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May 2, 2023

Sent via e-mail

Samantha Lutz
Oil and Gas Operations District
Southwest Regional Office
Pennsylvania Department of Environmental Protection
400 Waterfront Dr
Pittsburgh, PA 15222

RE: PennEnergy Resources, LLC
Southwest Pennsylvania Water Management Plan
for Unconventional Shale Gas Well Development
Economy Borough, Beaver County

Ms. Lutz:

The attached information is being re-submitted on behalf of:

PennEnergy Resources, LLC
Attn: Richard M. Watson

Please find attached a copy of the PennEnergy Resources, LLC Water Management Plan Application for Unconventional Shale Gas Well Development in the Pennsylvania Department of Environmental Protection (PADEP) Southwest Region: Big Sewickley Creek. This copy of the complete revised application is being submitted in response to the comments following the review provided by the PADEP on April 19, 2023 via email. The comments, with responses in italics, are provided below. The responses below are also reflected in the application.

Comment 1: On March 31, 2023, U.S. Fish and Wildlife Service listed the northern long-eared bat (*Myotis septentrionalis*) as endangered. To ensure the application is in compliance with the Endangered Species Act, the Department request that all pending projects submitted prior to March 31, 2023, be rescreened using the Pennsylvania Natural Diversity Index (PNDI) tool, and an updated PNDI Receipt be submitted. Please ensure that the Project Contact Information and Certification sections are completed on all submitted PNDI Receipts and that any new conservation/avoidance measures and or potential impacts are addressed. §105.13 (e); §105.16; §102.6(a)(2)

The project has been rescreened using the PNDI tool, and an updated PNDI receipt is included in ATTACHMENT G in the revised application dated May 2, 2023. The PNDI screening tool listed no known impacts to threatened and endangered species and/or special concern species and resources within the project area, and no further reviews required. However, previous correspondence with PA Fish and Boat Commission regarding the presence of and avoidance of impacts to the Southern Redbelly Dace are included in ATTACHMENT G and also addressed in the Withdrawal Impacts Analysis (ATTACHMENT J).

Comment 2: Update the Wetland Determination Report to account for the site visit that was conducted on January 25, 2023 to assess the conditions of Big Sewickley Creek at the newly proposed withdrawal location. Additional photographs documenting the current conditions of the stream and surrounding upland areas at the new withdrawal point should also be included. §105.13 (e) (1) (iv)

The Wetland Determination Report has been updated, including the addition of additional photographs. It is included as ATTACHMENT K.

Comment 3: The elevation table on Operations Plan drawing JP01 accounts for the full intake size of 19 inches instead of the 10 inches that will be submerged below the water surface within the “Separation from Strainer” column. Please update the table accordingly.

The table on Operations Plan drawing JP01 has been updated to reflect the intake submerged depth of 10 inches.

Comment 4: Update the elevation table on Operations Plan drawing JP01 to include the pool depth associated with each cross-section and required flow rate.

The table on Operations Plan drawing JP01 has been updated to include the pool depth associated with each cross-section and required flow rate.

Comment 5: If any additional upstream and or downstream discharge data has been collected since the March 09, 2023 response, please update the Stream Gage Calibration Report within Attachment B of the WMP application accordingly.

The Stream Gage Calibration report has been updated to include an additional seven measurement events conducted since the submission of the March 9, 2023 WMP.

Please feel free to contact me by email or phone at 814-724-4970 with any questions you may have.

Sincerely,
Moody and Associates, Inc.

A handwritten signature in black ink, appearing to read "Paul J. Martin". The signature is fluid and cursive, with the first name "Paul" being the most prominent.

Paul J. Martin, P.G.

PMartin@moody-s.com