



November 8, 2021  
Project C160860.03

Ms. Rebecca Albert, P.G.  
Pennsylvania Department of Environmental Protection  
Regional Permit Coordination Office  
400 Market Street  
10<sup>th</sup> Floor Rachel Carson State Office Building  
Harrisburg, PA 17101

**DEP File No. ESG830021001-00**  
**ESCGP-3**  
**National Fuel Gas Supply Corporation**  
**2021 FM120 Insertion Project**  
**Cameron, Elk, and Mckean Counties, Pennsylvania**

Dear Ms. Albert:

GAI Consultants, Inc. (GAI), on behalf of National Fuel Gas Supply Corporation (National Fuel), is providing the additional information necessary to complete the Erosion and Sediment Control General Permit (ESCGP-3) application for the 2021 FM120 Insertion Project (Project), as outlined in the letter provided by the Pennsylvania Department of Environmental Protection (PADEP) on May 11, 2021. For ease of review, your comments are provided below in italics with our responses following each statement.

As discussed with the PADEP Regional Permit Coordination Office on September 1 and September 17, 2021, National Fuel had intended to supplement pipeline and right-of-way (ROW) survey information with line pigging results in an effort to reduce uncertainty with regards to areas that may preclude pipeline insertion (thus requiring traditional trench installation) or require additional bell holes and areas of Construction LOD. However, the Project pigging is still ongoing; therefore, National Fuel has adjusted the Construction LOD in areas where it is anticipated that insertion will not be feasible and plans for open cut installation at 11 short segments of the pipeline. Following the results of the pipeline and ROW survey, National Fuel has also revised the overall LOD to reflect slight shifts in the existing pipeline alignment and ROW identified during the survey, as well as reduced and/or removed staging areas. National Fuel has included areas of Construction LOD where ROW maintenance (tree clearing) would be required due to encroachment. National Fuel has also added two construction yards which will be utilized during construction. Additional discussions and depiction of these updates are included herein.

Erosion and Sediment (E&S) Control Plan – All Counties

*Comment 1: The NOI Section F E&S Control Plan and the E&S Report Section 7 states that wetland crossings with no standing water or saturated soils will not require the use of timber mats. To minimize resource impact, mats should be used at all crossings, regardless of the initial saturation. Please revise and ensure consistency with the 105 application materials. [25 PA Code § 102.4(b)(4)(ii)].*

Response 1: National Fuel intends to install timber mats within the Construction LOD at all streams and wetlands anticipated to be crossed by travel lanes to access bell holes, crossed for ROW maintenance, or crossed in association with areas anticipated for open cut pipeline replacement. Wetland areas located within the Construction LOD not depicting timber mats will be avoided by proposed travel lanes and no earth disturbance is proposed at these features. Anticipated travel lanes are shown on the E&SCP Drawings. Wetlands and streams within the Permitted LOD/ ESCGP-3 Boundary not depicting timber mats are planned for pipeline insertion areas only and would not require earth disturbance or equipment crossing.

The updated E&SCP is provided as **Attachment 1** (including and E&SC and PCSM/SR Plan Drawings).

*Comment 2: The NOI Section E Project Information and the E&S Report Section 1.2 states that the entire right of way (ROW) is being permitted in case additional insertion locations are needed and that National Fuel intends to install proper best management practices (BMPs) to minimize erosion. If additional disturbance and BMPs are needed, the District and Department need to be contacted to determine if a redline or amendment is required. Please revise to reflect this process. [25 PA Code § 102.6(a)(1)].*

*Response 2: National Fuel has revised the Project LOD to reflect slight shifts in the existing pipeline alignment and ROW as a result of field survey, as well as LOD adjustments to further reduce uncertainty associated with pipeline insertion into the existing pipeline. To reduce this uncertainty, National Fuel has included additional areas of Construction LOD that include travel lanes, bell holes, open cut replacement segments, a contractor yard, and ROW maintenance. Streams crossed by the proposed open cut replacement segments would utilize a dam and pump bypass and wetlands would be crossed via open cut. Areas beyond the Construction LOD but within the Permitted LOD are being permitted for pipeline insertion only and would not require earth disturbance or equipment crossing. Due to these LOD adjustments, National Fuel no longer anticipates construction changes, earth disturbance or surface impacts to aquatic resources beyond the Construction LOD. Should unforeseen circumstances arise, National Fuel would notify and request prior written approval from the Department for earth work outside the Construction LOD. The Project's updated E&SCP (**Attachment 1**) outlines provisions for minimizing E&S within the Construction LOD during soil disturbance activities, protecting environmental resources during construction, and restoring the Project area following construction.*

*Comment 3: Riparian forest buffers need to be identified on the Erosion and Sedimentation Control Plan Drawings. Please revise. [25 PA Code § 102.4(b)(5)(xv)].*

*Response 3: Riparian buffers were previously identified on the drawings. The legend has been revised to identify these areas as "riparian forest buffers".*

*Comment 4: Please include the following items in the E&S Plan Drawings:*

*a. All existing and proposed waterbars within and tributary to the limits of disturbance. [25 PA Code § 102.4(b)(5)(ix)].*

*b. Utility lines and poles that are within or adjacent to the limit of disturbance. Those missed include, but are not limited to, lines for E&S Drawing Sheets #24/25, #26, #28, and poles at the south side of SR 120 (2), the north side of SR 120 (1) on Sheet #26, and the pole within the LOD south of Beechwood Road on Sheet 25. [25 PA Code § 102.4(b)(5)(ix)].*

*Response 4a: National Fuel will restore existing waterbars and install new waterbars, as necessary. Known existing waterbars and proposed temporary waterbars, where necessary, were added to the drawings.*

*Response 4b: The requested overhead electric lines and utility poles have been surveyed and are now shown on the ESCP and PCSM drawings.*

*Comment 5: The rock stockpiles for several of the rock construction entrances (RCEs) are in the middle of the access road and would block travel. Please revise the plans, locating the rock stockpiles in locations where they will accommodate the construction vehicle traffic. Examples include but are not limited to E&S Drawing Sheets #25/26 at the Truman Road and SR 120. [25 PA Code § 102.4(b)(5)(ix)].*

*Response 5: Rock stockpiles for RCEs have been adjusted so that they do not inhibit travel, while still being accessible for RCE maintenance. Based on a conference call with RPCO on 6/9/21, NFG added a note to the drawings that RCE will be limited where travel in and out one time is*

required. RCE only anticipated in areas where multiple mobilizations in and out of the construction LOD are required.

- Comment 6:* Several areas show an Erosion Control Blanket (ECB) proposed in work areas that do not have an RCE access or an indication of the nature of the disturbance. An example is the southern side of Shawmut Grade Rd. Please clarify the plan for these areas and revise as necessary. [25 PA Code §102.4(b)(5)(ix)].
- Response 6:* Based upon conversations during a meeting with RPCO on September 17, 2021, notes have been added to the drawings to reflect the fact that RCE installation will be limited where travel in and out one time is required. RCEs are only anticipated in areas where multiple mobilizations in and out of the construction LOD are required. Work areas have been updated to include RCEs where the limit of disturbance adjoins an existing road; however, the above comment applies.
- Comment 7:* Please clarify the direction of travel within the travel lanes. Some lanes indicate both directions, while some indicate only one direction and do not provide for an exit route. Please revise. [25 PA Code §102.4(b)(5)(ix)].
- Response 7:* Travel lanes, which are anticipated to require bidirectional travel, have been displayed on the revised ESCP Drawings.
- Comment 8:* Compost filter socks are proposed across travel lanes. Please clarify how these will be maintained – to ensure they are put back in place after being moved for travel or that they will not be driven over. [25 PA Code §102.4(b)(5)(ix)].
- Response 8:* Compost filter socks will be removed daily from travel lanes during active construction and replaced at the end of each work day (see detail on Sheet 034 of the E&SCP Drawings). After construction activities have ceased in an area, compost filter sock will be added to the locations displayed on the E&SCP Plan Drawings, until final restoration has been achieved in that area.
- Comment 9:* In the E&S Report Section 3.2, soil use resolutions to limitations are vague using general phrases such as: “appropriate precautions,” “suitable precautions,” and “precautions should be taken” but do not specifically state what these precautions should be. Resolutions were not provided in Table 1 Soil Series and Limitations. Please revise to clarify how the limitations will be addressed. [25 PA Code §102.4(b)(5)(vi)].
- Response 9:* Additional language has been added to the E&S Narrative (see Table 1A) as well as added to the E&SCP Drawings on Sheet 034.
- Comment 10:* E&S Report Section 3.2 also mentions that the segregation of topsoil will be done in residential and agricultural areas. Topsoil in wetlands also needs to be segregated, please revise, and indicate how excavated wetlands will be restored. [25 PA Code §102.4(b)(5)(ix)].
- Response 10:* E&S Narrative Section 3.2 has been revised to reflect the fact that wetland topsoil will require separating. Wetlands will be restored in accordance with the PADEP E&S Manual.
- Comment 11:* E&S Report section 8.2 mentions that a Topsoil Segregation Detail is included in the Detail Sheets; however, this is not included. Please revise. [25 PA Code §102.4(b)(5)(ix)].
- Response 11:* A topsoil segregation detail has been included in the ESCP details, see Sheet 034 of the ESCP.
- Comment 12:* Please consolidate the wetland crossing details in the E&S Plans. The primary section for Wetland Crossings is on Sheet #31; however, the timber mat detail Figure 3.7 for wetland crossings is on the previous Sheet. Also, the associated E&S BMP Phasing Detail is in a separate section on Sheet #30 and it is not clearly labeled to indicate it is for the phasing of resource crossings. [25 PA Code §102.4(b)(5)(ix)].

