require 0.048 acre of permanent direct impacts and 0.082 acre of temporary direct impacts to wetlands, 0.069 acre of permanent direct impacts and 0.173 acre of temporary direct impacts to streams, and 1.975 acres of permanent direct impacts and 3.115 acres of temporary direct impacts to floodways. No permanent indirect or temporary indirect impacts are anticipated.

MODULE S2: RESOURCE IDENTIFICATION AND CHARACTERIZATION

S2.A Resource Identification Information

S2.A(1) Professional Qualifications

Lexy Mears, Josh Reffner, David Jackson and Justin Theodorakos (employees of Civil & Environmental Consultants, Inc. (CEC)) led the wetland and stream delineation fieldwork. Peter Staudenmeier, David Jackson, and Justin Theodorakos also conducted quality assurance checks of the wetland and stream delineations in the field. Matt Bricker, Josh Reffner, and Peter Staudenmeier of CEC completed the Waters Delineation Report and associated addendum (Appendix A). Resumes detailing professional qualifications are included in Appendix B of this report. For questions or information regarding the fieldwork or report, please contact the following:

Peter Staudenmeier, Vice President
Civil & Environmental Consultants, Inc.
700 Cherrington Parkway
Moon Township, PA 15108
(412) 429-2324
pstaudenmeier@cecinc.com

CEC ecologists conducted waters delineations on August 21 - 24, 2023, October 17 - 18, 2023, April 29 - 30, 2025, June 5 - 6, 2025, and November 18, 2025. A copy of the Waters Delineation Report and association addendum are included in Appendix A of this report.

S2.A(3) Resource Identification Map

Items (ii) through (viii) are not located within the project LOD or within 100 feet of the project limits. Item (i), Loyalsock State Forest, is located within the project LOD. Refer to Figure 4-2 for the Resource Identification Map.

S2.B Summary of Resources Present

Forty-nine (49) wetlands and seventy-nine (79) streams were identified within the wetland and stream delineation AOI.

Tables 2 and 3 of the Waters Delineation Report (Appendix A) list each resource identified within the delineation AOI and provide designations and characteristics of each resource. For further information regarding the project's wetlands and streams, please refer to the Waters Delineation Report and associated addendum.

S2.C Federal and State Threatened and Endangered Species Habitat

PGE obtained a preliminary PNDI receipt (Project Search ID: PNDI-792055) for the Saluda Access Road and Staging Area project on August 3, 2023. The receipt resulted in:

- a conservation measure from the Pennsylvania Game Commission (PGC) requiring no further review,
- potential impacts to mountain bugbane (*Actaea podocarpa*) and herbaceous vernal pond habitat requiring additional review by the Department of Conservation and Natural Resources (DCNR),
- potential impacts to an unnamed sensitive species requiring additional review by the Pennsylvania Fish and Boat Commission (PFBC), and
- potential impacts to federally listed species requiring consultation with the U.S. Fish and Wildlife Service (USFWS) via the Information for Planning and Consultation (IPaC) tool.

Consultation was initiated with DCNR in August of 2023 under PNDI-792055. However, CEC obtained a new PNDI receipt (Project Search ID: PNDI-841801 [Appendix C]) for the project on August 6, 2025. The results of the new PNDI were unchanged except for the DCNR's response which included a conservation measure to limit adverse impacts to "the plant community of concern" and indicated that no further review was required.

Consultation with all four jurisdictional agencies is complete. The following is a summary of the conservation measures recommended by each agency.

S2.C(1) Pennsylvania Game Commission

As part of its conservation measure, PGC deferred jurisdiction to USFWS, and did not require further review. However, during a mist net survey completed as part of the federal consultation, two state-listed little brown bats (*Myotis lucifugus*) were captured. On November 13, 2025, PGC issued a clearance letter with conservation measures, which PGE intends to follow. The PGC clearance letter is provided in Appendix C.

PGE plans to implement the following conservation measures, as requested by PGC.

Conservation Measures for Little Brown Bat:

- 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 will be cut between November 16th and March 31st as much as practical, and for portions of the project where that is not feasible, PGE will attempt to avoid cutting during the maternity season for federally listed bats, May 15th to July 31st.
- Prior to commencing work to replace the bridge over Wallis Run at approximately 41.414277° N, 76.868075° W, PGE will hire a qualified consultant to conduct a wildlife survey in accordance with Appendix K of the USFWS Range-wide Indiana Bat and Northern Long-eared Bat Survey Guidelines, and PGE will report to PGC Environmental Review if birds, bats, and/or other wildlife are using this bridge.

Conservation Measures for Forest Bird Species:

- PGE plans to co-locate future pipelines and associated facilities with existing roads and other disturbed areas to the extent possible.
- PGE minimized the width of the access road and temporary construction workspaces and will avoid grubbing where possible to encourage the re-establishment of woody vegetation.

Please refer to Module S3.F of the Environmental Assessment for the Alternatives Analysis which details impact minimization. This includes a discussion about special stormwater control measures (SCMs) approved for use on State Forest Lands which significantly reduce tree clearing along the proposed access road corridor while maintaining compliance with the Pennsylvania Department of Environmental Protection's (PADEP) post construction stormwater management requirements.

- Maintenance along the access road right-of-way will be limited to mowing herbaceous vegetation along the road edge and trimming overhanging woody vegetation to maintain a safe roadway. Mowing and trimming will occur between August 15th and April 15th to the extent possible.
- PGE will use a seed mix prescribed by DCNR which includes native wildflowers and native warm season grasses. The seed mix is specially formulated to increase ecological value by attracting pollinators and other insects which then builds a more diverse food web and provides additional food sources for wildlife, such as forest bird species. Plantings of native warm season grasses allow for natural succession, which over time will limit the establishment of invasive plant species. Please refer to Detail 3 on Sheet C921 of the Erosion and Sediment Control Plans for the formulation of this seed mix.

S2.C(2) Pennsylvania Department of Conservation of Natural Resources

In August 2023, CEC initiated consultation with DCNR based on the results of PNDI-792055. On August 16, 2023, DCNR requested a botanical survey to determine if mountain bugbane (*Actaea podocarpa*) and great-spurred violet (*Viola selkirkii*) were present within the project area. DCNR also requested the delineation of herbaceous vernal pond habitat. CEC conducted a botanical survey from August 21 through 23, 2023 and identified what was thought to be a population of great-spurred violet, although flowers were not present at the time of the survey. Mountain bugbane was not identified. Several herbaceous vernal ponds were identified and delineated within the search area.

During an April 11, 2025 meeting with DCNR, DCNR requested a supplemental botanical survey for great-spurred violet and mountain bugbane during the violet's historical flowering period. In

response to this request, CEC conducted a supplemental botanical survey April 28 and 29, 2025. During this follow-up field visit, CEC did not identify great-spurred violet or mountain bugbane.

CEC prepared a report on June 2, 2025 summarizing the findings of the botanical survey and habitat assessment. The report was submitted to DCNR under PNDI-841801. DCNR responded on August 28, 2025, citing the original PNDI number 792055, with a determination of “No Impact Anticipated per Survey with Avoidance Measure”. The Avoidance Measure limited work to when the ground is frozen (i.e., November through January) and during the drier summer months (i.e., July through August). However, the standard avoidance measure for herbaceous vernal pond habitat does not include a work restriction.

PGE requested clarification from DCNR regarding the seasonal work restriction to determine which areas of the project this restriction applies. DCNR requested additional information on the herbaceous vernal pond habitat and proposed access road construction for its review. DCNR consulted its wildlife biologist and the Loyalsock State Forest District office as part of its review. In response to PGE’s request, DCNR provided a revised clearance letter with revised avoidance measures on October 28, 2025.

PGE intends to implement the following conservation measures as recommended by DCNR in the October 28 letter.

Avoidance Measures:

- During construction, high visibility fencing will be installed along the LOD in the vicinity of pools 6-1, 6-2, and 6-3 to avoid impacts. Erosion and sediment controls will be in place to avoid sedimentation of the pools, which includes 16-inch siltron fence along the LOD of the access road in the vicinity of these vernal pools. Vernal pools 6-1, 6-2, and 6-3 and the associated fencing can be found on Drawing No. C911. High visibility fencing (orange construction fence) is included as Detail 4 on Drawing No. C921 and Siltron silt fence detail is included as Detail 6 on Drawing No. C922.

- Four wildlife passages will be installed within the 1,000-foot buffer of vernal pools. Three of the wildlife passages will be pre-fabricated bridges installed at stream crossings within the 1,000-foot vernal pool buffer. The fourth wildlife passage will be a proposed steel grate over a broad based dip. Additional silt fence will be installed in order to lead amphibians to the wildlife passages. The wildlife passages are identified on the plan sheets. Wildlife passage #1 can be found at approximately station 171+00 on Drawing No. C916; Wildlife passage #2 can be found at approximately station 139+00 on Drawing No. C914; Wildlife passage #3 can be found at approximately station 135+00 on Drawing No. C913; and Wildlife passage #4 can be found at approximately station 107+00 on Drawing No. C911. In addition, a wildlife passage detail has been provided as Detail 27B on Drawing No. C926A.
- The 2010 vernal pool locations provided by the DCNR are shown on the Erosion & Sediment Control Plans in Appendix B of the JPA.
- Specifications for fencing are included on the project plans. Please refer to Drawing No. C911 for fencing layout/locations and Drawing Nos. C921 and C922 for associated fencing details (Details 4 and 6).

Conservation Measures:

- Construction activities will be halted during the spring amphibian breeding season (February to May) within a 300-foot buffer around the vernal pools.
- Protective fencing will be removed in the vicinity of pools 6-1, 6-2 and 6-3 during the spring amphibian breeding season.
- Wildlife passage features will be installed within a 1,000-foot buffer of the vernal pools. Please see the Wildlife Passage Feature map (Appendix C) which shows the buffer areas and the locations of these wildlife passage features. The Wildlife Passages can also be found at approximately Stations 107+00, 135+00, 139+00, and 171+00 on the plan drawings in Appendix B of the JPA. Cross sections of the proposed Wildlife Passages can be found on Drawing Nos. C404 and C405, and the supporting Wildlife Passage Detail (Detail 27B) can be found on Drawing No. C926A of the revised plans set. PGE has worked

with the DCNR on the locations of these features, and they have been approved. Additional fencing areas have been included in the plan sheets, along with a wildlife crossing detail.

The botanical report and DCNR clearance letters are provided in Appendix C.

