

August 28, 2026

Department of Environmental Protection
Office of Oil and Gas Management
208 West Third Street Suite 101
Williamsport, PA 17701

Subject: Erosion and Sediment Control General Permit
Saluda Access Road and Staging Area
Pennsylvania General Energy Co., LLC
Gamble and Cascade Townships, Lycoming County
CEC Project 334-659

On October 3, 2025, Pennsylvania General Energy Co., LLC (PGE) submitted an Erosion and Sediment Control General Permit (ESCGP-4) to the Pennsylvania Department of Environmental Protection (PADEP) for construction of the Saluda Access Road and Staging Area in Gamble and Cascade Townships, Lycoming County, Pennsylvania. The project includes approximately 3.9 miles of permanent access road and an associated staging area.

PADEP issued a correction notice on the ESCGP-4 on October 30, 2025. In response, Civil & Environmental Consultants, Inc. (CEC), PGE's civil engineering consultant, addressed the comments from the PADEP and PGE submitted a response on December 23, 2025. Following public comments on the application, PADEP held a virtual public hearing on February 3, 2026, and subsequently issued a pre-denial letter for the project on February 9, 2026, with additional technical comments. CEC and PGE revised the permit package to address the technical comments and resubmitted on March 20, 2026.

On May 6, 2026, PADEP denied the ESCGP-4 and Joint Permit Application (JPA) based on the outstanding technical deficiencies identified below in italics. PGE has addressed those deficiencies through revised plans, updated stream-crossing designs, additional supporting information, and revisions to the mitigation approach.

1. *Plan drawings and cross sections ("plans") have been updated based on responses to technical deficiency notices sent by the Department on 11/20/2025 & 02/09/2026 but still include at least the following deficiencies:*
 - *Plans at station 32+50 depict the proposed access road cut within existing grades lower than the grades proposed on either side of the roadway. The proposed grading fails to:*
 - i. *Maximize protection of existing drainage by maintaining flow of the proposed stream relocation within the proposed stream channel as required by 25 Pa. Code §105.13(e)(1)(x)*

PGE RESPONSE: The road has been redesigned in this area so that proposed grades are higher than existing grades on either side of the proposed road. In addition, the road alignment and grading have been updated to avoid impacts to Stream S-20230822-1412-JT, and therefore, no longer require a proposed stream relocation.

- ii. *Manage stormwater runoff from the access roadway through the designed SCM (infiltration berm 2-1) as required by 25 Pa. Code §105.13(e)(1)(v)*

PGE RESPONSE: The redesigned road will direct stormwater runoff to infiltration berm 2-1.

- *Plans provided are inconsistent with each other not meeting the requirements of 25 Pa. Code §105.13(e)(1)(i). Sheets C314 & C914 depict Culvert 23A with a drop inlet structure located approximately at ST140+50 and a bridge located approximately at ST139+50 but sheets C401 and C503 depict Culvert 23 at ST139+58.*

PGE RESPONSE: Sheets C401 and C503 have been updated to depict Inlet 23A and Culvert 23A at Sta 140+68 to be consistent with sheets C314 and C914.

- *Plans have been updated to show sheet piling installed for the bridge construction at Wallis Run located near ST4+00 to detail excavation limits. Sheet piling is proposed immediately adjacent to Wing B but plans appear to indicate a spread footing design for wingwalls. Pursuant to 25 Pa. Code §105.13(e)(1)(i).*

PGE RESPONSE: The limit of disturbance has been revised near Wing B on the bridge at Wallis Run to allow for more room between the vertical shoring and wing wall. This can be found on page C928 of the project plan drawings.

- *Plans have been revised to show additional bridge crossings at multiple locations but provide only typical abutment construction details with the note “Abutment and wingwalls for bridge structure will be designed by the bridge manufacturer in accordance with appropriate loading and will accommodate the grading as shown on these plans” despite the bridges ranging from 50 to 100 feet in length. Geotechnical studies have not been performed at these locations to evaluate whether excavation limits for bridge construction can remain within the LOD. See 25 Pa. Code §§105.13(e) and 105.151.*

PGE RESPONSE: PGE worked with the bridge manufacturer, ADM Welding & Fabrication, LLC, and their engineer, The Markosky Engineering Group, Inc., to evaluate each bridge location. Geotechnical information noted on the original borings were used in the evaluation completed by Markosky when the bridge plans were designed. Detailed bridge plans, including abutment and foundation design, are on sheets C931-C933 of the

project plan drawings. In addition, supporting calculations for the bridge designs have been uploaded to PADEP Greenport.

2. *Module S4 of the Environmental Assessment states that mitigation is required for 116.6 linear feet (LF) of permanent stream impacts. Review of the Compensatory Mitigation Summary Table (Table 8-4) indicates that mitigation is not being provided for the relocation of a portion of Stream 20230822-1412-JT, but no justification is provided so that the terms of 25 Pa. Code §105.13(e)(1)(ix) are not satisfied.*

PGE RESPONSE: PGE contracted LIVIC CIVIL to collect additional topographic survey data in this area, and CEC redesigned the road based on the new survey data to avoid realigning Stream S-20230822-1412-JT. No instream impacts on Stream S-20230822-1412-JT are proposed; therefore, compensatory mitigation for this stream is no longer necessary.

Additionally, LIVIC obtained survey-grade data for the existing DCNR Access Road and the culverts proposed for reclamation. Based on that survey, CEC determined that the proposed onsite stream restoration would total approximately 246.4 linear feet, which exceeds the amount identified in the previously denied application. As a result, the revised mitigation approach reduces the amount of offsite mitigation required. Further information on the Environmental Assessment and mitigation credits is available in the JPA permit.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.



Bethanie Hepner
Project Manager



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