Response 12: The wetland crossing details have been consolidated on Sheet 031 of the ESCP drawings. The E&S BMP phasing detail has been renamed to clarify that it is for resource crossings.

Comment 13: *In the review of the E&S details, it appears that a detail depicting wetland excavation to construct a Bell Hole is missing. Please provide a construction detail for this activity to include required soil segregation for wetland excavation and where the excavated soil will be stockpiled. [25 PA Code §102.4(b)(5)(ix)].*

Response 13: The requested detail has been included on Sheet 033 in the ESCP details.

Comment 14: *The maintenance instructions should specify that inspections are to be logged onto DEP form 3800-FMBCW0271d (dated 5/2018) and are kept on-site at all times. [25 PA Code §102.11(a)(1)].*

Response 14: Section 11 of the E&S Narrative contains this information. No revision necessary.

Comment 15: *The federally listed invasive species Goatsrue was discovered within the project limit of disturbance (LOD) and notifications have been made. Please specify how this, and any other invasive species discovered will be addressed. [25 PA Code §102.4(b)(4)(ii)].*

Response 15: The staging area (and associated LOD) where the Goatsrue population was identified has been removed from the Project. In addition, equipment will be cleaned by the contractor before it is mobilized to the Project site. Excessive mud and debris will be removed from equipment before and after leaving or entering the ROW during construction.

#### PNDI

Comment 16: *The project as proposed will take place in State Game Lands 14 and 293 and State Forest Lands within Elk State Forest District. Per the response from DCNR (BOF) concerning PNDI receipt 709549 (Final\_1), it was requested that an invasive species survey be conducted pre-project in an email dated November 9, 2020. Please provide the DCNR clearance letter. [25 PA Code §102.6(a)(ii)].*

Response 16: Please find correspondence in **Attachment 2** from the Department of Conservation and Natural Resources, Bureau of Forestry, Elk State Forest District regarding National Fuel's compliance efforts.

Additionally, National Fuel has identified two areas planned to be used as contractor yards for the Project. The northern most contractor yard is a previously disturbed yard that had been used on National Fuel's YM28/FM120 project. The second southernmost yard is an existing gravel yard and no earth disturbance is proposed. Neither contractor yard will result in impacts to wetlands or streams. PNDI's were ran for both contractor yards on October 18, 2021, and no further review is required from all four agencies. Certified PNDI's are provided as **Attachment 3**. Results of environmental field reviews for the southern yard is included in the Supplemental Wetland Delineation and Stream Identification Report (WDSIR) provided as **Attachment 4**. Additionally, National Fuel is providing a Field Memo Report as **Attachment 5** documenting the results of environmental studies conducted at the northern contractor yard in 2019 for the National Fuel YM28/FM120 Project.

#### E&S Plan – Cameron County

Comment 17: *Please verify the plan for the Big Run crossing. It appears the forested riparian buffer will be cut down to accommodate the expanded workspace, which would require reforestation with native tree species upon restoration. Please verify if alternative crossings were considered. A site visit revealed evidence of a legacy crossing and access road approximately 10-20 feet west of the current crossing. This crossing location will minimize wetland impact, provide more space between the crossing and the high gradient slope, allowing additional space for installation of the crossing and Bell Hole #27A and their E&S controls. [25 PA Code § 102.4(c)].*

- Response 17: National Fuel's consultant (GAI Consultant's Inc.) met onsite with the Cameron County Conservation District on July 27, 2021, to evaluate the legacy crossing and access road. Utilization of the existing dirt road proposed by the District would require additional LOD 25-30 feet to the west of the proposed LOD to allow for road widening and would also require crossing Bull Run at a much wider area of the stream than is proposed. National Fuel has surveyed the existing treeline and adjusted/reduced the proposed LOD to avoid tree clearing within the riparian buffer. Depending on the ability for insertion at this location, National Fuel had included an option for open cut as part of this response. The proposed legacy crossing is not planned for use for this Project since National Fuel proposed to stay within their existing ROW. Additionally, National Fuel agrees to install temporary pipes beneath proposed timber mats as needed to allow flow through of wetland WPA-CDK-001 surface hydrology as per the Cameron County Conservation District's request.
- Comment 18: *It does not appear that there is sufficient room within the LOD at the rock construction entrance (RCE) off SR 120 on E&S Sheet #26 for the appropriate- sized sediment trap for treating the water from the wash rack as per Standard Detail 3-2 on E&S Sheet #30. Please revise or clarify how this will be implemented. [25 PA Code § 102.4(b)(5)(ix)]*
- Response 18: Additional space has been provided to incorporate a sediment trap for the wash rack.
- Comment 19: *The drawing details on Sheet #26 are crowded. Please include a separate sheet with a larger scale that focuses on Big Run Crossing, Bell Hole #27a, and the RCE on the east side of SR 120. Include the Existing Riparian Forest Buffer and the portion of this buffer that is planned to be cleared. [25 PA Code § 102.4(b)(5)(ix)].*
- Response 19: A 50-scale inset of this location has been added to Sheet 026. Existing treeline data has been added to the mapping to show the area to be cleared within the construction LOD.
- Comment 20: *The following discrepancies were noted on the plan drawings. Please revise. [25 PA Code § 102.4(b)(5)(ix)]*
- a. *The E&S Manual, page 273, and the Standard Note 31 in the Plan Drawings call for Erosion Control Mat to be used for restoration on slopes exceeding 3:1. Approximately 1000 feet of disturbed slope on the north side of Big Run has a gradient greater than 50% (2:1) and would require Erosion Control Fabric to be installed.*
  - b. *Compost filter sock (CFS) #80 is insufficiently sized for the length and gradient of the earth disturbance upslope from the CFS (1,050 feet long earth disturbance with >50% gradient) See Figure 4.2 on Sheet #29 for the appropriate size of CFS.*
  - c. *The Filter Sock on the SR120 South Bell Hole is insufficiently sized for the length of slope and gradient (230 feet long earth disturbance with 32% gradient) See Figure 4.2 on Sheet #29 for the appropriate size of CFS.*
- Response 20a: A note has been added to the E&S Drawings (see note 9), which states "In areas, where disturbance will occur, slopes greater than 3:1 require ECB."
- Response 20b: Revised E&S Drawings are included displaying existing and/or proposed waterbars in this location. CFS #80 is appropriately sized.
- Response 20c: Revised E&S Drawings are included displaying existing and/or proposed waterbars in this location. CFS #85 and #85A are appropriately sized.
- Comment 21: *The Cameron CCD has concerns over the expanded LOD for the workspace at Bell Hole #25. The LOD for the workspace extends onto an approximately 50% gradient slope where grubbing and clearing of trees would need to occur to accommodate the expanded workspace. This location is situated on Hartelton Channery Silt Loam 25%-60% slopes soils. This soil type has characteristics of low strength and is prone to landslide. It is presumed that excavated materials from Bell Hole #25 are planned to be stockpiled and/or equipment mobilized to work from the expanded workspace on this approximately 50% gradient slope.*

*Please clarify the intent and if the slope and soil type will support the construction activities. [25 PA Code § 102.4(b)(5)(ix)].*

Response 21: The LOD has been revised at this location to exclude expanded areas with steep slopes.

Comment 22: *During a field visit on April 19, 2021, indicators of wetlands at the following unmapped locations within and adjacent to the LOD were observed. Please verify these locations. [25 PA Code § 102.4(b)(5)].*

- a. *On the SR 120 South Access on the western edge of the LOD, E&S Sheet # 26.*
- b. *On the Southside of Beechwood Road in the center of the Pipeline ROW located at approximately 571+00 on E&S Sheet #25.*
- c. *Wetland indicators were found at the below locations on E&S Sheet #23. These wetland indicators were located adjacent to the FM 120 pipeline to the west where depressions were formed as a result of deep ruts from timber harvesting equipment. It appears that this timber harvest activity occurred shortly after the wetland delineation was conducted in 2016.*
  - i. *Within the expanded LOD for the workspace to the west of Bell Hole #23.*
  - ii. *On the western edge of the pipeline LOD, located to the north of Bell Hole #23 between the temporary logging road woodchip crossing of the pipeline and Bell Hole #23.*
  - iii. *Within the western limits of the expanded LOD at the infiltration berm.*

Response 22: A Supplemental WDSIR is provided as **Attachment 4** which addresses wetlands identified in these areas. No wetlands were identified on the eastern side of SR120 near proposed Bell Hole #28. Updated E&SCP Drawings are provided as **Attachment 1**.