S2.C(3) Pennsylvania Fish and Boat Commission

On August 6, 2025, CEC requested PFBC's review of the project to determine if the proposed activities would impact protected species under its jurisdiction. PFBC responded on August 8, 2025 (Species Impact Review [SIR] #61880) requesting that a timber rattlesnake habitat assessment be conducted due to the project's proximity to known critical habitat for the species. PGE contracted EnviroScience, Inc. to conduct the habitat assessment, which occurred the week of September 15. EnviroScience identified suitable denning and gestation habitat. Denning habitat will be avoided by the project, but gestation habitat will be impacted (see Drawing No. C918). On November 4, 2025, PFBC issued a clearance letter with recommended actions to minimize impacts to timber rattlesnake during construction.

The PFBC recommended that any impacted timber rattlesnake gestation habitat be replaced and/or recreated in accordance with the PFBC Guidelines for Timber Rattlesnake Habitat Creation. PGE has consulted with Philip Dunning, an approved Timber Rattlesnake Biologist with WHM Group, LLC, who will be responsible for timber rattlesnake monitoring and for the creation of gestation/basking habitat associated with the project.

Based on a review of the habitat assessment and presence/absence survey report, Potential Gestation Habitat Areas (PGH) 02, 03, 05, and 08 (Appendix C; Figure 3.01) are proposed to be impacted by the project, and PGH-04 (Appendix C; Figure 3.01) is located in very close proximity to the LOD. At a minimum, PGE proposes to create replacement gestation/basking habitat in close proximity to the impacted habitat areas, along the edge of the existing COP Tract 724 Pad A 2411.

During construction of the proposed access road and staging area, the approved Timber Rattlesnake Monitor will be onsite. Suitable large slab rocks encountered during construction (minimum dimensions of 4 feet by 6 feet) will be set aside or stockpiled for later use in habitat

creation. The proposed habitat will be located on the north or east side of the COP Tract 724 Pad A 2411 opening, approximately 5 to 10 yards into the opening from the existing tree line. Prior to placement of slab rock for the gestation habitat, the approved Timber Rattlesnake Biologist will consult with PFBC or conduct an onsite meeting to confirm final habitat placement. The habitat creation area(s) will be documented in the annual monitoring report, including representative photographs and GPS coordinates.

The habitat presence/absence survey report and PFBC clearance letter are included in Appendix C.

S2.C(4) U.S. Fish and Wildlife Service

On July 23, 2025, CEC used the IPaC tool (Project Code: 2025-0117338) to obtain an official list of federally listed species that may occur within the project area. These species included northern long-eared bat (*Myotis spetentrionalis*), tricolored bat (*Perimyotis subflavus*), and northeastern bulrush (*Scirpus ancistrochaetus*). It also included monarch butterfly (*Danaus plexippus*), which is proposed to be listed, but not yet federally protected. CEC then began completing the Rangewide Northern Long-eared Bat and Tricolored Bat Determination key (DKey) which required a hibernacula survey due to the presence of rock outcrops in the project area. CEC also completed the Northeast DKey for the project which covers all other federally listed species in Pennsylvania. The Northeast DKey resulted in a determination of “No Effect” to northeastern bulrush.

PGE contracted Keystone Ecological Services, LLC (KES) to conduct the hibernacula survey and a bat mist net survey to determine if northern long-eared bat or tricolored bat were present within the project boundary. The hibernacula survey identified no suitable hibernacula. During the mist net survey, two northern long-eared bats were captured. One of the bats was tracked to a mature roost tree while the other was never located after seven days of tracking. KES completed a Bat Habitat Assessment Report detailing the findings of the hibernacula survey and a Bat Mist Net Survey Report detailing the findings of the mist net survey and tracking the two captured northern-long eared bats.

Using the results of the Bat Habitat Assessment Report and Bat Mist Net Survey Report, CEC completed the Northern Long-eared Bat and Tricolored Bat Range-wide Dkey. Based on the project activities and report findings, IPaC resulted in a “May Effect” determination for the northern long-eared and tricolored bats; requiring direct coordination with the USFWS Pennsylvania Field Office.

PGE initiated coordination with USFWS Biologist Richard A. Novak at the Pennsylvania Field Office. At USFWS’s request, KES prepared an effects determination for northern long-eared bat. KES determined that the project was “Not Likely to Adversely Affect” northern long-eared bat with avoidance of the identified roost tree and limiting clearing to outside of the pup season. USFWS concurred with KES’s determination and recommended avoiding timber clearing from November 15th through March 31st as much as practical and avoiding timber clearing during the maternity season (May 15th through July 31st). However, PGE will follow the seasonal clearing restrictions listed under the PGC restrictions as this is the limiting provision for tree removal for the project. USFWS stated that no additional coordination with its office is necessary.

The USFWS official species list and technical assistance letters, KES Bat Habitat Assessment and Bat Mist Net Survey Reports, KES effects determination, and USFWS concurrence email are included in Appendix C.

S2.D Resource Characterization

S2.D(1) Riverine Resources

Of the seventy-nine (79) watercourses identified onsite, seventy-eight (78) would be considered high gradients headwater streams. One (1) stream, S-20230821-1148-JT (Wallis Run), was identified as a moderate gradient mid-reach stream. Five (5) perennial streams totaling 5,083 linear feet, fifty-four (54) intermittent streams totaling 11,919 linear feet, and twenty-one (21) ephemeral streams totaling 4,884 linear feet were delineated within AOI. One stream included both intermittent and ephemeral reaches. Most of the streams within the AOI were buffered by second growth mixed deciduous and coniferous forests. A limited number of stream buffers included wetlands, existing forested roads, scrub shrub and meadows.

Level 2 Rapid Assessments were completed for the following streams since they are crossed by the waterline. Refer to Appendix D for the Riverine Assessment Forms and maps.

- The overall condition index score for Stream S-20230821-0005-DJ is 0.84. This stream had riparian buffers comprised of deciduous forest on both banks. No apparent channel alterations were observed.
- The overall condition index score for Stream S-20230821-1148 -JT is 0.58. This stream had riparian buffers comprised of deciduous forests, wetlands, an existing forest road, and maintained/open fields. No apparent channel alterations were observed.
- The overall condition index score for Stream S-20230821-1402-JT is 0.65. This stream had riparian buffers comprised of deciduous forest, wetlands and an existing forest road. No apparent channel alterations were observed.
- The overall condition index score for Stream S-20230822-0014-DJ is 0.72. This stream had riparian buffers comprised of deciduous forest. No apparent channel alterations were observed.
- The overall condition index score for Stream S-20230822-1725-JR is 0.72. This stream had riparian buffers comprised of deciduous forest. No apparent channel alterations were observed.
- The overall condition index score for Stream S-20230822-1301-JT is 0.83. This stream had riparian buffers comprised of deciduous forest, wetlands and an existing forest road. The scoring is representative of S-20230822-1301-JT and its tributaries. No apparent channel alterations were observed.
- The overall condition index score for Stream S-20230823-1117-JT is 0.90. This stream had riparian buffers comprised of deciduous forest and an existing forest road. No apparent channel alterations were observed.
- The overall condition index score for Stream S-20230823-1433-JT is 0.85. This stream had riparian buffers comprised of deciduous forest and an existing forest road. apparent channel alterations were observed.
- The overall condition index score for Stream S-20230824-1304-JT is 0.84. This stream had riparian buffers comprised of deciduous forest. No apparent channel alterations were observed.

- The overall condition index score for Stream S-20230824-1305-DJ is 0.84. This stream had riparian buffers comprised of deciduous forest. No apparent channel alterations were observed.
- The overall condition index score for Stream S-20230824-1355-DJ is 0.84. This stream had riparian buffers comprised of deciduous forest. No apparent channel alterations were observed.
- The overall condition index score for Stream S-20230822-1301-JT is 0.83. This stream had riparian buffers comprised of deciduous forest, wetlands and an existing forest road. No apparent channel alterations were observed. Streams S-20230822-1015-JT, S-20230822-1412-JT, S-20230822-1218-JT, S-20230823-1150-JT, S-20230822-1243-JT, S-20230823-1225-JT, S-20230823-1240-JT, and S-20230823-1338-JT are all tributaries of S-20230822-1301-JT. As such, they are in the Zone of Influence of Stream S-20230822-1301-JT and, therefore, the overall condition index score for S-20230822-1301-JT is representative of these tributaries.

S2.D(1)(a) Hydrologic Functions

First order headwater streams within the AOI had similar drainage areas, streamflow, and gradient, which result in similar hydrologic attributes. Headwater streams also had similar riffle patterns and are expected to flush quickly after storm events. Ephemeral and intermittent streams will typically flow during and directly after storm events and during times of elevated water table levels. Many of these streams had relatively narrow channels and are expected to have little capability to provide flood water control and storage during storm events. High gradients channels have reduced rate of groundwater recharge due to higher flow velocity.

Second and third order, high gradient, intermittent and small perennial streams that transect the AOI had similar drainage areas, streamflow and slopes which result in these streams having similar hydrological attributes. These streams are high gradient, have well-defined channels, and are not expected to flush as quickly as first order streams after rain events. These streams have some ability to perform the function of storm and floodwater storage and control and provide limited groundwater recharge.

Wallis Run has a moderate gradient, a well-defined channel, and had a relatively broad floodplain. The stream is expected to flush relatively quickly after rain events, but the broader floodplain allows it to provide a moderate level of storm and floodwater storage and control. The unforested floodplain will have a reduced recharge rate as compared to a forested floodplain. As a perennial stream, it's likely to provide groundwater recharge through the stream bed.

S2.D(1)(b) Biogeochemical

The first order headwater streams had small drainage areas and low streamflow. As such, these streams have a limited potential to prevent pollution by trapping sediments, removing and burying metals and other toxic compounds, and enhancing biological transformation and degradation of nutrients and organic pollutants. These streams were mostly buffed by forested areas with some streams buffered by meadows, shrub land, and wetlands, which have limited potential to input sediment and nutrient loads. Some streams intersect and parallel an existing forest road that may provide moderate potential to input sediment and nutrient loads

Second and third order, high gradient, intermittent and small perennial streams that intersect the AOI had small drainage areas, high gradients, moderate stream flow, and narrow channels. As such, these streams have low to moderate potential to prevent pollution by trapping sediments, removing and burying metals and other toxic compounds, and enhancing biological transformation and degradation of nutrients and organic pollutants. These streams were mostly buffed by forested areas with some streams buffered by meadows, shrub land, and wetlands, which have limited potential to input sediment and nutrient loads. Some streams intersect or parallel existing forest roads that may provide moderate potential to input sediment and nutrient loads

Wallis Run had a moderate gradient, moderate channel width, and a relatively broad floodplain. As such, this stream has moderate potential to prevent pollution by trapping sediments, removing and burying metals and other toxic compounds, and enhancing biological transformation and degradation of nutrients and organic pollutants. Within the LOD, the stream is buffered by forest, scrub shrub, and meadows, which have limited potential to input sediment and nutrient loads.

