

Mileto, Chris S

From: Chambers, Erin
Sent: Wednesday, May 8, 2024 11:33 AM
To: nathanharris@penngeneralenergy.com; 'edougherty@beranenvironmental.com'; robertkuntz@penngeneralenergy.com
Cc: Harvey, Daniel (P.E.); Yeakel, Christopher (OG); Mileto, Chris S
Subject: Phase IV Pipeline

Good morning,

After reviewing the technical deficiency response for the above referenced project, the Department is requesting additional clarification on the following items:

1. A contingency item listed in a letter dated February 27, 2023 from the Pennsylvania Game Commission to the applicant states: *The Tiadaghton State Forest District will develop a planting plan for the Honniasont Phase IV pipeline corridor. PGE will complete the plantings at the earliest appropriate time. All plantings should follow the Pennsylvania Bureau of Forestry Planting and Seeding Guidelines as provided in the 4th Edition Revised 2016 Guidelines for Administering Oil and Gas Activity on State Forest Land. PGE is responsible for the protection of the tree seedlings as described in the planting plan and to maintain 70% survivability.* Is this planting plan for upland only areas, outside of Chapter 105 regulated resources crossings? Please provide a copy of the proposed planting plan. 105.13(e)(1)(ix)
2. Provide protective measures (e.g.- tree tubes, fencing, enclosures, etc.) for proposed tree and shrub plantings (wetland and riparian areas) to help promote success and survivability. 105.13(e)(1)(ix)
3. The Class A wild trout note is still missing from Table S.2.B. 1-5 and various tables in the Environmental Assessment Form. Ensure that all tables are updated to accurately reflect the Class A wild trout stream designation. 105.13(e)(1)(i)(A)
4. Section S3.D.2.IV of the Environmental Assessment should discuss impacts to public recreational areas associated with the proposed project and Section S3.G.1 should discuss direct and/or indirect impacts on adjacent lands (which would include areas around the project and areas adjacent thereto) associated with the proposed project. Include in this section a discussion on direct and indirect impacts to the Mid-State Trail and Bark Cabin Natural Area. These sections should include a discussion on impacts to recreational use, and impacts associated with the temporal loss of natural and aesthetic values associated with clearing of riparian buffer areas and/or having an open cleared right-of way. What is the expected timeframe between when the right-of-way will be re-planted, and the aesthetic and natural functions and values will be re-placed/re-established through the installation of the proposed right-of-way plantings? 105.13(e)(1)(x)
5. Provide additional details regarding Alternative 2 (Eastern; purple)- which states: Alternative 2 was not pursued past a desk top review. DCNR rejected this alternative as it drastically increased the disturbance on their property. How much additional disturbance is there to DCNR property? For a portion of this alternative, it appears that the route could follow an existing road (Hackett Road) on DCNR property before leaving DCNR property onto private property and PGC property. 105.13(e)(1)(viii)

6. Provide additional details regarding Alternative 3 (Black) Follow Electric ROW- which states: *This alternative was not pursued past a desktop review. The DCNR did not approve the cutting of a new corridor that bisected their property prior to following the electric ROW. The PGC did not approve the route due to the added disturbance on their property and due to the location of the pipeline. This route was also cost prohibitive to PGE; the length of this alternative was nearly twice the length of the selected route.* To connect to the black route, the route would need to follow the pink route first on a small portion of DCNR property, then continue on to private property (parcels not shaded as “no properties”), continues onto PGC property, following the boundary, prior to hitting the existing electric ROW (which also appears to be on private property parcel(s) also not shaded as “no properties”). The DCNR property begins again at the existing electric ROW at the location where it parallels Wolf Run Natural Area briefly and eventually goes back on to PGC property. Clarify how much more new disturbance is on DCNR property vs. private landowners and PGC. Additionally, provide details on the feasibility of collocating the pipelines within the existing electric ROW. 105.13(e)(1)(viii)

7. No permanent direct impacts are listed in the impact tables or were used to calculate the in lieu fee numbers. The pipe under the resource is considered a permanent direct impact. Provide clarification and appropriate revisions, as necessary. 105.13(e)(1)(x)

Please reach out if you have any questions.

Thanks,

Erin Chambers | Aquatic Biologist 2
Department of Environmental Protection | Eastern Oil and Gas District
Bureau of District Oil and Gas Operations
208 West Third Street Suite 101 | Williamsport PA 17701
Phone: 570.327.0524 | Fax: 570.327.3420
www.dep.pa.gov