Comment 23: *In the review of all drawings, it appears the Stream SPA-JJP-003 is depicted to begin directly outside of the LOD. A field visit revealed that this stream begins within the LOD. Please verify and update all Plans and Drawings.*

Response 23: Stream SPA-JJP-003 has been identified as SPA-CDK-002 in the Supplemental WDSIR (**Attachment 4.**) and it has been confirmed that the stream extends into the LOD. An updated Aquatic Resource Impact Table (ARIT) is included in the ESCP as **Attachment 1**. Updated E&SCP Drawings are provided as **Attachments 1**.

Comment 24: *In Section 10 Wetland Delineation & Stream Identification Report, Ditch 01 is listed in Table 4.2-2: Field Delineated Wetlands within the PSA and shown on Wetland & Waterbody Delineation Sheet 14 as a UNT to Big Run; however, this ditch is not on the E&S/PCSM Plan Drawings or Table 2 Summary of Waterbodies and Wetlands Crossed by the Project. Please update all documents to reflect the presence of Ditch 01 south of State Route 120 to the connection with Big Run and demonstrate that it will have appropriate protection. [25 PA Code §102.4(b)(4)(ii)].*

Response 24: Ditch 01 has been identified as SPA-CDK-003 and is included in the updated ARIT provided in the ESCGP as **Attachment 1**. Updated E&SCP Drawings are provided as **Attachment 1**.

#### E&S Plan – Elk County

Comment 25: *On E&S Sheet #11, compost filter sock #42 should be aligned more on the contour. [25 PA Code §102.11(a)(1)].*

Response 25: The drawing has been revised to address this comment.

*Comment 26: On E&S Sheet #5, at the northern end near "Match Line 004", there appears to be a wetland in the travel lane that does not have a crossing indicated. Please revise. [25 PA Code §102.4(b)(5)(ix)].*

*Response 26: This wetland was previously identified on sheet 004. It is now identified on sheet 005 as well.*

*Comment 27: On E&S Sheet #17, Bell Hole #18 and the CFS are proposed in the middle of TAR-10A. Please confirm that this is correct and the traffic considerations. [25 PA Code §102.4(b)(5)(ix)].*

*Response 27: Please refer to Response 8.*

*Comment 28: On E&S Sheet #11, please clarify why travel is proposed on the ROW between TAR-6 and TAR-13 when both roads have minor upgrades proposed. [25 PA Code §102.4(b)(5)(ix)].*

*Response 28: Travel will occur within the ROW at this location for the purpose of maintenance clearing.*

*Comment 29: On E&S Sheet #18, proposed Bell Hole #19, ECB is proposed on the opposite side of the road from the Bell Hole. Please clarify why this is being done. [25 PA Code §102.4(b)(5)(ix)].*

*Response 29: The reason for the ECB at this location was because of the proximity to the stream. The ROW is now planned to be traversed at this location; the ECB will remain.*

#### PCSM Plan

*Comment 30: In the NOI Section H.f Summary Description of PCSM/SR BMPs, the entry for the infiltration berm includes VC/RC/WQ; however, only one volume is listed. Both the 100-year/24-hour and the 2-year/24-hour should be listed. [25 PA Code § 102.6(a)(1)].*

*Response 30: The Summary Description Section in the NOI has been updated to include the 100- and 2-year/24-hour storm events.*

*Comment 31: Please clarify the approach for the waterbars and note areas where they are to be installed. The PCSM Report mentions they will be installed in accordance with the Detail Sheets; however, they are not shown on the Plan Sheets. [25 PA Code §102.8(f)(9)].*

*Response 31: Plan Sheets have been revised to include known existing and proposed waterbars.*

*Comment 32: Please add the following items to the infiltration berm construction sequence, both the Drawings and the Report [25 PA Code §102.8(f)(7)]:*

- a. The soil for berm fill should be added in 8-inch lifts and compacted after each addition, according to design specifications. The slope and shape of the berm should be graded out as soil is added.*
- b. Protect surface ponding area at the base of the berm from compaction. If compaction does occur, scarify soil to a depth of at least 8 inches.*

*Response 32: The above items have been added the infiltration berm construction sequence on the PCSM narrative and PCSM drawings.*

*Comment 33: Please distinguish between the infiltration berm construction sequence and the operation and maintenance of this BMP on the PCSM Plans, including when the licensed professional will be present. [25 PA Code §102.8(f)(7)].*

*Response 33: The infiltration berm construction sequence and operation and maintenance of the BMP, including when the licensed professional engineer will be present, have been included in the PCSM details.*

*Comment 34: The PCSM Plans only include sequencing and maintenance items for the infiltration berm. Please include these items for the right of way and other work areas. [25 PA Code §102.8(f)(7)]*

- Response 34:** Find ROW and work space sequencing and maintenance in E&S Narrative. At the Site Restoration Phase, there is no proposed maintenance for the ROW nor additional work spaces.
- Comment 35:** *Please clarify how the pipeline will be evaluated for restoration to ensure proper decompaction and soil conditions for vegetation. Will an Environmental Inspector be hired to review this component? [25 PA Code §102.8(a)(7)]*
- Response 35:** A full-time Environmental Inspector will be contracted by National Fuel for the duration of construction of the Project. The Environmental Inspector will also be responsible for completed required inspections until closure of the permit.
- Comment 36:** *Please clarify how the non-structural BMPs checked on Worksheet #10 will be incorporated into the project. These do not appear to have been included in the PCSM Report and are not in Section 7 Location and Type of BMPs. [25 PA Code §102.8(f)(5)].*
- Response 36:** In order to minimize total disturbed areas, the LOD for this project is the least amount of disturbance required for this maintenance project. Protection and utilization of natural drainage features is accomplished by limiting the impacts at crossings to the greatest extent practicable and disturbing the least amount of ground as practicable. Low impact equipment will be utilized as much as practicable, which will act to minimize soil compaction. These notes have been added to the requested sections.

National Fuel and GAI thank you in advance for your review. Please feel free to contact Bryce Good at 570.319.4707, or at [b.good@gaiconsultants.com](mailto:b.good@gaiconsultants.com) if there are any questions or concerns.

Sincerely,

**GAI Consultants, Inc.**



Digitally signed by Angela M. Lundy  
DN: cn=Angela M. Lundy,  
email=a.lundy@gaiconsultants.com  
Date: 2021.11.08 11:45:28  
-05'00'

Angela M Lundy, MPA  
Project Manager

Attachments: Attachment 1 (ESCP, E&S drawings, PCSM/SR drawings), Attachment 2 (DCNR Correspondence), Attachment 3 (PNDI Receipts), Attachment 4 (Supplemental Wetland Delineation and Stream Identification Report), and Attachment 5 (Field Memo Report)

cc: Mr. Daniel Young, National Fuel Gas Supply Corporation

**ATTACHMENT 1**  
**ESCP, E&S DRAWINGS, PCSM/SR DRAWINGS**

**Under Separate Cover**

**ATTACHMENT 2**  
**DCNR CORRESPONDENCE**

## Angela Lundy

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**From:** Sidelinger, Andrew J <asidelinge@pa.gov>  
**Sent:** Friday, October 1, 2021 5:05 AM  
**To:** Angela Lundy; Josh Sabo  
**Cc:** Dan Young; Eric Lynde; Jason Palonis; Kellert, Joseph G  
**Subject:** RE: [External] RE: NFG FM-120 South Modernization / Insertion Invasive species list  
**Attachments:** dcnr\_invasive species list\_dynamic\_web 6-23-21.pdf; DRAFT\_NFG Supply FM -120 Modernization SOUTH Invasive Plant Management Plan 202x\_DRAFT.pdf; dcnr\_invasive species list\_dynamic\_web (Elk State Forest - annotated) 6-23-21.pdf; 709459\_Cameron\_Elk\_McKean\_NI\_jar (003\_Highlighted).pdf

**Importance:** High

**EXERCISE CAUTION: This is an External Email Message!**

*\*\*Think before clicking on links, opening attachments, or responding\*\**

Angela, Josh, Dan, and Eric,

This e-mail stands as the Department of Conservation and Natural Resources, Bureau of Forestry, Elk State Forest District's recognition of National Fuel Gas Supply's previous and ongoing efforts to comply with the recommended Elk State Forest communications and pre-construction invasive plant survey as noted in the PNDI #709459 clearance letter dated June 23, 2020 (attached and highlighted for reference) in association with the proposed FM-120 South Modernization / Insertion project. Both National Fuel Gas Supply and GAI Consultants have cooperated fully with all the aforementioned Department requests and have been in constant communication with the Department and the Elk State Forest District staff as we work through this phase of the project.

If you need any additional information in this regard please don't hesitate to contact me. Thanks as always for your time and ongoing cooperation with this project and NFG's other operations on the Elk State Forest District.