S2.D(1)(c) Habitat attributes

The intermittent and ephemeral streams had low habitat attributes. These streams exhibited few to no invertebrate species and low functionality for food chain production. It is unlikely that they provide functional nesting, spawning, or rearing habitat due to their small size and low flow volume throughout the year. The intermittent streams with forested or partially forested riparian buffers may result in a moderate functional value for migratory bird species, and the streams may provide incidental stopping points for songbird migration.

High-gradient perennial streams typically have continuous water flow throughout most of the year. These streams were mostly buffered by forests, shrub and wetlands areas; therefore, it is expected that these streams would have moderate functionality for food chain production, nesting, spawning, and rearing capabilities. Due to these stream's forested riparian buffers, it is likely that they provide moderate functional habitat for migratory bird species.

The Loyalsock Creek Basin from the Sullivan-Lycoming County border to Mill Creek (East), which includes Wallis Run, Bar Bottom Hollow, and Jacoby Hollow, has a Designated Use classification of High-Quality, Cold Water Fishes (HQ-CWF) and Migratory Fishes (MF) per 25 Pa. Code § 93, which means that these streams meet the water quality standards set forth to support aquatic communities that require high-quality, cold water habitat. However, this same basin has a separate Existing Use classification of Exceptional Value (EV), which means that there is data to support that streams within this basin meet the highest water quality standards in the state.

PFBC classifies Wallis Run, Bar Bottom Hollow, and Jacoby Hollow as streams supporting natural trout reproduction (a.k.a. wild trout). Per 58 Pa. Code § 57.11(b)(4), tributaries to these streams are also classified as wild trout streams for their function as habitat for wild trout populations, including nurseries and refuges, and in sustaining water quality necessary for wild trout. Additionally, Bar Bottom Hollow is designated a Class A wild trout stream; a designation for streams that support a population of naturally produced trout of sufficient size and abundance to support a long-term and rewarding sport fishery.

S2.D(1)(d) Recreation

Most of the project area is located within Loyalsock State Forest. Loyalsock State Forest provides numerous outdoor recreational opportunities. No DCNR mapped hiking trails (Appendix F; Figure 6) or camping areas (reference: <https://pennsylvaniastateparks.reserveamerica.com/>) are located within the project area. A comment had been raised about a trail leading from the top of the hill down to Jacoby Falls. PGE confirmed with DCNR that no maintained trails are located within this area. PGE also conducted its own site visit and found no trails to exist leading down the hill to Jacoby Falls Trail. The nearest DCNR hiking trail is the Jacoby Falls Trail which is approximately 0.25 miles west of the project area. Only gated DCNR administrative roads were identified within the LOD. Direct impacts are not proposed to Jacoby Hollow or Bar Bottom Hollow, a Class A wild trout stream, but impacts to unnamed tributaries are proposed. Direct Impacts are proposed to Wallis Run and its unnamed tributaries as well. Wallis Run occurs on private property within the project area, and an existing bridge is proposed to be replaced at the access road crossing. The bridge will not require instream work, is designed based on PADEP requirements, and will not impede fish movement within Wallis Run (Refer to Site-specific Drawing SC01). Bottomless culverts or bridges are proposed for all stream crossings to maintain the natural stream gradient. PGE plans to follow conservation measures and permit conditions regarding instream work on wild trout streams.

S2.D(1)(e) Upstream and Downstream Property

The properties surrounding the project consist of second growth forest, wetlands, streams, existing natural gas infrastructure and small pockets of agricultural areas. The proposed work will likely have no effect on upstream or downstream properties due to the temporary nature of the construction activities. Additionally, E&S BMPs (see Appendix B of the JPA) will be implemented to control sediment during construction to protect against sedimentation to downstream properties.

S2.D(2) Wetland Resources

Forty-nine (49) wetlands were identified within the project AOI, of which twenty-eight (28) wetlands were classified as palustrine emergent (PEM), four (4) wetlands were classified as palustrine forested (PFO), two (2) wetlands were classified as PEM and PFO, two (2) wetlands were classified as PEM and palustrine scrub/shrub (PSS), and thirteen (13) wetlands were

classified as herbaceous vernal ponds. In total, 3.642 acres of wetlands were delineated within the AOI, comprised of 0.735 acre of PEM, 0.049 acre of PSS, 1.840 acres of PFO, and 1.018 acres of herbaceous vernal pond. Wetlands were classified using the Hydrogeomorphic Wetland Classification and Palustrine Plant Community classification system. Vernal ponds were classified according to *Terrestrial and Palustrine Plant Communities of Pennsylvania*. Wetland and vernal pond classifications are provided in Table 2 of the Waters Delineation Report in Appendix A of this report.

Level 2 Rapid Assessments were completed for the wetlands proposed to be impacted by the project. These wetlands consisted of the following HGM classes: topographic slope mineral soil (SLtn), stratigraphic slope mineral soil (SLn), depression human impounded (DPH), riverine headwater complex (R3c), and riverine floodplain complex (R2c). Refer to Appendix D for the Wetland Condition Assessment Forms and mapping.

- The overall condition index score for Wetlands W-20230822-1025-JT, W-20230822-1345-JT, and W-20230822-1600-JT is 0.80. These wetlands were bordered by forest, intermittent and perennial streams and an existing forest road. The hydrology of AA-Wetlands W-20230822-1025-JT, AA-W-20230822-1345-JT, and AA-W-20230822-1600-JT appeared to be disturbed by the existing roadbed.
- The overall condition index score for Wetlands W-20230821-1157-JT and W-20230821-1247-JT are 0.60. These wetlands were bordered by forest and Wallis Run (Stream: S-20230821-1148-JT). The hydrology of AA-Wetlands W-20230821-1157-JT and AA-W-20230821-1247-JT appeared to be disturbed by the existing roadbed.
- The overall condition index score for Wetlands W-20230821-1334-JT, W-20230821-1425-JT, and W-20230821-1417-JT is 0.66. These wetlands were bordered by forest and abutted an existing forest road. These wetlands abutted perennial and intermittent streams. The hydrology of AA-Wetlands W-20230821-1334-JT, W-20230821-1425-JT, and W-20230821-1417-JT appeared to be disturbed by the existing roadbed.
- The overall condition index score for Wetland W-20231017-1503-JR is 0.77. The wetland was bordered by forest and an existing forest road. The hydrology of AA-W-20231017-1503-JR appeared to be disturbed by the existing roadbed.

S2.D(2)(a) Hydrologic Functions

Wetland W-20230822-1025-JT appeared to be an R3c, SLn wetland originating on a forested hillslope at a ground water source and intermittent stream. Wetlands W-20230822-1345-JT and W-20230822-1600-JT appeared to be R3c, SLn wetlands associated with an upper perennial stream. W-20230822-1025-JT abutted the existing roadbed which appeared to influence wetland hydrology by impeding natural runoff and hydrologic function. W-20230822-1025-JT appeared to contribute some hydrology to abutting intermittent streams and provides minimal hydrological recharge and stormwater control. Similar to wetland W-20230822-1025-JT, wetlands W-20230822-1345-JT and W-20230822-1600-JT appear to contribute some hydrology to an abutting perennial stream and provide minimal hydrological recharge and stormwater control. W-20230822-1600-JT also abutted the existing roadbed which appeared to influence wetland hydrology by impeding natural runoff and hydrologic function

Wetland W-20230821-1157-JT exhibit characteristics of R2c and SLt wetlands within the forested floodplain of Wallis Run. Both wetlands abutted the existing roadbed which appeared to influence wetland hydrology by impeding natural runoff and hydrologic function. The wetlands appeared to contribute some hydrology to Wallis Run and provide minimal hydrological recharge and stormwater control.

Wetlands W-20230822-1025-JT, W-20230822-1345-JT, and W-20230822-1600-JT exhibited R3c, SLn characteristics and are located on a forested hillslope along a perennial stream. The wetlands abutted an existing roadbed that appeared to influence hydrology by impounding runoff and intermittent stream flow. The wetlands appeared to contribute some hydrology to abutting intermittent streams and provide minimal hydrologic recharge and stormwater control.

Wetland W-20231017-1503-JR exhibits DPh characteristics as it appeared to be an excavated depression along an existing road. The wetland was adjacent to a perennial stream but likely does not contribute to the stream hydrology and provides minimal hydrologic recharge and stormwater control.

S2.D(2)(b) Biogeochemical

Wetlands W-20230822-1025-JT, W-20230822-1345-JT, and W-20230822-1600-JT were small, sloped, moderately vegetated wetlands that abutted intermittent and perennial streams. They likely have low potential to prevent pollution by trapping sediments, removing and burying metals and other toxic compounds, and enhancing biological transformation and degradation of nutrients and organic pollutants.

Wetland W-20230821-1157-JT was a medium, depressional, well vegetated wetlands within the floodplain of Wallis Run. They likely have low to moderate potential to prevent pollution by trapping sediments, removing and burying metals and other toxic compounds, and enhancing biological transformation and degradation of nutrients and organic pollutants.

Wetlands W-20230821-1334-JT, W-20230821-1425-JT, and W-20230821-1417-JT were medium, low gradient, depressional, well vegetated wetlands that abutted intermittent streams. They likely have low to moderate potential to prevent pollution by trapping sediments, removing and burying metals and other toxic compounds, and enhancing biological transformation and degradation of nutrients and organic pollutants.

Wetland W-20231017-1503-JR was a depressional, sloped, moderately vegetated wetland. It likely has low to moderate potential to prevent pollution by trapping sediments, removing and burying metals and other toxic compounds, and enhancing biological transformation and degradation of nutrients and organic pollutants.

S2.D(2)(c) Habitat attributes

Wetlands W-20230822-1025-JT, W-20230822-1345-JT, and W-20230822-1600-JT were located on a forested hillslope and abutted perennial and intermittent streams and an existing forest road. The wetlands were small and had limited horizontal interspersions, microtopography, seed producing plant species and diverse cover habitat were observed. For these reasons, these wetlands have low value for food chain production and migration support, and low value for nesting, spawning, and rearing.

Wetland W-20230821-1157-JT was located on a forested floodplain and abutted an existing roadbed. The wetlands were small and had limited horizontal interspersion, microtopography, seed producing plant species and diverse cover habitat was observed. For these reasons, these wetlands have low value for food chain production and migration support, and low value for nesting, spawning, and rearing.

