



August 24, 2022

VIA EMAIL

Mr. Richard Watson
Project Manager
PennEnergy Resources, LLC
600 Cranberry Woods Drive, Suite 250
Cranberry Township, PA 16066

RE: PennEnergy Resources, LLC
Water Management Plan Amendment Application: Big Sewickley Creek

Dear Mr. Watson,

The Department has reviewed PennEnergy's July 15, 2022 Water Management Plan Amendment Application ("WMP Application") response to the Department's May 17, 2022 deficiency comments. In addition to the Department's review, on August 05, 2022 the Pennsylvania Fish and Boat Commission (PFBC) issued a new Species Impact Review ("SIR #56633") regarding the Potential Impact to PA Threatened species: Southern Redbelly Dace. The Department has identified the following outstanding deficiencies which must be included/addressed in the resubmittal of this WMP Application.

PennEnergy did not adequately address the May 17, 2022 Comment 1a, Comment 1b, and or Comment 6.

Comment 1a: The Department requested that PennEnergy justify ADF of Big Sewickley Creek and determine the most protective passby flow rate. The representative historic data that was provided and utilized does not represent the most protective passby flow rate for Big Sewickley Creek.

The PFBC's recommendation of applying the Tennant Method to instream flow estimates provided by the USGS StreamStats for Big Sewickley Creek provides the most protective passby flow rate for this withdrawal location. Update the WMP Application to follow the recommendation's outlined in SIR # 56633.

Comment 1b: PennEnergy did not address how taking greater than 10% of the ADF is protective of both instream flows and low flows.

Update the WMP Application to address that taking greater than 10% of the ADF is protective of both instream and low flows. 25 Pa. Code §78a.69 (b)

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Comment 6: A downstream gage needs to be installed and evidence of calibration needs to be submitted prior to approval of the WMP Application. The Withdrawal Impact Analysis also needs updated to address the monitoring frequency of the downstream staff gage. 25 Pa. Code § 78a.69 (e) (2)

Update the WMP Application to document that a downstream gage was installed, and calibrations have been started.

All outstanding deficiencies must be submitted to the Department within sixty (60) calendar days from the date of this letter, on or before October 23, 2022, or Department will consider the WMP Application withdrawn.

Thank you.

Sincerely,



Samantha Lutz
Aquatic Biologist, PA DEP

cc: B. Bailey
K. Milcic
M. Stephan

P. Martin (Moody)