Have a great weekend,

Andy

**Andrew Sidelinger** / Forester - Oil and Gas Operations  
PA Department of Conservation and Natural Resources  
Bureau of Forestry / Elk State Forest  
258 Sizerville Road / Emporium, PA 15834  
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**From:** Sidelinger, Andrew J  
**Sent:** Friday, July 30, 2021 3:11 PM  
**To:** Angela Lundy <a.lundy@gaiconsultants.com>

**Cc:** Dan Young <YoungD@natfuel.com>; Josh Sabo <SaboJ@natfuel.com>; Jason Palonis <J.Palonis@gaiconsultants.com>; Cameron Krivich <C.Krivich@gaiconsultants.com>; Mong, David E (DCNR) <damong@pa.gov>; Kellert, Joseph G <jkellert@pa.gov>  
**Subject:** RE: [External] RE: NFG FM-120 South Modernization / Insertion Invasive species list

Angela,

Glad that I could help. Yes the color coding and list that you attached is correct in terms of relevance / importance. Let me know if you have any additional questions as they continue the survey and I will do my best to help / answer.

Have a great weekend,

Andy

**Andrew Sidelinger** / Forester - Oil and Gas Operations  
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**From:** Angela Lundy <[a.lundy@gaiconsultants.com](mailto:a.lundy@gaiconsultants.com)>  
**Sent:** Friday, July 30, 2021 11:15 AM  
**To:** Sidelinger, Andrew J <[asidelinge@pa.gov](mailto:asidelinge@pa.gov)>  
**Cc:** Dan Young <[YoungD@natfuel.com](mailto:YoungD@natfuel.com)>; Josh Sabo <[SaboJ@natfuel.com](mailto:SaboJ@natfuel.com)>; Jason Palonis <[J.Palonis@gaiconsultants.com](mailto:J.Palonis@gaiconsultants.com)>; Cameron Krivich <[C.Krivich@gaiconsultants.com](mailto:C.Krivich@gaiconsultants.com)>  
**Subject:** RE: [External] RE: NFG FM-120 South Modernization / Insertion Invasive species list

Hi Andy,

Thanks for taking some time today to discuss the progress with the invasive plant study and the limits for the study which will help us be more efficient in the field.

As we discussed, we will adjust our study to the following:

1. Focus on identifying Tier 1 invasives (i.e. yellow highlighted species). Keep an eye out for those in Tiers 2 and 3. As we discussed we will GPS locations for those in Tier 1, if others on the list are identified we will provide a description of the amount and location (i.e. moderate Crown-vetch along AR – 1, etc).

Can you confirm we have the correct list attached and the description below are accurate. The list by color can be interpreted / described as follows:

**Yellow**: These are the first tier, EDRR (Early Detection Rapid Response), or high priority species. If these are found the goal would be to jump on treatment and monitoring as soon as possible depending upon time of year. We don't want these species to get out of control!

**Green**: These are the second tier species. While these are important and can pose ecological threats they are not as high a priority as the tier one species.

**Pink** : These are the third tier species. While important some of these species have shown to not pose as severe an ecological threat or negative impacts as the previous two categories. Undoubtedly you will find these species and we can address them accordingly depending upon where they are in the landscape and to what extent they are present.

2. For the existing access roads, we will focus our study along the road edge vs. going out 50' from the running surface. We will focus on the immediate road edge but will look out for tell tale signs of the Tier 1 species and will spot check out 50' intermittently along the road.

Please let me know if we captured this correctly. We'll have field staff back out in the area on Monday. Thanks for your help!

Have a great weekend,

Angela

---

**From:** Sidelinger, Andrew J <[asidelinge@pa.gov](mailto:asidelinge@pa.gov)>

**Sent:** Friday, July 30, 2021 4:48 AM

**To:** Dan Young <[YoungD@natfuel.com](mailto:YoungD@natfuel.com)>

**Cc:** Josh Sabo <[SaboJ@natfuel.com](mailto:SaboJ@natfuel.com)>; Eric Lynde <[LyndeE@natfuel.com](mailto:LyndeE@natfuel.com)>; Angela Lundy <[a.lundy@gaiconsultants.com](mailto:a.lundy@gaiconsultants.com)>; Jason Palonis <[J.Palonis@gaiconsultants.com](mailto:J.Palonis@gaiconsultants.com)>; Mong, David E (DCNR) <[damong@pa.gov](mailto:damong@pa.gov)>; Kellert, Joseph G <[jkellert@pa.gov](mailto:jkellert@pa.gov)>

**Subject:** RE: [External] RE: NFG FM-120 South Modernization / Insertion Invasive species list

**EXERCISE CAUTION: This is an External Email Message!**

*\*\*Think before clicking on links, opening attachments, or responding\*\**

Dan,

Thanks for reaching out and requesting a meeting regarding the invasive species survey. Unfortunately I need to be in the field all day inspecting several projects. I am however available next week between 0700 and 1615 on Tuesday, Wednesday, and Thursday for such a meeting. Let me know what time and day in that window works best and we can discuss the survey.

Thanks and have a great weekend,

Andy

**Andrew Sidelinger** / Forester - Oil and Gas Operations  
PA Department of Conservation and Natural Resources  
Bureau of Forestry / Elk State Forest  
258 Sizerville Road / Emporium, PA 15834  
Phone: 814-486-3353, Ext. 117 / Fax: 814-486-5617  
E-mail: [asidelinge@pa.gov](mailto:asidelinge@pa.gov)

[www.dcnr.state.pa.us](http://www.dcnr.state.pa.us)

**ATTACHMENT 3**  
**PNDI RECEIPTS**

## 1. PROJECT INFORMATION

Project Name: **2021 FM120 Insertion Project- Contractor Yard South**

Date of Review: **10/18/2021 02:05:50 PM**

Project Category: **Energy Storage, Production, and Transfer, Energy Transfer, Pipeline (gas, oil) - service, replace existing line**

Project Area: **6.60 acres**

County(s): **Elk**

Township/Municipality(s): **ST MARYS**

ZIP Code:

Quadrangle Name(s): **SAINT MARYS**

Watersheds HUC 8: **Clarion**

Watersheds HUC 12: **Laurel Run Dam-Elk Creek**

Decimal Degrees: **41.453378, -78.557090**

Degrees Minutes Seconds: **41° 27' 12.1620" N, 78° 33' 25.5225" W**

## 2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	No Known Impact	No Further Review Required
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate no known impacts to threatened and endangered species and/or special concern species and resources within the project area. Therefore, based on the information you provided, no further coordination is required with the jurisdictional agencies. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