Wetlands W-20230821-1334-JT, W-20230821-1425-JT, and W-20230821-1417-JT were located on a forested hillslope and abutted an existing roadbed. The wetlands were medium size and had limited horizontal interspersion, microtopography, seed producing plant species and diverse cover habitat were observed. For these reasons, these wetlands have low to moderate value for food chain production and migration support, and low value for nesting, spawning, and rearing. Tree clearing is proposed within W-20230821-1334-JT to complete project activities. The impacted PFO wetland would be replanted with tree species found in the surrounding wetland.

Wetland W-20231017-1503-JR was located on a forested hillslope and was adjacent to an existing roadbed. The wetland was small and had limited horizontal interspersion, microtopography, seed producing plant species and diverse cover habitat were observed. For these reasons, this wetland has low value for food chain production and migration support, and low value for nesting, spawning, and rearing.

S2.D(2)(d) Recreation

The impacted wetlands are located on private property and public state forest lands. Though the wetlands are accessible to public, most of the wetlands are small and would not likely provide any significant recreational value.

S2.D(2)(e) Upstream and Downstream Property

The properties surrounding the project consist of second growth forest, wetlands, streams, existing natural gas infrastructure and small pockets of agricultural areas. The proposed work will likely have no effect on upstream or downstream properties due to the temporary nature of the construction activities. Additionally, E&S BMPs (see Appendix B of the JPA) will be implemented to control sediment during construction to protect against sedimentation to downstream properties.

S2.D(3) Lacustrine Resources

No lacustrine resources were identified onsite.

S2.D(4) Other Environmental Factors

No other environmental studies were used for this Environmental Assessment.

MODULE S3: IDENTIFICATION AND DESCRIPTION OF POTENTIAL PROJECT IMPACTS

S3.A Proposed Permanent and Temporary Impacts

Ten (10) wetlands, twenty-six (26) streams, and thirty-nine (39) assumed floodways will be crossed by the proposed project. This includes impacts to 0.130 acre of the 3.642 acres of wetland identified within the AOI, 1,723 linear feet of the 21,886 linear feet of stream identified within the AOI, and 5.090 acres of the approximately 50.243 acres of assumed floodways identified onsite. All impacts are associated with construction of the permanent access road.

Refer to Section S1.B(4) above for a summary of proposed permanent and temporary impacts.

Tables 4-1 and 4-2 provide a summary of the type and size of each impact. Refer to Appendix B of the JPA for plan views and profiles of each proposed water resource crossing.

S3.B Standard Information Responses

Items (ii) through (viii) are not located within the project LOD or within 100 feet of the project limits. Item (i), Loyalsock State Forest, is located within the project LOD. Refer to Figure 4-2 for the Resource Identification Map.

The project LOD is located on a 7,325-acre tract of Loyalsock State Forest. The permanent access road and staging area were designed based on DCNR Guidelines for Administering Oil and Gas Activity on State Forest Lands and project specific guidance provided by the Loyalsock State Forest District. Impacts to natural resources were limited to the extent practicable and designed to maintain natural function. No DCNR mapped hiking trails (Appendix F; Figure 6) or camping areas (reference: <https://pennsylvaniastateparks.reserveamerica.com/>) are located within the project area. A comment had been raised about a trail leading from the top of the hill down to Jacoby Falls. PGE confirmed with DCNR that no maintained trails are located within this area. PGE also conducted its own site visit and found no trails to exist leading down the hill to Jacoby

Falls Trail. The nearest DCNR hiking trail is the Jacoby Falls Trail which is approximately 0.25 miles west of the project area. Only gated DCNR administrative roads were identified within the LOD. Due to the temporary nature of the construction, the project will not limit or degrade public recreation opportunities within Loyalsock State Forest. For additional discussion on how the project is consistent with DCNR's management of State Forest Lands, please refer to Module S3.F(5)(b) below.

S3.C Subfacility Details Tables

See Table 4-3 for the subfacility detail tables.

S3.D Resource Function Effects

S3.D(1) Hydrologic

The access road and staging area have been designed so that impacts to natural drainage patterns and flushing characteristics are minimized.

The hydrologic functions of the impacted wetlands would be permanently impacted since portions of the wetlands would be permanently converted to gravel access road and graded roadbed. Adjacent wetlands downslope of the proposed road are unlikely to experience disrupted hydrology as they currently exist despite the hydrologic disturbance from existing DCNR road that the proposed road will replace. Wetland W-20230821-1157-JT will be directly impacted by the proposed access road but does not appear to contribute hydrology to the adjacent wetland W-20230821-1247-JT due to the presence of the existing DCNR road. The unimpacted portion of W-20230821-1157-JT will also likely not be affected given its position topographically and the location of groundwater inputs observed in the field. Wetland W-20230821-1351-JT abuts the existing road on the downslope side and does not appear to share hydrology with the wetland on the upslope side of the road. Wetlands W-20230821-1417-JT, W-20231018-1027-JT, W-20250606-1140-PMS and W-20230822-1345-JT are also on the downslope side of the road and rely primarily on groundwater and overbank flow from abutting streams for hydrology; these

wetlands likely have self-sustaining hydrology that is unlikely to be disturbed from wetland impacts upslope of the existing road.

For the portion of the wetlands that would be temporarily impacted during construction activities, wetland topography would be restored to its approximate pre-construction elevations. Topsoil will be segregated and replaced, maintaining the natural seed bank. After construction, the temporarily impacted part of the wetland will also be seeded with a wetland seed mix to promote vegetative restoration. The impacted PFO wetland would be replanted with tree species found in the surrounding wetland. Some loss of hydrologic function is likely due to wetland loss but the cumulative effect is likely minimal due to the wetlands being low functioning.

The hydrologic functions of streams crossed by the access road would be permanently impacted but minimal. Downstream hydrologic connection will be maintained by use of open bottom structures (i.e., bottomless arch culverts and bridges).

Bridges and bottomless culverts maintain the streams' ability to contribute to groundwater recharge along the length of the impacted portion of stream; therefore, groundwater recharge functions would be maintained.

Temporarily impacted streams would be stabilized, and substrate will be returned to original contours. The bridge replacement proposed at the Wallis Run crossing will not require instream work or placement of fill in the stream thus not disrupting hydrologic function.

Additionally, strict implementation of E&S BMPs and SCMs will be utilized as required by the project's Erosion and Sediment Control General Permit (ESCGP-4).

S3.D(2) Biogeochemical

The biogeochemical functions of the impacted wetlands would be permanently impacted since portions of the wetlands would be permanently converted to gravel access road and graded roadbed. For the portion of the wetlands that would be temporarily impacted, wetland topography would be restored to its approximate pre-construction elevations. Topsoil will be segregated and

replaced, maintaining the natural seed bank. After construction, the temporarily impacted part of the wetland will also be seeded with a wetland seed mix to promote vegetative restoration. The impacted PFO wetland would be replanted with tree species found in the surrounding wetland. Though some biogeochemical functions will be lost, the cumulative effect would likely be minimal due to the wetlands being generally low functioning.

The biogeochemical functions of permanently impacted streams would be permanently impacted but minimal, and in some respects, improved as portions of the state forest road being upgraded as part of this project currently lacks conveyances and includes multiple ford crossings. By installing bridges at existing ford crossings and an open bottom aluminum arch pipe across Stream S-20230822-1301-JT, sedimentation into these streams forced by the current state forest road would be reduced.

Biogeochemical function, such as pollution and sediment trapping, removing and burying metals and other toxic compounds, and enhancing biological transformation and degradation of nutrients and organic pollutants, along the length of the bottomless structures would still be possible, and therefore, these functions would be maintained.

Temporarily impacted streams would be stabilized, and substrate will be returned to original contours. The bridge replacement proposed at the Wallis Run crossing will not require instream work or placement of fill in the stream thus not disrupting biogeochemical function.

S3.D(3) Habitat Attributes

Permanent habitat loss would occur for portions of the wetlands that are permanently converted to gravel access road and graded roadbed. For the portion of the wetlands that would be temporarily impacted, wetland topography would be restored to its approximate pre-construction elevations. Topsoil will be segregated and replaced, maintaining the natural seed bank. After construction, the temporarily impacted part of the wetland will also be seeded with a wetland seed mix to promote vegetative restoration. The impacted PFO wetland would be replanted with tree species found in the surrounding wetland. Net loss of habitat and food chain production will occur but would be minimal due to the wetlands being generally low functioning.

Wallis Run (Stream S-20230821-1148-JT) and Stream S-20230822-1301-JT are perennial streams which have suitable fish habitat. Wallis Run will include a single span bridge replacement and Stream S-20230822-1301-JT, which is currently forded by the existing DCNR access road, will be crossed via an open bottom aluminum arch pipe to maintain fish passage. All other streams crossed by the proposed access road lack suitable fish habitat but will be crossed via bridges to maintain other forms of aquatic life passage. Where located within the 1,000-foot buffer of vernal pools, some bridges will be utilized, in addition to dedicated wildlife passages, for amphibian passage to and from the vernal pools during the breeding season.

Permanent impacts to the riparian habitat of streams would occur where forested riparian areas are proposed to be cleared and maintained along the permanent access road. The LOD in riparian areas were reduced to the extent practicable and alternative SCM BMPs were utilized, such as compost filter sock infiltration berms, which can be installed in forested areas without the need for tree clearing. These alternative methods helped to greatly reduce riparian habitat loss.

Temporarily impacted streams would be stabilized, and the stream bed will be returned to original contours.

Based on the results of the botanical survey, DCNR does not expect impacts to great-spurred violet (*Viola selkirkii*) or mountain bugbane (*Actaea podocarpa*). Direct impacts to herbaceous vernal pond habitat is not proposed by the project, but measures recommended by DCNR to avoid indirect impacts to this sensitive habitat will be followed by PGE, thus avoiding impacts.

Based on EnviroScience's timber rattlesnake survey, gestation habitat is expected to be impacted, however, with the implementation of the PFBC's recommended conservation measures, which include building new gestation habitat, no net loss to timber rattlesnake habitat is expected to occur.

USFWS determined that the project has no effect on northeastern bulrush (*Scirpus ancistrochaetus*) and concurred with KES's determination that the project is "Not Likely to Adversely Affect" northern long-eared bat (*Myotis spetentrionalis*) provided tree clearing

restrictions are implemented. PGC also recommended seasonal tree clearing to avoid impacts to little brown bat (*Myotis lucifugus*) and recommended conservation measures for protecting forest bird species. PGE intends to implement the recommended seasonal tree clearing restrictions and has followed conservation measures to protect forest bird species. Therefore, the project is unlikely to impact state or federally protected bat species and protects forest bird species in accordance with PGC guidance.

