

From: Mileto, Chris S <CMILETO@pa.gov>
Sent: Monday, March 9, 2020 9:34 AM
To: Michael Race <mrace@armgroup.net>; Scott Martin <smartin@armgroup.net>
Cc: Nathan R. Harris <nathanharris@penngeneralenergy.com>; Harvey, Daniel (P.E.) <daniharvey@pa.gov>; Gocek, Erin <egocek@pa.gov>
Subject: JPA E4129-133 Loyalsock/Shawnee Freshwater System - Additional Information

Loyalsock/Shawnee Freshwater System
PA General Energy Company, LLC
Client ID: 213205

JPA E4129-133
APS: 1009923
AUTH: 1302865

Mike:

The Department has determined that additional information and/or corrections must be provided in order to continue processing your permit applications.

Clarify and provide further information on the following:

1. §105.13(e)(1)(iii) Project Description.
 - a. The narrative states “The freshwater withdrawal system is temporary in nature” but plan drawings show the construction of a permanent facility. Please revise permit packages and several attachments accordingly to illustrate permanent withdrawal system.
 - b. The project description states “The temporary waterline will extend from proposed pump stations on both sides of Loyalsock Creek to the proposed impoundment site within Loyalsock State Forest” Plan sheets do not illustrate a TAGWL. Please clarify.
2. §105.13(e)(1)(iii)(B) Project Purpose.
 - a. Please provide additional discussions on the purpose and need for the utility trench/corridor.
3. §105.13(e)(1)(i) Site Plan.
 - a. Please provide utility trench/corridor detail illustrating all utilities
4. §105.13(e)(1)(viii). Alternative analysis
 - a. Please clarify, can the freshwater withdrawal system (FWS) be revised to an Above-Ground Temporary withdrawal minimizing the earth disturbance to Loyalsock Creek?
 - b. If the FWS can be above ground, can the utility trench corridor be eliminated until PGE has plans for future development of the west-side corridor?
 - c. Please provide detailed construction sequencing including construction duration for each phase of cofferdam installation. Provide additional discussions as to whether the cofferdam at freshwater system and Phase 1 utility trench can be combined to minimize impacts to the stream channel.
 - d. The project proposes a conventional bore under State Route 87. Provide discussion within the Antidegradation Analysis regarding the potential to utilize a conventional bore to cross Loyalsock Creek.

- e. Provide a more detailed alternative analysis that details alternate routes and/or alignments evaluated to avoid and/or minimize impacts to aquatic resources.
5. §105.13(e)(1)(ix). Mitigation plan.
 - a. Provide a discussion on the potential to reduce right-of-way width along utility corridor under Loyalsock Creek and riparian buffer area.
 - b. Plan sheets illustrate impacts to existing riparian forest buffer. Please provide a streambank restoration plan/riparian buffer planting plan detailing how minimal clearing and replanting will be implemented to protect the buffer to the extent practicable.
 6. §105.14(b)(2). Review of application.
 - a. Provide the Aids to Navigation System plan (ATONs) approval letter from PA Fish & Boat.
 7. §105.14(b)(4). Review of application.
 - a. Provide the Pennsylvania Historical and Museum Commission (PHMC) clearance letter
 - b. Provide the Susquehanna River Basin Commission (SRBC) approval letter and specifications
 - c. Provide an executed Submerged Lands License Agreement (SLLA)
 8. §105.161(a). Hydraulic capacity.
 - a. Project is located in a detail FEMA (zone AE) area. Please provide water surface elevations and velocities for the 2-yr, 10-yr, 25-yr and 100-yr storm events for each scenario: unrestricted flow, phase 1 – surface water withdrawal, phase 1 – with 7 ft. cofferdam and phase 2 – with 7 ft. cofferdam along with a discussion on whether specific construction sequencing will be utilized to address any concerns found in the analysis.
 - Please provide attached DEP impact table, in addition to the ARIT table.
 - Please revise the 102-permit package, plan sheet(s) and DEP impact table(s) accordingly.

Upon your request, the application will be returned to you for revisions and/or resubmittal.

Please note that a response fully addressing each of the technical deficiencies set forth above must be received within sixty (60) calendar days or DEP may consider the application to be withdrawn by the applicant.

Chris Mileto

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