## 2021 FM120 Insertion Project- Contractor Yard South

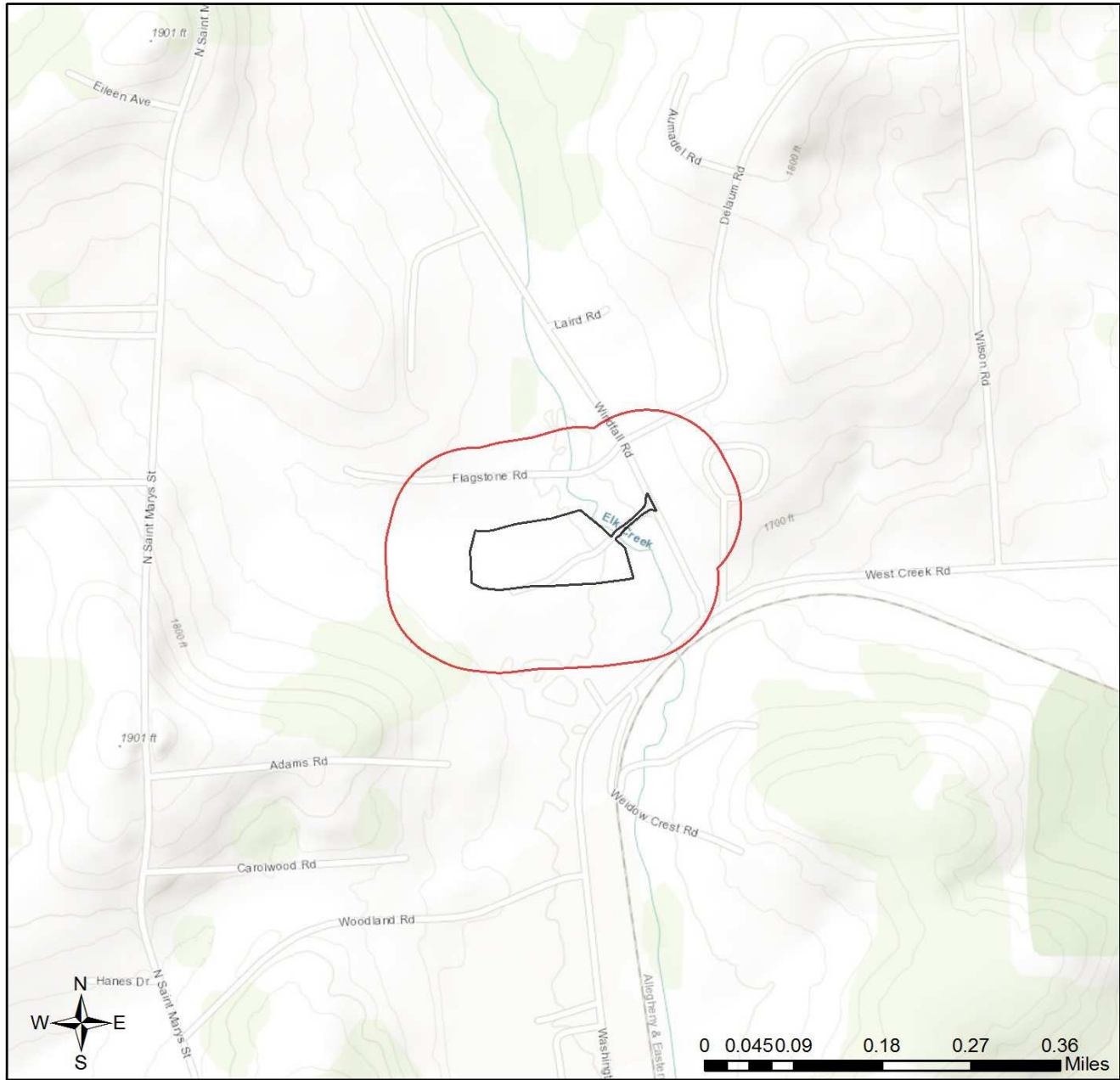


- Project Boundary
- Buffered Project Boundary

Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community  
Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community  
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China



## 2021 FM120 Insertion Project- Contractor Yard South



- Project Boundary
- Buffered Project Boundary

Service Layer Credits: Sources: Esri, HERE, Garmin, Intemap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



### 3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

#### PA Game Commission

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Fish and Boat Commission

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### U.S. Fish and Wildlife Service

##### RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

### 4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. Two review options are available to permit applicants for handling PNDI coordination in conjunction with DEP's permit review process involving either T&E Species or species of special concern. Under sequential review, the permit applicant performs a PNDI screening and completes all coordination with the appropriate jurisdictional agencies prior to submitting the permit application. The applicant will include with its application, both a PNDI receipt and/or a clearance letter from the jurisdictional agency if the PNDI Receipt shows a Potential Impact to a species or the applicant chooses to obtain letters directly from the jurisdictional agencies. Under concurrent review, DEP, where feasible, will allow technical review of the permit to occur concurrently with the T&E species consultation with the jurisdictional agency. The applicant must still supply a copy of the PNDI Receipt with its permit application. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. The applicant and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <https://conservationexplorer.dcnr.pa.gov/content/resources>.

## 5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page ([www.naturalheritage.state.pa.us](http://www.naturalheritage.state.pa.us)). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

## 6. AGENCY CONTACT INFORMATION

### PA Department of Conservation and Natural Resources

Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552  
Harrisburg, PA 17105-8552  
Email: [RA-HeritageReview@pa.gov](mailto:RA-HeritageReview@pa.gov)

### PA Fish and Boat Commission

Division of Environmental Services  
595 E. Rolling Ridge Dr., Bellefonte, PA 16823  
Email: [RA-FBPACENOTIFY@pa.gov](mailto:RA-FBPACENOTIFY@pa.gov)

### U.S. Fish and Wildlife Service

Pennsylvania Field Office  
Endangered Species Section  
110 Radnor Rd; Suite 101  
State College, PA 16801  
Email: [IR1\\_ESPenn@fws.gov](mailto:IR1_ESPenn@fws.gov)  
NO Faxes Please

### PA Game Commission

Bureau of Wildlife Habitat Management  
Division of Environmental Planning and Habitat Protection  
2001 Elmerton Avenue, Harrisburg, PA 17110-9797  
Email: [RA-PGC\\_PNDI@pa.gov](mailto:RA-PGC_PNDI@pa.gov)  
NO Faxes Please

## 7. PROJECT CONTACT INFORMATION

Name: Jason Palonis  
Company/Business Name: GAI Consultants  
Address: 200 Abington Executive Park  
City, State, Zip: Clarks Summit PA, 18411  
Phone: ( 570 ) 319-4713 Fax: (            )             
Email: j.palonis@gaiconsultants.com

## 8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.



Digitally signed by Jason J. Palonis  
Location: Clarks Summit PA  
Date: 2021.10.18 14:24:29-04'00'

10/18/2021

applicant/project proponent signature

date

## 1. PROJECT INFORMATION

Project Name: **2021 FM120 Insertion Project- Contractor Yard North**

Date of Review: **10/18/2021 02:15:50 PM**

Project Category: **Energy Storage, Production, and Transfer, Energy Transfer, Pipeline (gas, oil) - service, replace existing line**

Project Area: **3.70 acres**

County(s): **McKean**

Township/Municipality(s): **SERGEANT TOWNSHIP**

ZIP Code:

Quadrangle Name(s): **CROSBY**

Watersheds HUC 8: **Clarion; Upper Allegheny**

Watersheds HUC 12: **East Branch Clarion River-East Branch Lake Dam; Marvin Creek**

Decimal Degrees: **41.687264, -78.496852**

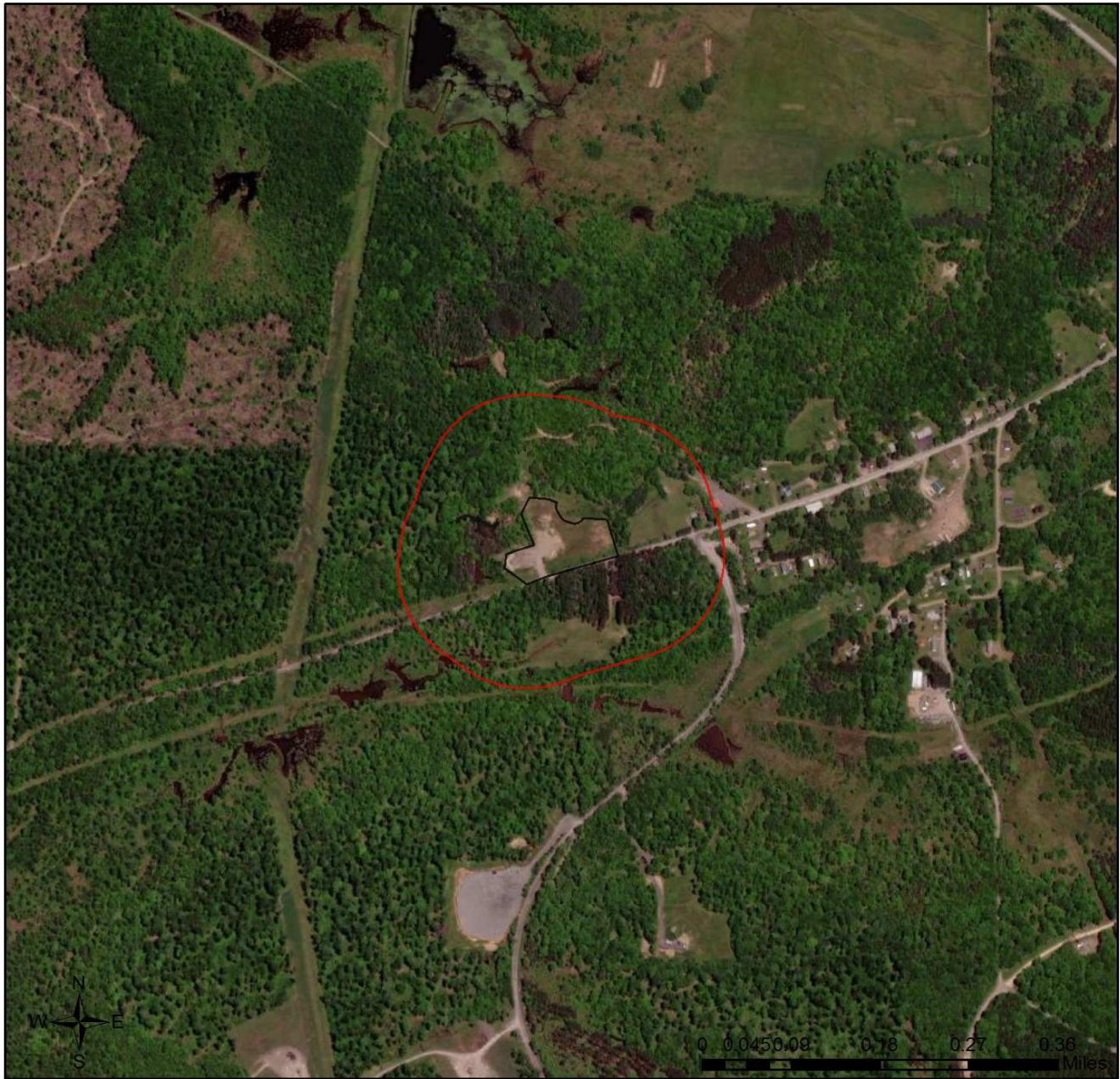
Degrees Minutes Seconds: **41° 41' 14.1503" N, 78° 29' 48.6677" W**