S3.D(4) Recreation

Most of the project area is located within Loyalsock State Forest. Loyalsock State Forest provides numerous outdoor recreational opportunities. No DCNR mapped hiking trails (Appendix F; Figure 6) or camping areas (reference: <https://pennsylvaniastateparks.reserveamerica.com/>) are located within the project area. A comment had been raised about a trail leading from the top of the hill down to Jacoby Falls. PGE confirmed with DCNR that no maintained trails are located within this area. PGE also conducted its own site visit and found no trails to exist leading down the hill to Jacoby Falls Trail. The nearest DCNR hiking trail is the Jacoby Falls Trail which is approximately 0.25 miles west of the project area.

Direct impacts are not proposed to Jacoby Hollow or Bar Bottom Hollow, a Class A wild trout stream, but impacts to unnamed tributaries are proposed. Direct Impacts are proposed to Wallis Run and its unnamed tributaries. Wallis Run occurs on private property within the project area, and an existing bridge is proposed to be replaced at the access road crossing. The bridge will not require instream work, is designed based on PADEP requirements, and will not impede fish movement within Wallis Run (Refer to Site-specific Drawing SC01). An open bottom aluminum arch pipe will be used to cross perennial Stream S-20230822-1301-JT to not impede fish movement. No fish were observed in the other streams crossed by the proposed access road nor did these streams have suitable fish habitat; these streams do not provide fishing opportunities. Nevertheless, these streams will be crossed via bridges to allow aquatic life passage.

PGE plans to follow instream work restrictions required for these wild trout streams. Except for a short period during construction, stream access in Loyalsock State Forest will not be restricted.

Therefore, the project is not anticipated to permanently affect trout fishing opportunities within or downstream of the project area.

S3.D(5) Upstream and Downstream Properties

The properties surrounding the project consist of second growth forest, wetlands, streams, existing natural gas infrastructure and small pockets of agricultural areas. The proposed work will likely have no effect on upstream or downstream properties due to the temporary nature of the construction activities.

Additionally, E&S BMPs (see Appendix B of the JPA) will be implemented to control sediment during construction to protect against sedimentation to downstream properties.

S3.E Antidegradation Analysis

Chapter 93 of the PA Code was used to determine if the receiving waters for the project are classified as special protection or siltation impaired. The Loyalsock Creek watershed is classified as EV, MF and is not siltation impaired; therefore, an antidegradation analysis is required for this project. Antidegradation Best Available Combination of Technologies (ABACT) approved E&S BMPs were utilized throughout the project to prevent degrading discharge. Below is a narrative of the “Non-discharge” BMPs utilized on this project.

Limited Disturbed Area – The amount of land disturbed within the LOD will be minimized to the extent practicable at all times. Land will only be disturbed at the rate necessary to progress the installation of the proposed access road and valve pad.

Immediate Stabilization – Disturbed area will be restored to meadow-good condition as soon as practicable following construction.

Other-Revegetation – Disturbed areas will be restored to meadow-good condition, unless otherwise noted on the plan drawings.

In addition, ABACTs are proposed for this project and include the following:

ABACT BMPs – Siltron Silt Fence or compost filter sock, sediment basins, rock filters with compost lining, and erosion control blanketing will be utilized upslope of special protection waters during construction to minimize the transport of sediment pollution to the special protection waters.

Based on the above summary, ABACT BMPs have been utilized to satisfy the requirements of this antidegradation analysis.

S3.F Alternatives Analysis

The purpose of this alternatives analysis is to demonstrate the environmental planning steps and evaluation of project alternatives performed to avoid and minimize stream and wetland impacts to the extent practicable, while still achieving the project purpose and need (see Module S1.B).

PGE implemented the following sequential planning process in developing, evaluating, and selecting the proposed design for the project.

- (1) Location alternatives, which included siting well pads on adjacent private lands and evaluating different access routes, were evaluated based on the location of PGE's targeted Marcellus formation, PGE's existing COP Tract 724 Pad A 2411 (Well Permit: 081-20208), landowner cooperation, existing access roads, preliminary identification of environmental and safety constraints, and DCNR guidance. Land ownership and environmental features were identified using available sources of geospatial and environmental data, including tax maps, aerial photographs, LiDAR topography, PADEP stream mapping, NWI maps, soil surveys, DCNR provided resources, and on-line databases (e.g., PADEP's eMapPA tool, PNDI on-line screening, ERDAS, etc.).
- (2) A preliminary project site location that avoided and minimized impacts to aquatic resources to the extent practicable while still achieving the project purpose and need was selected.

- (3) Detailed delineations of aquatic resources and PNDI environmental reviews were completed for the preliminary project location. Threatened and endangered (T&E) species and cultural resources studies were conducted for the preliminary project location.
- (4) A preliminary project design was developed based on the location of the identified aquatic resources, T&E species, T&E species habitat, cultural resources, topography, utilities, landowner requirements, access agreements, and other constraints. With most of the project occurring within Loyalsock State Forest, coordination with DCNR continued throughout the design phase to allow DCNR to provide guidance and approval on the proposed project design. DCNR and PGE also conducted site visits to assess project constraints and alternatives.
- (5) The project design was modified to avoid and minimize impacts to aquatic resources and T&E species to the extent practicable. This included reducing the project LOD where possible and the evaluation of best available technologies for stream crossings (e.g., culverts and their appurtenant works, open bottom culverts, French mattresses, and bridges) and SCM BMPs that reduced forest clearing to the extent practicable. As part of this step, input received from PADEP, the U.S. Army Corps of Engineers (USACE), and the general public as part of the JPA review were considered to further reduce impacts.
- (6) Final design adjustments (refining the LOD at aquatic resource crossings, alternative construction methods, etc.) were made to further reduce potential environmental impacts.
- (7) The final project design, which reduces impacts to aquatic resources to the greatest extent practicable while still achieving the project purpose and need and considering other site constraints (e.g., T&E species, DCNR requirements, topography, stakeholder concerns, etc.) is being provided to PADEP and the U.S. Army Corps of Engineers (USACE) for a final permit decision.

S3.F(1) Water Dependency Narrative

This project is water dependent because the access road cannot be constructed to access the staging area (future Pad C) or other future proposed pads without crossing streams. Due to the long linear nature of streams and the linear nature of the project, avoidance is not possible. Stream crossings are necessary to accomplish the project purpose.

S3.F(2) Location Alternatives

PGE evaluated the following location alternatives to reduce impacts to aquatic resources to the extent practicable. This included siting well pads on adjacent private lands and evaluating alternative existing access routes.

S3.F(2)(a) Siting Project on Adjacent Private Land

PGE has examined the possibility of eliminating development on COP Tracts 723 and 724 via extending laterals from existing well pads or relocating well pads to adjacent private land. The following are reasons this is infeasible:

- Technical feasibility – COP Tract 723 and COP Tract 724 are in the Ridge and Valley structural province near the Structural Front, resulting in numerous compressional thrust faults. The location of these thrust faults in the subsurface have been identified using reflection seismic. The location and throw of these faults require pads to be properly placed or horizontal wells will miss the Marcellus and be unproductive. In addition, the Marcellus is over 9,000 feet below the surface making drilling in this region technically challenging. The laterals would also exceed 20,000 feet and each well would have a total measured depth of 30,000 feet. It is believed that the likelihood of success for these wells is exceedingly low given the depth and faulting in the region.
- Relocate wells along SR 87 – This option is infeasible due to the residential nature of the Loyalsock Valley, the fact that residents would only sign non-surface development leases, the limited area not located in the 100-year floodplain, and the fact that there is no feasible way to route a pipeline from these well pads for the aforementioned reasons. Figures 2 and 3 in Appendix F depict the non-development areas and proposed PGE natural gas wells. In addition, DCNR will not allow a pipeline corridor to be located in the Loyalsock stream

valley that requires a cut right-of-way. PGE evaluated the feasibility of boring the valley walls for a pipeline and deemed it too risky.

- Relocate the well pads along Wallis Run Road – This option is infeasible due to the residential nature of the Loyalsock Valley, the fact that residents would only sign non-surface development leases, and the limited area not located in the 100-year floodplain (Appendix F; Figure 2). In addition, many of the landowners are leased by others in producing units which would preclude PGE drilling new wells from these lands.

These compounding limitations lead to the siting of the project within COP Tracts 723 and 724. The proposed location ultimately allows the project to access the targeted geologic formations to extract natural gas and complete the project in a practical manner.

S3.F(2)(b) Butternut Grove Road Access

Once it was determined that the project must be sited on State Forest Lands to be feasible, PGE assessed access options that included utilizing an existing access route (i.e., Butternut Grove Road) used for the construction and operation of COP Tract 724 Pad A 2411.

The development of multiple well pads and pipelines will require extensive truck traffic, and therefore, developing and using an access road located in a sparsely populated area is an important aspect of providing safe and practical access to the project sites. The traffic pattern map included in Appendix F (Figure 4) highlights the route that PGE will be taking for ingress and egress of the Saluda development. In previous years, EQT established this traffic pattern while developing pads in the area. EQT has also paved and widened most of these roads to accommodate two lane heavy truck traffic. The combination of a well-understood, pre-established truck route and existing road infrastructure upgrades offers an optimal and safe routing solution for PGE.

Topographical constraints and landowner opposition also make the use of Butternut Grove Road for truck traffic impracticable. Butternut Grove Road is a narrow road that currently cannot support two-way traffic. The east/west portion of the road is constrained by Loyalsock Creek to the south and a steep embankment to the north. As a part of PGE's analysis, truck turning templates were completed and clearly illustrate that the existing road cannot accommodate the proposed truck

turning radii. Turning radius drawings for the intersection of Wallis Run Road and Butternut Grove Road are provided in Appendix F (Drawing 1). The exhibits illustrate the turning radius needed for both a 90-foot and 115-foot truck and trailer and the space needed for road expansion. Both truck options would require significant road widening on the north side of the road. PGE attempted to gain landowner approval to widen the road in this area, and the request has been denied. The email from the landowner to PGE dated December 12, 2025 is provided in Appendix F.

Expansion of the north-south portion of Butternut Grove Road is infeasible due to residential properties being situated immediately adjacent to the road and would necessitate modifications to existing driveways. As this road also turns sharply north, significant expansion and modifications to the roadway would need to occur in order to accommodate heavy truck traffic. Exhibits 3 & 4 of Drawing 1 in Appendix F display the turning radius and expansion needed to accommodate both a 90-foot and 115-foot truck and trailer. Due to denial by the landowner (as stated above), PGE did not attempt to gain an easement for the expansion of this section of road. As Butternut Grove Road continues north into steeper terrain, there are multiple spots where the road would be too narrow for truck traffic; the eastern side could not be widened due to topography, and the western side could not be widened due to the current edge of road being the top of bank of Butternut Grove Run. Additionally, several overhead power lines exist along the edge of the existing road and relocation would be required. Pictures have been provided in Appendix F in order to accurately depict the limitations associated with this stretch of roadway.