## 2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	No Known Impact	No Further Review Required
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate no known impacts to threatened and endangered species and/or special concern species and resources within the project area. Therefore, based on the information you provided, no further coordination is required with the jurisdictional agencies. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

## 2021 FM120 Insertion Project- Contractor Yard North

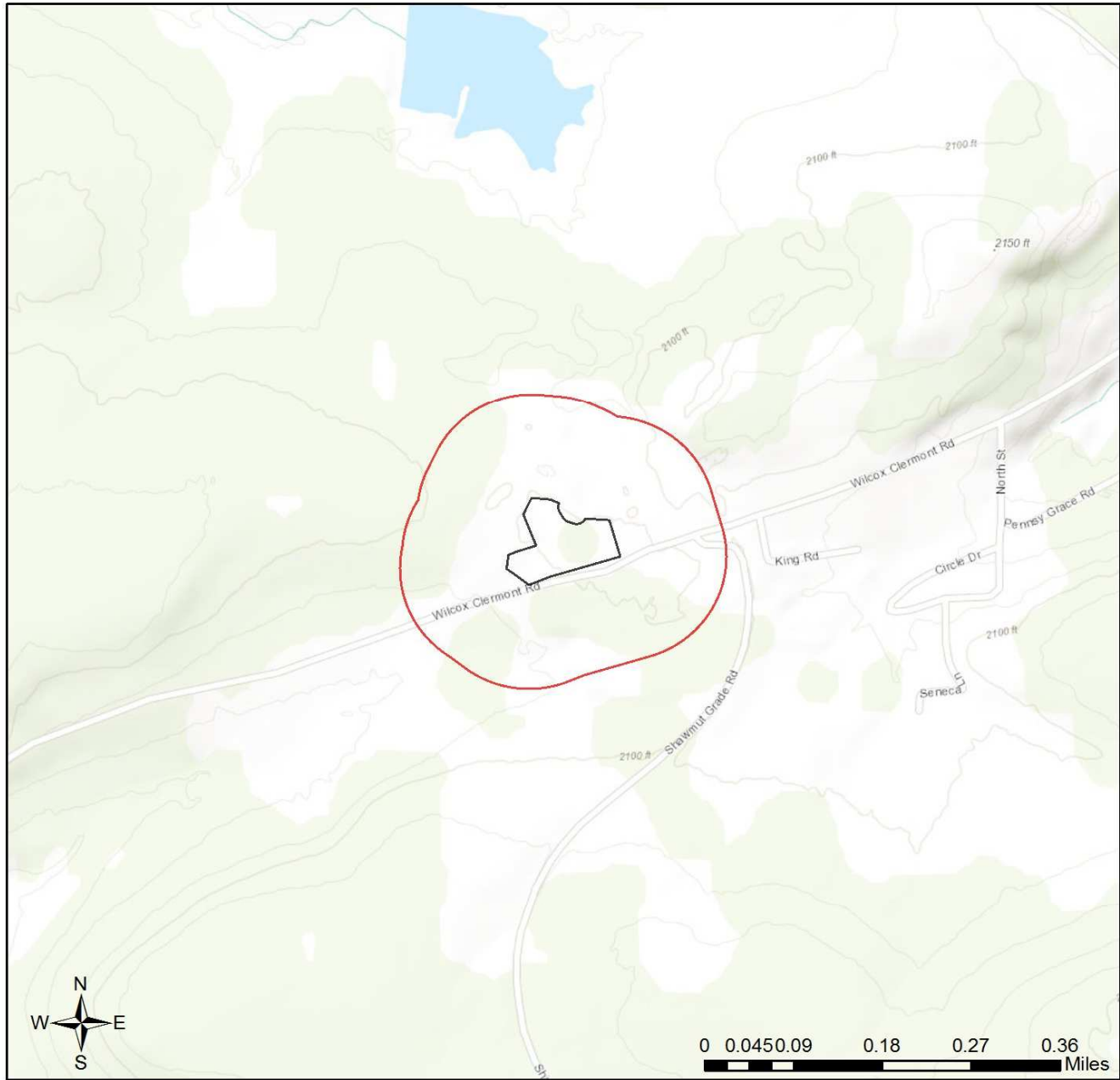


- Project Boundary
- Buffered Project Boundary



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community  
Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community  
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### 2021 FM120 Insertion Project- Contractor Yard North



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- Buffered Project Boundary

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### 3. AGENCY COMMENTS

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#### PA Game Commission

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### PA Department of Conservation and Natural Resources

##### RESPONSE:

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#### PA Fish and Boat Commission

##### RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

#### U.S. Fish and Wildlife Service

##### RESPONSE:

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## 6. AGENCY CONTACT INFORMATION

### PA Department of Conservation and Natural Resources

Bureau of Forestry, Ecological Services Section  
400 Market Street, PO Box 8552  
Harrisburg, PA 17105-8552  
Email: [RA-HeritageReview@pa.gov](mailto:RA-HeritageReview@pa.gov)

### PA Fish and Boat Commission

Division of Environmental Services  
595 E. Rolling Ridge Dr., Bellefonte, PA 16823  
Email: [RA-FBPACENOTIFY@pa.gov](mailto:RA-FBPACENOTIFY@pa.gov)

### U.S. Fish and Wildlife Service

Pennsylvania Field Office  
Endangered Species Section  
110 Radnor Rd; Suite 101  
State College, PA 16801  
Email: [IR1\\_ESPenn@fws.gov](mailto:IR1_ESPenn@fws.gov)  
NO Faxes Please

### PA Game Commission

Bureau of Wildlife Habitat Management  
Division of Environmental Planning and Habitat Protection  
2001 Elmerton Avenue, Harrisburg, PA 17110-9797  
Email: [RA-PGC\\_PNDI@pa.gov](mailto:RA-PGC_PNDI@pa.gov)  
NO Faxes Please

## 7. PROJECT CONTACT INFORMATION

Name: Jason Palonis  
Company/Business Name: GAI Consultants  
Address: 200 Abington Executive Park  
City, State, Zip: Clarks Summit PA, 18411  
Phone: (570) 319-4713 Fax: (    )       
Email: j.palonis@gaiconsultants.com

## 8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.



Digitally signed by Jason J. Palonis  
Location: Clarks Summit PA  
Date: 2021.10.18 14:25:57-04'00'

10/18/2021

applicant/project proponent signature

date

**ATTACHMENT 4**  
**SUPPLEMENTAL WDSIR**

**Under Separate Cover**

**ATTACHMENT 5**  
**FIELD MEMO REPORT**

# Field Report Memo

Date:	March 18, 2019
Project No./Name:	C160860.00, / NFG Y28/FM120 Project
Client Name:	National Fuel Gas Supply Corporation
Trip Purpose:	Review area for proposed laydown yard and conduct wetland delineation and stream identification within the study area as directed by the on-site client contact (Wayne Graham).
Trip Date(s):	March 15, 2019
Site Visit Personnel:	GAI – Jeff Polonoli
Client:	NFG Client Contact – Wayne Graham

## Summary of Events

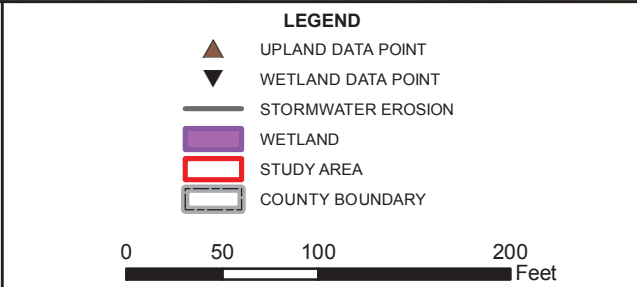
On March 15, 2018, Jeff Polonoli of GAI Consultants, Inc. (GAI) met the client contact, Wayne Graham on site of the proposed laydown yard in McKean County, Pennsylvania (PA). The primary task was to delineate a study area boundary of the proposed laydown yard as directed by the on-site client contact, and delineate existing environmental features within that study area and environmental features approximately 50 feet beyond the the study area boundary.

The specific site of the proposed laydown yard is an existing gravel lot that appears to have been recently used as a construction yard for an additional natural gas project within the local area. The previously disturbed portion of the existing gravel lot was outlined in degraded (ripped and overgrown with vegetation) erosional sock.

As instructed by Mr. Graham, the delineated study area boundary for the proposed laydown yard was established by taking GPS data points along the degraded erosion sock around the entire gravel lot.

One Paulustrine Emergent (PEM), isolated wetland was delineated within the north east end of the lot, abutting the study area boundary. The client explained that the final limit of disturbance would be able to remain at least 50 feet away from the wetlands' delineated boundary.

In addition, one stormwater erosional feature was delineated with the western section of the lot, just outside the study area boundary. The stormwater feature consisted of a riprap channel that was oriented to the open water area west of the lot as viewed on aerial mapping. The rip rap channel was completely dry and mostly vegetated with upland plant species at the time of survey, and no evidence of flow was observed within the channel.