Furthermore, if PGE were to utilize Butternut Grove Road for the development of the Saluda area, a truck staging area would need to be constructed for traffic control, which would necessitate additional disturbance. Trucks would need to be staged at a designated area and traffic halted along the entire access route in order to accommodate the large trucks (similar to Butternut Grove Road, Wallis Run Road is a narrow road and cannot accommodate two-way traffic for heavy trucks). The nearest feasible area for a potential staging area is the Aikey parcel to the north of the Butternut Grove Road/Wallis Run Road intersection. PGE attempted to obtain an easement from this landowner in the past and was denied. Please reference Figure 5 provided in Appendix F outlining these areas of concern.

During the planning process of PGE's Loyalsock intake project (which included the proposal of a gas pipeline running from Tract 726 to Tract 724/723, DCNR and PGE jointly issued two Q&As to local residents due to landowner concerns in that area. Friends of the Sock (FOTS) and Responsible Drilling Alliance (RDA) also voiced similar concerns in a December 2019 meeting in Harrisburg with the DCNR. The use of Butternut Grove Road for truck traffic is a major issue with local residents as well as FOTS and RDA, and PGE responded by making a commitment that if the northern route could be used, it would be. Landowner Q&A documents have been provided in Appendix F.

Even with minimal truck traffic during the Loyalsock intake construction, local residents voiced safety concerns. For this project, additional safety concerns arise from the heavy recreational use of Butternut Grove Road during the summer. Cars frequently park along the road for swimming at the confluence of Loyalsock and Wallis Run, which already lacks space for parking due to the steep drop-off. There is no room to increase the road width through this section, which would have the potential to create a significant safety hazard.

For these reasons, utilizing Butternut Grove Road for access to COP Tracts 723 and 724 for natural gas development would not be feasible.

Preliminary planning between PGE and DCNR for the COP Tracts 723 and 724 have been ongoing. A preliminary approval from DCNR has been received for the COP Tract 723 and 724 Access Road, the 723 Pad C staging area (future 723 Pad C), and 724 Pad B. Additionally, DCNR issued a letter to PADEP detailing the planning considerations that PGE has addressed in cooperation with DCNR for the project. A copy of these letters are provided in Appendix F.

Figure 1 provided in Appendix F shows the DCNR non-development areas. The road alignment was designed to avoid the vernal pool area of special consideration as much as possible. A section of the access road was, however, realigned to create a straight path for truck traffic and facilitate a potential future parallel pipeline. The existing north/south segment of Dad Chapman Road, which contains numerous vernal pools, has been excluded from the upgrade project as per DCNR guidance to protect these resources from heavy truck traffic. The project does involve a minor

encroachment into the protected area along the new western alignment, for which a waiver will be granted upon final approval.

A key aspect of the DCNR's oil and gas development guidelines include the minimization of disturbance. PGE is optimizing land use by locating the staging area on the footprint of a future well pad, which eliminates the need for an additional construction site. Sizing the initial staging area to the full well pad dimensions is the most efficient strategy, as it avoids repeated cycles of construction and reclamation, significantly reducing overall environmental disturbance. An equipment and materials layout showing how the staging area will be utilized is included in Appendix F.

S3.F(3) On-Site Alternatives

On-site alternatives were also limited due to the location of thrust faults in the area; DCNR's non-development areas and areas of special consideration; aquatic resource prevalence; rock outcrops; and steep slopes. One alternative design was evaluated by PGE and DCNR for this project.

- The Proposed Alternative (PA) - An approximately 44.3-acre LOD with a 3.9-mile-long permanent access road and 5.5-acre staging pad.
- On-Site Alternative 1 (A1) - An approximately 33.3-acre¹ LOD with a 3.8-mile-long permanent access road and 5.5-acre staging pad.

These alternatives are shown on Figures 4-3 and 4-4.

¹It should be noted that since this alternative was not selected, the design was not taken a step further to site SCMs and workspaces for construction nor did it consider LOD necessary for onsite mitigation; therefore, the LOD would be significantly larger had the design been progressed.

S3.F(3)(a) Proposed Alternative

S3.F(3)(a)(i) Aquatic Resource and Sensitive Feature Impact(s) Description

The PA was located mostly in second growth forest with small areas of open field, meadows and existing forest roads. Landowner and DCNR constraints, in addition to steep terrain, rock outcrops, aquatic resources, and known rare, threatened, and endangered species habitat, limited road alignment options. Additionally, the road needed to be designed to accommodate a safe grade for large trucks. Table 4-4 identifies the landscape description, total impacts, LOD acreage, and practicability rational summary for each alternative. Table 4-5 identifies the resources that would be impacted by each alternative.

S3.F(3)(a)(ii) Other Environmental Considerations

Other environmental considerations for the proposed project include T&E species, special concern species, rare and significant ecological features, local comprehensive plans and zoning ordinances, DCNR non-development areas, DCNR areas of special consideration, DCNR development guidelines, archeological resources and historic structures, special protection waters, and scenic rivers.

The presence or absence of other environmental considerations is summarized in Table 4-6.

S3.F(3)(a)(iii) Project-Specific Factors

The PA requires a 44.3-acre LOD and 3.9-mile-long permanent access road to access the proposed staging area and existing COP Tract 724 Pad A 2411. At request of private property owners and DCNR, 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. The PA was PGE's and DCNR's preferred design for the project.

S3.F(3)(b) On-Site Alternative 1

S3.F(3)(b)(i) Aquatic Resource and Sensitive Feature Impact(s) Description

A1 was located mostly in second growth forest with small areas of open field, meadows and existing forest roads. A1 was considered to avoid stream impacts on the east facing slope along the existing forest road between Pad C and the access road entrance off Wallis Run Road. Landowner and DCNR constraints, in addition to steep terrain, rock outcrops, aquatic resources and known rare, threatened, and endangered species habitat, limited road alignment options. Table 4-4 identifies the landscape description, total impacts, LOD acreage, and practicability rational summary for each alternative. Table 4-5 identifies the resources that would be impacted by each alternative.

S3.F(3)(b)(ii) Other Environmental Considerations

Other environmental considerations for the proposed project include T&E species, special concern species, rare and significant ecological features, local comprehensive plans and zoning ordinances, DCNR Non-Development Areas, DCNR Areas of Special Consideration, DCNR development guidelines, archeological resources and historic structures, special protection waters, and scenic rivers.

This alternative overlaps the buffer of the PNDI search discussed in section S3.D(3), a separate PNDI was not run for this alternative. However, it is anticipated that impacts to T&E species, special concern species, rare and significant ecological features would be similar to the PA. A1 uses an existing forest road that traverses through a DCNR area of special consideration that contains herbaceous vernal pools.

S3.F(3)(b)(iii) Project-Specific Factors

A1 requires a 33.3-acre LOD and 3.8-mile-long permanent access road to access the proposed staging area and existing COP Tract 724 Pad A 2411. However, it should be noted that since this alternative was not selected, the design was not taken a step further to site SCMs and workspaces for construction; therefore, the LOD would be significantly larger had the design been progressed.

At request of private property owners and DCNR, 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.

S3.F(4) Design Avoidance and Minimization

Avoidance and minimization was limited due to landowner and DCNR constraints, steep terrain, aquatic resources and sensitive resources. Complete avoidance when working in locations with numerous constraints can become costly; to the point where the project is not financially feasible. Regardless, complete avoidance is not possible because the project is water dependent.

S3.F(4)(a) SCM BMP Design Considerations

Project BMPs and SCMs were designed to minimal specifications allowed under PADEP and DCNR guidelines. 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 (see Appendix B of the JPA for the E&S 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 will be placed to minimize the potential for inadvertent disturbance during the E&S phase. The vegetation in these areas will only be removed as required to install and maintain the E&S BMPs and the SCMs 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.

S3.F(4)(b) Siting the proposed road along the existing DCNR Access Road

The existing DCNR Access Road was utilized where possible, but poor drainage along the road has led to the creation of wetlands and the development of stream channels within the road and roadside ditches. Specific details on why sections of the existing DCNR Access Road were not utilized are detailed below.

- Proposed Road Station 37+00 – 48+00 – 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.
- Proposed Road Station 49+00 – 53+00 – 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.
- Proposed Road Station 57+00 – 64+00 – 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 S-20230824-1304-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.
- Proposed Road Station 72+00 – 80+00 – 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.
- Proposed Road Station 131+00 – 141+00 – 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 lent 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.

- Proposed Road Station 152+00 – 202+00 – 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 Appendix F (Figure 1) for 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.

S3.F(4)(c) Stream Crossing Design Considerations

PGE assessed various stream crossing methods to reduce direct and indirect impacts to aquatic resources. Initially, culverts in combination with drop inlets and manholes and bottomless culverts were assessed. The purpose of the drop inlets and manholes were to reduce the limits of grading, and thus the impacts to the streams. Due to the high gradient nature of the streams (i.e., steep slopes), utilizing a culvert without drop inlets and manholes would require that the road elevation be raised to provide adequate depth of cover over the culvert on the inlet side. In turn, the limits of grading would greatly increase due to the prevailing slopes which would increase the length of the culvert and impacts to the streams while also impacting aquatic life passage.

The same would be true for bottomless culverts. Consulting guidance from Penn State University's (PSU) Center for Dirt and Gravel Road Studies (CDGRS), which focuses on research, guidance and technical assistance for the design and maintenance of dirt, gravel and low-volume roads, PGE determined that bottomless culverts are not suitable for use on stream slopes of greater than 6%. All but three of the stream crossings had stream slopes at or exceeding 6%.

Alternatively, flattening the slopes of the culverts and adding plunge pools on the downstream side presented the same aquatic life passage concerns as drop inlets because the outlet of the pipe would not be imbedded six inches as required. Plunge pools also present a significant erosion concern from a stream stability standpoint. Also considered were step pool structures to drop the gradient in a less severe manner than the plunge pools but were not feasible because the structures would

have to be constructed into the fill slope of the road to meet the elevation of the pipe outlet. Constructing step pools into the side of a fill slope presents a slope stability concern and threatens the integrity of the road.