**FIELD MEMO MAP**

YM28 AND FM120  
MODERNIZATION PROJECT  
NATIONAL FUEL GAS  
SUPPLY CORPORATION

DRAWN BY: SWW      DATE: 3/22/2019  
CHECKED: MDO      APPROVED: AML

Attachment A  
Wetland Data Forms

**WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont**

Project/Site: NFG Y28/FM120 City/County: McKean Sampling Date: 03/15/2019  
 Applicant/Owner: National Fuel Gas Supply Corporation State: PA Sampling Point: WPA-JJP-001  
 Investigator(s): Jeff Polonoli Section, Township, Range: No PLSS  
 Landform (hillslope, terrace, etc.): terrace-plain Local relief (concave, convex, none): concave Slope (%): <2  
 Subregion (LRR or MLRA): LRR N Lat: 41.687802 Long: -78.496618 Datum: NAD83  
 Soil Map Unit Name: HaB, Hartleton channery silt loam, 3-8 percent slopes NWI classification: none

Are climatic / hydrologic conditions on the site typical for this time of year? Yes  No  (If no, explain in Remarks.)  
 Are Vegetation , Soil , or Hydrology  significantly disturbed? Are "Normal Circumstances" present? Yes  No   
 Are Vegetation , Soil , or Hydrology  naturally problematic? (If needed, explain any answers in Remarks.)

**SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.**

Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Hydric Soil Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Remarks: - Area wetland sample point for wetland WPA-JJP-001. Isolated, PEM wetland.	

**HYDROLOGY**

<b>Wetland Hydrology Indicators:</b> <u>Primary Indicators (minimum of one is required; check all that apply)</u> <input checked="" type="checkbox"/> Surface Water (A1) <input type="checkbox"/> True Aquatic Plants (B14) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Saturation (A3) <input checked="" type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3) <input type="checkbox"/> Water Marks (B1) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Sediment Deposits (B2) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Drift Deposits (B3) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Algal Mat or Crust (B4) <input type="checkbox"/> Other (Explain in Remarks) <input type="checkbox"/> Iron Deposits (B5) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Water-Stained Leaves (B9) <input type="checkbox"/> Aquatic Fauna (B13)	<u>Secondary Indicators (minimum of two required)</u> <input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Sparsely Vegetated Concave Surface (B8) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Moss Trim Lines (B16) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Stunted or Stressed Plants (D1) <input checked="" type="checkbox"/> Geomorphic Position (D2) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> Microtopographic Relief (D4) <input type="checkbox"/> FAC-Neutral Test (D5)
<b>Field Observations:</b> Surface Water Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Depth (inches): <u>3 inches</u> Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <u>-</u> Saturation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <u>-</u> (includes capillary fringe)	Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:  
**N/A**

Remarks:  
 Surface water present within isolated depressions. Only possible source is precipitation.

**VEGETATION (Four Strata) – Use scientific names of plants.**

Sampling Point: WPA-JJP-001

	Absolute % Cover	Dominant Species?	Indicator Status	
<b>Tree Stratum</b> (Plot size: <u>30' r</u> )				<b>Dominance Test worksheet:</b>
1. Absent				Number of Dominant Species That Are OBL, FACW, or FAC: <u>2</u> (A)
2. _____				Total Number of Dominant Species Across All Strata: <u>2</u> (B)
3. _____				Percent of Dominant Species That Are OBL, FACW, or FAC: <u>100</u> (A/B)
4. _____				
5. _____				
6. _____				
7. _____				
8. _____				
	<u>0</u>	= Total Cover		
<b>Sapling/Shrub Stratum</b> (Plot size: <u>15' r</u> )				<b>Prevalence Index worksheet:</b>
1. Absent				Total % Cover of: _____ Multiply by: _____
2. _____				OBL species <u>0</u> x 1 = <u>0</u>
3. _____				FACW species <u>40</u> x 2 = <u>80</u>
4. _____				FAC species <u>40</u> x 3 = <u>120</u>
5. _____				FACU species <u>0</u> x 4 = <u>0</u>
6. _____				UPL species <u>0</u> x 5 = <u>0</u>
7. _____				Column Totals: <u>80</u> (A) <u>200</u> (B)
8. _____				Prevalence Index = B/A = <u>2.5</u>
9. _____				
10. _____				
	<u>0</u>	= Total Cover		
<b>Herb Stratum</b> (Plot size: <u>5' r</u> )				<b>Hydrophytic Vegetation Indicators:</b>
1. Juncus effusus	25	Y	FACW	<input type="checkbox"/> 1 - Rapid Test for Hydrophytic Vegetation
2. Dichanthelium clandestinum	20	Y	FAC	<input checked="" type="checkbox"/> 2 - Dominance Test is >50%
3. Scirpus cyperinus	10	N	FACW	<input checked="" type="checkbox"/> 3 - Prevalence Index is ≤3.0 <sup>1</sup>
4. Solidago rugosa	10	N	FAC	<input type="checkbox"/> 4 - Morphological Adaptations <sup>1</sup> (Provide supporting data in Remarks or on a separate sheet)
5. Cyperus strigosus	5	N	FACW	<input type="checkbox"/> Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
6. Rubus idaeus	5	N	FAC	<sup>1</sup> Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
7. Populus tremuloides	5	N	FAC	
8. _____				
9. _____				
10. _____				
11. _____				
12. _____				
	<u>80</u>	= Total Cover		
<b>Woody Vine Stratum</b> (Plot size: <u>30' r</u> )				<b>Definitions of Four Vegetation Strata:</b>
1. Absent				<b>Tree</b> – Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.
2. _____				<b>Sapling/Shrub</b> – Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1 m) tall.
3. _____				<b>Herb</b> – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.
4. _____				<b>Woody vine</b> – All woody vines greater than 3.28 ft in height.
5. _____				
6. _____				
	<u>0</u>	= Total Cover		
Remarks: (Include photo numbers here or on a separate sheet.)				<b>Hydrophytic Vegetation Present?</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
- None				

**SOIL**

Sampling Point: WPA-JJP-001

**Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)**

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>		
0-4	10YR 2/2	100					Hemic	
4-10	10YR 4/1	95	7.5 YR 3/4	5	C	M-PL	SiCL	
10-17	10YR 3/2	80	2.5Y 4/3	20	C	M	SiCL	

<sup>1</sup>Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.      <sup>2</sup>Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:		Indicators for Problematic Hydric Soils <sup>3</sup> :	
<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> Dark Surface (S7)	<input type="checkbox"/> 2 cm Muck (A10) (MLRA 147)	
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Polyvalue Below Surface (S8) (MLRA 147, 148)	<input type="checkbox"/> Coast Prairie Redox (A16) (MLRA 147, 148)	
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> Thin Dark Surface (S9) (MLRA 147, 148)	<input type="checkbox"/> Piedmont Floodplain Soils (F19) (MLRA 136, 147)	
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Loamy Gleyed Matrix (F2)	<input type="checkbox"/> Very Shallow Dark Surface (TF12)	
<input type="checkbox"/> Stratified Layers (A5)	<input checked="" type="checkbox"/> Depleted Matrix (F3)	<input type="checkbox"/> Other (Explain in Remarks)	
<input type="checkbox"/> 2 cm Muck (A10) (LRR N)	<input type="checkbox"/> Redox Dark Surface (F6)		
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Depleted Dark Surface (F7)		
<input type="checkbox"/> Thick Dark Surface (A12)	<input type="checkbox"/> Redox Depressions (F8)		
<input type="checkbox"/> Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)	<input type="checkbox"/> Iron-Manganese Masses (F12) (LRR N, MLRA 136)		
<input type="checkbox"/> Sandy Gleyed Matrix (S4)	<input type="checkbox"/> Umbric Surface (F13) (MLRA 136, 122)		
<input type="checkbox"/> Sandy Redox (S5)	<input type="checkbox"/> Piedmont Floodplain Soils (F19) (MLRA 148)		
<input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> Red Parent Material (F21) (MLRA 127, 147)		

<sup>3</sup>Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

<b>Restrictive Layer (if observed):</b> Type: <u>None</u> Depth (inches): <u>-</u>	Hydric Soil Present?    Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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Remarks:  
**- None**

**WETLAND DETERMINATION DATA FORM – Eastern Mountains and Piedmont**

Project/Site: NFG Y28/FM120 City/County: McKean Sampling Date: 03/15/2019  
 Applicant/Owner: National Fuel Gas Supply Corporation State: PA Sampling Point: WPA-JJP-001 UPL  
 Investigator(s): Jeff Polonoli Section, Township, Range: No PLSS  
 Landform (hillslope, terrace, etc.): Plain - terrace Local relief (concave, convex, none): none Slope (%): <2  
 Subregion (LRR or MLRA): LRR N Lat: 41.687743 Long: -78.496851 Datum: NAD83  
 Soil Map Unit Name: HaB, Hartleton channery silt loam, 3-8 percent slopes NWI classification: none

Are climatic / hydrologic conditions on the site typical for this time of year? Yes  No  (If no, explain in Remarks.)  
 Are Vegetation , Soil , or Hydrology  significantly disturbed? Are "Normal Circumstances" present? Yes  No   
 Are Vegetation , Soil , or Hydrology  naturally problematic? (If needed, explain any answers in Remarks.)

**SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.**

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Remarks: - Area upland sample point for wetland WPA-JJP-001.	

**HYDROLOGY**

<b>Wetland Hydrology Indicators:</b> <u>Primary Indicators (minimum of one is required; check all that apply)</u> <input type="checkbox"/> Surface Water (A1) <input type="checkbox"/> True Aquatic Plants (B14) <input type="checkbox"/> High Water Table (A2) <input type="checkbox"/> Hydrogen Sulfide Odor (C1) <input type="checkbox"/> Saturation (A3) <input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3) <input type="checkbox"/> Water Marks (B1) <input type="checkbox"/> Presence of Reduced Iron (C4) <input type="checkbox"/> Sediment Deposits (B2) <input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6) <input type="checkbox"/> Drift Deposits (B3) <input type="checkbox"/> Thin Muck Surface (C7) <input type="checkbox"/> Algal Mat or Crust (B4) <input type="checkbox"/> Other (Explain in Remarks) <input type="checkbox"/> Iron Deposits (B5) <input type="checkbox"/> Inundation Visible on Aerial Imagery (B7) <input type="checkbox"/> Water-Stained Leaves (B9) <input type="checkbox"/> Aquatic Fauna (B13)	<u>Secondary Indicators (minimum of two required)</u> <input type="checkbox"/> Surface Soil Cracks (B6) <input type="checkbox"/> Sparsely Vegetated Concave Surface (B8) <input type="checkbox"/> Drainage Patterns (B10) <input type="checkbox"/> Moss Trim Lines (B16) <input type="checkbox"/> Dry-Season Water Table (C2) <input type="checkbox"/> Crayfish Burrows (C8) <input type="checkbox"/> Saturation Visible on Aerial Imagery (C9) <input type="checkbox"/> Stunted or Stressed Plants (D1) <input type="checkbox"/> Geomorphic Position (D2) <input type="checkbox"/> Shallow Aquitard (D3) <input type="checkbox"/> Microtopographic Relief (D4) <input type="checkbox"/> FAC-Neutral Test (D5)
<b>Field Observations:</b> Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <u>-</u> Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <u>-</u> Saturation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): <u>-</u> (includes capillary fringe)	Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:  
N/A

Remarks:  
None observed

**VEGETATION (Four Strata) – Use scientific names of plants.**

WPA-JJP-001 UPL  
Sampling Point: \_\_\_\_\_

	Absolute % Cover	Dominant Species?	Indicator Status	
<b>Tree Stratum</b> (Plot size: <u>30' r</u> )				<b>Dominance Test worksheet:</b>
1. Absent				Number of Dominant Species That Are OBL, FACW, or FAC: <u>2</u> (A)
2. _____				Total Number of Dominant Species Across All Strata: <u>2</u> (B)
3. _____				Percent of Dominant Species That Are OBL, FACW, or FAC: <u>100</u> (A/B)
4. _____				
5. _____				
6. _____				
7. _____				
8. _____				
	<u>0</u>	= Total Cover		<b>Prevalence Index worksheet:</b>
<b>Sapling/Shrub Stratum</b> (Plot size: <u>15' r</u> )				<u>        </u> Total % Cover of: <u>        </u> Multiply by:
1. Absent				OBL species <u>0</u> x 1 = <u>0</u>
2. _____				FACW species <u>35</u> x 2 = <u>70</u>
3. _____				FAC species <u>40</u> x 3 = <u>120</u>
4. _____				FACU species <u>5</u> x 4 = <u>20</u>
5. _____				UPL species <u>15</u> x 5 = <u>75</u>
6. _____				Column Totals: <u>95</u> (A) <u>215</u> (B)
7. _____				Prevalence Index = B/A = <u>2.26</u>
8. _____				<b>Hydrophytic Vegetation Indicators:</b>
9. _____				<input type="checkbox"/> 1 - Rapid Test for Hydrophytic Vegetation
10. _____				<input checked="" type="checkbox"/> 2 - Dominance Test is >50%
				<input checked="" type="checkbox"/> 3 - Prevalence Index is ≤3.0 <sup>1</sup>
				<input type="checkbox"/> 4 - Morphological Adaptations <sup>1</sup> (Provide supporting data in Remarks or on a separate sheet)
				<input type="checkbox"/> Problematic Hydrophytic Vegetation <sup>1</sup> (Explain)
	<u>0</u>	= Total Cover		<sup>1</sup> Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
<b>Herb Stratum</b> (Plot size: <u>5' r</u> )				<b>Definitions of Four Vegetation Strata:</b>
1. <i>Dichanthelium clandestinum</i>	25	Y	FAC	<b>Tree</b> – Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.
2. <i>Rubus hispidus</i>	20	Y	FACW	<b>Sapling/Shrub</b> – Woody plants, excluding vines, less than 3 in. DBH and greater than 3.28 ft (1 m) tall.
3. <i>Juncus effusus</i>	15	N	FACW	<b>Herb</b> – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.
4. <i>Daucus carota</i>	15	N	UPL	<b>Woody vine</b> – All woody vines greater than 3.28 ft in height.
5. <i>Dichanthelium acuminatum</i>	5	N	FAC	
6. <i>Dryopteris intermedia</i>	5	N	FACU	
7. <i>Carex glaucoidea</i>	5	N	FAC	
8. <i>Solidago rugosa</i>	5	N	FAC	
9. _____				
10. _____				
11. _____				
12. _____				
	<u>95</u>	= Total Cover		
<b>Woody Vine Stratum</b> (Plot size: <u>30' r</u> )				
1. Absent				
2. _____				
3. _____				
4. _____				
5. _____				
6. _____				
	<u>0</u>	= Total Cover		<b>Hydrophytic Vegetation Present?</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Remarks: (Include photo numbers here or on a separate sheet.)				
- None				

**SOIL**

Sampling Point: WPA-JJP-001 UPL

**Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)**

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type <sup>1</sup>	Loc <sup>2</sup>		
0-6	10YR 3/3	95	7.5 YR 3/4	5	C	M	SiCL	
6-13	10YR 4/4	98	7.5 YR 3/4	2	C	M	SiCL	

<sup>1</sup>Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.      <sup>2</sup>Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:	Indicators for Problematic Hydric Soils <sup>3</sup> :
<input type="checkbox"/> Histosol (A1)	<input type="checkbox"/> 2 cm Muck (A10) (MLRA 147)
<input type="checkbox"/> Histic Epipedon (A2)	<input type="checkbox"/> Coast Prairie Redox (A16)
<input type="checkbox"/> Black Histic (A3)	<input type="checkbox"/> (MLRA 147, 148)
<input type="checkbox"/> Hydrogen Sulfide (A4)	<input type="checkbox"/> Piedmont Floodplain Soils (F19)
<input type="checkbox"/> Stratified Layers (A5)	<input type="checkbox"/> (MLRA 136, 147)
<input type="checkbox"/> 2 cm Muck (A10) (LRR N)	<input type="checkbox"/> Very Shallow Dark Surface (TF12)
<input type="checkbox"/> Depleted Below Dark Surface (A11)	<input type="checkbox"/> Other (Explain in Remarks)
<input type="checkbox"/> Thick Dark Surface (A12)	
<input type="checkbox"/> Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148)	
<input type="checkbox"/> Sandy Gleyed Matrix (S4)	
<input type="checkbox"/> Sandy Redox (S5)	
<input type="checkbox"/> Stripped Matrix (S6)	
<input type="checkbox"/> Dark Surface (S7)	
<input type="checkbox"/> Polyvalue Below Surface (S8) (MLRA 147, 148)	
<input type="checkbox"/> Thin Dark Surface (S9) (MLRA 147, 148)	
<input type="checkbox"/> Loamy Gleyed Matrix (F2)	
<input type="checkbox"/> Depleted Matrix (F3)	
<input type="checkbox"/> Redox Dark Surface (F6)	
<input type="checkbox"/> Depleted Dark Surface (F7)	
<input type="checkbox"/> Redox Depressions (F8)	
<input type="checkbox"/> Iron-Manganese Masses (F12) (LRR N, MLRA 136)	
<input type="checkbox"/> Umbric Surface (F13) (MLRA 136, 122)	
<input type="checkbox"/> Piedmont Floodplain Soils (F19) (MLRA 148)	
<input type="checkbox"/> Red Parent Material (F21) (MLRA 127, 147)	

<sup>3</sup>Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

<b>Restrictive Layer (if observed):</b> Type: <u>Gravel and cobble</u> Depth (inches): <sup>13</sup> <u>                    </u>	<b>Hydric Soil Present?</b> Yes <u>      </u> No <u>      </u>
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Remarks:  
 - Soil probably disturbed due to gravelly spoil at approximately 20% throughout profile

Attachment B  
Wetland Photographs

## Wetland Photographs



Wetland WPA-JJP-001, Facing North (3/15/19)



Wetland WPA- JJP -001, Facing South (3/15/19)



Wetland WPA- JJP -001, Facing East (3/15/19)



Wetland WPA- JJP -001, Facing West (3/15/19)