Next, PGE assessed the use of French mattresses. French mattresses were assessed as an alternative that would not greatly increase the footprint of the road while maintaining aquatic life passage. Fish were not observed in the streams proposed to be crossed by French mattresses nor do the streams have suitable fish habitat; therefore, fish passage was not a concern. The streams did, however, support aquatic macroinvertebrate life. Aquatic macroinvertebrates are known to move within the interstitial spaces of the hyporheic zone. The French mattress would consist of R-3 to R-5 sized riprap wrapped in PennDOT Class 1 non-woven geotextile. The standard accepted porosity void space of riprap is 40% which was expected to be sufficient to allow for the movement of aquatic macroinvertebrates. While vertical movement would be restricted by the geotextile fabric, it was expected that aquatic macroinvertebrates could move laterally through the interstitial spaces of the French mattress which maintain a continuous hydrologic connection between the upslope and downslope portions of the streams. While French mattresses would provide a feasible alternative that reduces impacts and maintains some degree of aquatic life passage, other functions, such as groundwater infiltration and biogeochemical function were lost.

PGE's final and preferred stream crossing method is the use of bridges. While bottomless culverts were not suitable for slopes exceeding 6%, bridges could be used on slopes greater than 7-8%. Additionally, unlike culverts, depth of cover and maintaining aquatic life passage are not a concern. Therefore, the road grading could be kept to a minimum. Bridges would also maintain stream connectivity and natural biologic, hydraulic and hydraulic functions better than French mattresses. Bridges have the added benefit of providing passage to amphibians seeking vernal pool habitat to lay their eggs.

Bridges were ultimately chosen due to the reduced crossing footprints, maintained ecological function and natural slope and downstream connectivity. The proposed bridges are designed wide enough to allow the stream to maintain natural stream morphology and reduce backwatering, debris jams and general maintenance. Aquatic organism passage can occur naturally through natural stream habitat both horizontally and vertically. Additionally, the use of bridges provide additional wildlife passages that can be utilized by terrestrial and semi-terrestrial fauna.

S3.F(5) Comparison of Alternatives

The proposed future well pads cannot be sited off State Forest Lands due to the unique geology of the target formation and lack of availability of developable land surrounding COP Tracts 723 and 724. The use of Butternut Grove Road is not feasible due to constructability issues; the inability to obtain easements from landowners for necessary road improvements and staging areas; public opposition; and public safety concerns. Therefore, to meet the project purpose and need, the project must be located on Loyalsock State Forest.

Ultimately, the PA design was selected as the proposed layout because it is agreeable to the affected landowners and DCNR, reduces impacts to forested wetlands, fulfills the project purpose and need, meets design requirements, and can be constructed in a safe and reliable manner that adheres to industry safety standards. A1 would result in similar earth disturbance (i.e., after the design was progressed to accommodate SCMs, workspaces, and onsite mitigation) and utilize a slightly shorter access road but would require significantly more permanent impacts to PFO wetlands and would include thirteen additional resource crossings. Stream and floodway impacts are slightly less than the PA, but all impacts would be new disturbance.

With the additional alignment adjustments and design considerations described in S3.F(4), the PA reduces environmental impacts to the greatest extent practicable, while meeting all landowner, DCNR, design, and other site constraints. Refer to Tables 4-4 through 4-6 for a comparison of the two on-site alternatives that were agreeable to landowners and DCNR.

S3.F(5)(a) Aquatic Resource and Sensitive Feature Impact(s) Description

The PA requires a slightly longer permanent access road that impacts more streams and floodways than A1. However, the PA has less PFO impacts and no PSS loss or conversion unlike A1. Additionally, some streams impacted by the PA are historically disturbed by an existing state forest road and likely don't function naturally. A1 doesn't follow the existing forest road as much as the PA and impacts would be new disturbance to resources that have otherwise not been disturbed in the recent past. The PA and A1 cross three (3) perennial streams, all of which are designated wild trout streams. A1, however, crosses a tributary to Bar Bottom Hollow, a designated Class A wild trout stream. The PA avoids this stream.

S3.F(5)(b) Other Environmental Considerations

The proposed project is consistent with DCNR's management of State Forest Lands under a sustainable multiple-use framework and satisfies the public interest balancing considerations applicable to this permit review.

State Forest Lands are managed as working forests to balance conservation, recreation, timber, water, habitat, and mineral resources. Mineral development is recognized within the State Forest Resource Management Plan as a component of State Forest resource management, subject to environmental safeguards and balancing of other forest values (reference: DCNR Bureau of Forestry, State Forest Resource Management Plan [2016]). Responsible oil and natural gas development pursuant to valid lease rights is an anticipated and regulated use within that framework.

The proposed access road is necessary to develop leased subsurface mineral resources and is therefore consistent with DCNR's recognized role in managing mineral development alongside other forest values.

Consistent with both DCNR's multiple-use mandate and PADEP's public interest standard, the project has been designed to avoid and minimize impacts to aquatic resources and forest integrity:

- The selected alignment reduces overall surface disturbance to the extent practicable.

- Stream and wetland impacts have been avoided where feasible and minimized where unavoidable.
- Erosion, sediment, and stormwater controls have been incorporated to protect water quality.
- The disturbed footprint has been limited to that necessary for safe access and long-term stability.

The alternatives analysis evaluated practicable alignments and design variations, and the selected alternative represents the least environmentally impactful practicable option capable of achieving the project purpose.

The project does not materially impair long-term forest productivity, water resources, or ecological function. Temporary construction impacts will be stabilized and restored, and permanent disturbance has been minimized. The project remains compatible with broader State Forest management objectives, including recreation and habitat management.

Under the public interest framework, PADEP evaluates whether a project unreasonably degrades or impairs public natural resources when balanced against its benefits. Here:

- The project facilitates development of publicly owned mineral resources consistent with established leasing authority.
- Development contributes to the Oil and Gas Lease Fund, which supports conservation and forest management programs.
- Environmental impacts have been minimized and mitigated to the greatest extent practicable.

When balanced against the limited and controlled impacts associated with the selected alignment, the project advances legitimate public resource objectives without resulting in unreasonable degradation of Commonwealth resources.

In conclusion, the project reflects the type of balanced resource management decision contemplated under DCNR's State Forest mission and satisfies the public interest considerations applicable to this permit review. The project enables lawful mineral development while incorporating avoidance, minimization, and protection measures that preserve long-term forest and aquatic resource integrity.

S3.F(5)(c) Project-Specific Factors

Siting the proposed future well pads off State Forest Lands would not achieve the project purpose and need due to the nature of the target formation. The other alternatives evaluated, however, would serve the purpose of supporting existing and future natural gas extraction operations of COP Tracts 723 and 724. Terrain, aquatic resource avoidance, sensitive resource avoidance, landowner constraints, and DCNR requirements, among other considerations, proved to be factors which prohibited the use of Butternut Grove Road and A1 from being viable alternatives. The PA was ultimately chosen based on meeting the project purpose and need while balancing constraints and achieving DCNR approval.

S3.G Potential Secondary Impact Evaluation

Temporary E&S BMPs will be utilized to eliminate or reduce offsite erosion and sedimentation during construction and permanent SCMs will be utilized to control stormwater runoff post-construction to the extent practicable following construction. An E&S plan, SCM plan, and site restoration plan were submitted as part of the project's ESCGP-4 permit. Therefore, potential secondary impacts associated with stormwater runoff during construction and natural gas extraction operations will be minimized.

S3.H Cumulative Impacts Evaluation

The project involves the construction of a 3.9-mile-long permanent access road and 5.5-acre staging area pad that will support current and future natural gas extraction operations. Impacts associated with this project would contribute to the overall cumulative impacts of the natural gas infrastructure (i.e., compressor stations and natural gas pipelines), tertiary (local) roadways, and

cleared areas that currently exist in the vicinity of the proposed project. The gas will then be processed and transported via pipelines to market where it will be sold to consumers.

PGE has considered all components of the project when planning and designing the project to help minimize overall cumulative impacts. Anticipated Cumulative Impacts associated with the overall planned and constructed project are provided in Table 4-7. 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 pad operations will be supported by the proposed Saluda Pipeline and permitted Loyalsock/Shawnee Freshwater System (Freshwater Withdrawal) and Saluda Lower Staging Area.

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.

25 Pa. Code § 105.18a emphasizes that projects impacting EV wetlands must demonstrate that the project avoids and minimizes impacts, demonstrates no practicable alternative which reduces impacts, complies with strict EV water quality standards, avoids resource deterioration, limits cumulative impacts, and provides the appropriate compensatory mitigation. The project has been designed to meet Antidegradation (Special Protection) Requirements for EV Waters under 25. PA Code § 93.4a(d) by assessing project alternatives, implementing ABACTs, and demonstrating the project will result in non-degrading impacts to adjacent resources.

Compensatory mitigation proposed in Section S.4 will result in the purchase of mitigation credits from the Babb Creek Mitigation Bank located within the Babb Creek watershed in Charleston Township, Tioga County. Waters within the bank are classified as EV and are identified as

naturally reproducing trout streams by PFBC. The mitigation bank is also located in near proximity of public land resources that include Tioga State Forest (<2 miles) and Hills Creek State Park (5.3 miles). Given the mitigation bank's attributes, credits purchased for impacts associated with the project are appropriate in-kind mitigation that reduce the likelihood of net loss of aquatic resource function within the greater watershed.

MODULE S4: MITIGATION PLAN

In planning the access road and staging area, PGE implemented the sequence of actions specified by the definition of mitigation in 25 Pa. Code § 105.1 and 33 CFR Parts 325 and 332 (i.e., the 2008 Mitigation Rule):

- avoid and minimize impacts by limiting the degree or magnitude of the action and its implementation;
- rectify the impact by repairing, rehabilitating, or restoring the impacted environment; and
- reduce or eliminate the impact over time by preservation and maintenance operations during the life of the action.

If the impact cannot be eliminated by following these actions, PGE will compensate for the impact by replacing the environment impacted by the project or by providing substitute resources or environments. Sections S4.A-C below describe the process PGE followed to satisfy each of the three actions listed above.

S4.A Resource Avoidance and Impact Minimization

The Alternatives Analysis in Module S3.F describes the process by which PGE selected the least impactful road route and staging area while still achieving the project purpose and need. The proposed alignment for the project impacts the least amount of wetland, reduces new disturbance, requires less PFO impacts, avoids PSS loss and minimizes impacts to the extent practicable.

The road was routed to first avoid impacts to wetlands and streams. However, due to the long linear nature of many streams, it was not possible to avoid them and still meet the project purpose and need. Site constraints, such as topography, vernal pool habitats, and other wetlands and streams, made the avoidance of all wetlands impracticable.

After assessing the unavoidable resource impacts associated with the project, establishing minimization measures was the next step in the planning process. Reducing construction right-of-

way widths at the crossings was a measure used by PGE to minimize environmental impacts to aquatic resources. The right-of-way widths for wetland and stream crossings were reduced to the extent practicable, thereby reducing the acreage of disturbance. Other measures taken to minimize impacts included but were not limited to: crossing resources along existing road corridors, crossing wetlands at narrow locations, crossing emergent portions of wetlands rather than scrub-shrub and forested portions, and siting workspaces outside of floodways and wetlands, where feasible.

PGE also evaluated several stream crossing design alternatives to minimize impacts to streams. These included culverts with inlet structures and manholes, plunge pools, step-pool structures to eliminate inlet structures and manholes, bottomless culverts, French mattresses, and bridges. Bridges and bottomless culverts were ultimately chosen to reduce impacts to streams to the greatest extent practicable.

Additionally, E&S BMPs will be utilized to minimize sedimentation impacts during construction, and SCMs will be utilized to minimize sedimentation post-construction. Further, an alternative infiltration berm design which avoids tree clearing is proposed to reduce riparian forest impacts. Please refer to the project plans in Appendix B of the JPA for details and notes regarding impact minimization measures at wetland and stream crossings.

S4.B Repair, Rehabilitation, and Restoration of Impacted Resources

S4.B(1) Repair, Rehabilitation, and Restoration of Impacted Resources

The temporary impacts from the proposed crossings will be restored in approximately one year through restoration of topography, soils, and herbaceous vegetation. Additionally, a portion of the forested wetland W-20230821-1334-JT that must be cleared to accommodate construction will be replanted with similar tree species to avoid permanent conversion impacts.

Specially formulated seed mixtures will be used in riparian areas and within wetlands to help reestablish and diversify wetland plant communities. Please refer to the E&S plans in Appendix B of the JPA for seed mixtures, and restoration notes and details.

S4.B(2) Perseveration and Maintenance Operations

PGE will limit the road width to a 12- to 16-foot corridor centered on the roadway. The staging area was placed in a location to avoid permanent impacts to wetlands and streams. The staging area will only temporarily impact one floodway of an intermittent stream to accommodate construction. Riparian areas outside of the roadway corridor and staging area will not be maintained. This will allow the temporary construction workspaces to reestablish existing functions following construction.

S4.C Compensatory Mitigation

The project will result in the permanent loss of 0.048 acre of wetland, 0.034 acre of wetland conversion, and 350.7 linear feet of stream, not including the bridge replacement across Wallis Run (Stream S-20230821-1148-JT). To compensate for these losses, PGE proposes to replant the 0.034 acre of wetland conversion and restore 246.4 linear feet of stream channel by removing existing stream culverts located along the DCNR Access Road. For the remaining 0.048 acre of wetland and 104.3 linear feet of stream not restored on-site, PGE will purchase credits at a 3:1 ratio from the First Pennsylvania Resource, L.L.C. (FPR), a wholly-owned subsidiary of Resource Environmental Solutions, L.L.C. (RES), Babb Creek Mitigation Bank located in Charleston Township, Tioga County, Pennsylvania. Mitigation credits needed at 3:1 would be 312.9 linear feet of stream and 0.14 acre of wetland. On-site and off-site mitigation is summarized in Table 4-8.

S4.C(1) On-Site Mitigation Objectives

PGE proposes reclamation of existing culverts along the existing DCNR Access Road as depicted on Figure 4-5 and summarized in Table 4-8. Within the four reclamation areas, 12 culverts which convey streams, and one culvert located in uplands, would be removed. The proposed culvert removal would result in the restoration of 20.0 linear feet of perennial, 198.6 linear feet of intermittent, and 27.8 linear feet of ephemeral stream channel for a total of 246.4 linear feet of stream channel restored. Culverts will be removed and a channel will be constructed to match the natural stream channel dimensions and substrate above and below the road. Three of the restored stream channels (Streams S-20230821-1402-JT, S-20230822-1015-JT, and S-20230822-1218-JT)

will be partially crossed by the road via prefabricated bridges. The DCNR Access Road reclamation areas are intended to reduce sediment delivery, restore natural hydrology patterns and improve function of aquatic, riparian and terrestrial ecosystems.

PGE proposes on-site wetland mitigation to compensate for the conversion of PFO wetland at W-20230821-1334-JT by replanting the 0.034 acre of converted wetland.

The remaining mitigation debits will be addressed by purchasing mitigation credits from the Babbs Creek Mitigation Bank at a 3:1 ratio.

S4.C(2) Site Selection

Road reclamation areas were selected based on an approach that reduces unnecessary aquatic resource impacts and maintains a likelihood for potential functional uplift to adjacent areas. Areas were considered for reclamation that could be reclaimed in a practical manner without increasing disturbance or disrupting natural reclamation processes. The excluded road areas will avoid impacts to aquatic resources such as sensitive herbaceous vernal pool habitats and EV wetlands and streams. It is anticipated that the non-reclaimed sections of road will be passively reclaimed through natural succession as the road is primarily an unimproved dirt two-track road and indirect functional uplift is possible. Photos showing the condition of the existing DCNR Access Road are included with the figures and photograph locations are included on Figure 4-5.

Wetland restoration will occur within the impacted wetland area where conversion will occur.

S4.C(3) Site Protection

The reclamation areas are located within the Loyalsock State Forest and will be protected through DCNR resource management practices established for state forests. Signage will be installed around the wetland restoration area to alert maintenance crews to refrain from mowing the area. Please refer to Detail 7 on Sheet C342 of the E&S Plans.

S4.C(4) Baseline Information

Baseline data for streams to be restored onsite is summarized in Table 4-9. The streams proposed to be restored are high gradient headwater streams situated on forested hillslopes with small drainage areas and support little to no aquatic fauna. These streams are appropriate onsite mitigation for proposed permanent impacts associated with construction of the proposed access road as the majority of the crossings are ephemeral and intermittent streams and some of the same stream reaches crossed by the project will include restoration via the culvert removal. Additional information on the streams to be restored can be found in the Waters Delineation Report and associated addendum (Appendix A).

S4.C(5) Determination of Credits

On-site restoration is proposed at a 1:1 ratio, while off-site restoration is proposed at a 3:1 ratio to balance adverse impacts. These ratios have been discussed and approved during meetings with both PADEP and USACE. Off-site restoration will be at the Babb Creek Mitigation Bank located in Charleston Township, Tioga County, Pennsylvania. A compensatory mitigation approach and credit commitment letter for the purchase of the bank credits can be found in Appendix E.

S4.C(6) Mitigation Work Plan

Except for the culvert reclamation at Streams S-20230821-1402-JT, S-20230822-1015-JT, and S-20230822-1218-JT where bridges will be installed, culvert reclamation along the DCNR Access Road will be completed following the access road construction and reclamation sequences provided on Sheets C405-C409 of the E&S plans (Appendix B of the JPA). Decommissioning of the existing road and associated culverts will consist of loosening the roadbed material, seeding, and mulching to promote vegetative growth. The reclamation area will be seeded with native riparian species using Ernst Seed's Seed Mixtures for Riparian and Wetland Habitats Mix (ERNMX-211) or a suitable replacement utilizing only native species (Sheet C321 – Detail 1 and Sheet C921 – Detail 3). The sequence of the decommissioning work will be done in a manner to avoid crossing streams that have been restored. Rubber tracked equipment will be utilized and will remain within the confines of the existing roadbed.

The restoration area for Wetland W-20230821-1334-JT will be planted with native water-tolerant to somewhat-water tolerant trees, which will be selected from the list of species on Sheet 342, Detail 6 of the E&S Plans. The species listed in this table occur within and adjacent to the impacted wetland. Planting information is also provided on Sheet 342, Details 5 and 6. Trees planted will consist of 1-gallon (#1) containerized plant material. Planted trees will be planted at a density of 400 trees per acre and spaced to prevent competition of tree species. Initial tree plantings will be such that no single species shall comprise more than 25% of planted trees.

S4.D Monitoring Plans

S4.D(1) Maintenance Plan

Maintenance along the proposed access road will be limited to the minimum required to maintain the access road right-of-way. Culverts and bridges will be maintained regularly to avoid disruption to hydrologic and hydraulic function up and downstream.

Signage will be installed around the wetland W-20230821-1334-JT planting area to alert third parties that the area is protected, and vegetation should not be disturbed. Tree shelters or wire fence will also be used to protect these plantings from damage by wildlife. See signage and tree shelter details included with the E&S Plans (Sheet C342, Details 5-7).

S4.D(2) Performance Standards

The proposed on-site mitigation will provide 246.4 linear feet of stream restoration and 0.034 acre of wetland restoration. Success of the project will be determined by attainment of the following performance standards.

- 1) Achieve 70% vegetative cover within restoration and reclamation areas.
- 2) Stream channels demonstrate a stable geomorphic condition (i.e., no signs of significant lateral or vertical degradation within the restoration limits)
- 3) The wetland tree planting area will demonstrate 85% survival following Year-1 monitoring or supplemental planting will be required.
- 4) Invasive species shall not comprise of more than 10% of the vegetative cover.

S4.D(3) Monitoring Requirements

PGE will monitor the on-site mitigation areas once annually for a period of five years, with monitoring conducted in the summer of each year following construction. PGE will provide annual monitoring reports to the PADEP and USACE by December 31st of each monitoring year. Mitigation monitoring reports will be prepared according to the guidelines presented in the USACE Regulatory Guidance Letter (RGL) No. 08-03 for the minimum monitoring requirements for compensatory mitigation projects involving aquatic resources and will include:

- Photographs from permanent photograph locations that are keyed to a site map;
- Data tables on stem density and growth of planted trees in the wetland restoration area;
- Assessment of attainment of performance standards; and
- Recommendations for corrective actions.

S4.D(4) Long-term Management Plan

This mitigation plan is designed to survive well beyond the monitoring and maintenance period. Maintenance issues and recommended remediation measures identified during monitoring will be detailed and documented in the monitoring reports. PGE is committed to the success of this project and will address corrective actions in a timely manner. The five-year monitoring and maintenance period is intended to cover the period of time when issues are most likely to arise. If the site is meeting all performance standards by the end of the fifth (or prior) year, then the project should be considered successful and able to sustain itself well into the future. PGE also reserves the right to request for early release in the event that success is achieved earlier than the five-year monitoring period.

S4.D(5) Adaptive Management Plan

If a natural or manmade event disturbs the mitigation site during the five-year monitoring period, PGE will restore the disturbed areas in the same manner that is described in the work plan in S4.C(6). Should a significant disturbance occur, PGE will notify PADEP and USACE of the damage and will outline the methods proposed to restore the site.

S4.D(6) Financial Assurances

PGE is financially secure with regard to its ability to complete all required mitigation activities, including all necessary post-mitigation monitoring and maintenance. PGE intends to operate and maintain its assets on COP Tracts 723 and 724 for the life of the proposed natural gas wells.