Appendix D
Copies of Relevant Agency Correspondence

U.S. Fish and Wildlife Service

August 12, 2014

Mr. Robert Anderson
Endangered Species Program

U.S. FISH & WILDLIFE SERVICE
Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, PA 16801

Re: Large Project PNDI Review
PennEast Pipeline Company, LLC - PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania

Dear Mr. Anderson:

The PennEast Pipeline Company, LLC (PennEast), is a partnership with UGI Energy Services (UGIES), AGL Resources, NJR Pipeline Company, and South Jersey Industries. The PennEast Pipeline Project (Project) proposes to construct a new 100-mile, 30-inch pipeline to deliver natural gas from northeast Pennsylvania to other markets in Pennsylvania and New Jersey. This new supply of natural gas will bring lower cost supplies to residents and businesses in Pennsylvania and New Jersey, while enhancing pipeline system flexibility and reliability for the local gas utilities.

PennEast intends to file its certificate application for the PennEast Pipeline Project with the Federal Energy Regulatory Commission (FERC) in mid-2015, and anticipates receiving authorization and starting construction in 2017. Permit applications with other federal, state, and local agencies will be submitted within similar timeframes as the certificate application. The permit proceedings conducted by these agencies will provide additional opportunities for public input and involvement. FERC's determination of public convenience and necessity includes a thorough, comprehensive environmental review of proposed projects, working closely with federal, state, and local agencies and in accordance with the National Environmental Policy Act (NEPA).

On behalf of PennEast, URS Corporation (URS) is requesting a Large Project Pennsylvania Natural Diversity Inventory (PNDI) review update for rare, candidate, threatened, and endangered species under the jurisdiction of the United States Fish and Wildlife Service (USFWS) for the PennEast Pipeline Project. A critical issues analysis was conducted for multiple routes using readily available secondary source data to select the **Least**

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
Fax: 610.832.3501

Environmentally Damaging Practicable Alternative (LEDPA) route. Mapping depicting the environmental features evaluated for the preferred alternative is enclosed. We are asking for your review prior to the initiation of wetland and watercourse field surveys to be conducted this fall. We hope to concurrently identify any habitat for species under your agencies' jurisdiction at this time. The environmental study area will be a 400-foot corridor centered on the approximately 100-mile alignment. The anticipated permanent right-of-way (ROW) and temporary construction work area will be approximately 100-feet. The study area is wider than the disturbance area to allow for minor alignment shifts to avoid any sensitive resources that may be identified during the environmental field investigations.

The following are enclosed to facilitate your review:

- Large Project PNDI Form;
- PennEast Project Fact Sheet; and
- CD containing:
    - shapefiles of the alignment;
    - USGS 7.5 minute quadrangle maps with project alignment; and
    - detailed maps depicting the project areas and known secondary source resources

If you have any questions or require additional information regarding this request, please contact me at 610.832.1810 or bernard.holcomb@urs.com.

Sincerely,

Bernard Holcomb
Pipeline Environmental Services Manager
Enclosures (3)

cc: Mr. Anthony Cox (UGI)
Mr. Dante D'Alessandro (UGI)

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United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pennsylvania Field Office
315 South Allen Street, Suite 322
State College, Pennsylvania 16801-4850

September 30, 2014

Bernard Holcomb
URS Corporation
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

RE: USFWS Project #2014-1013

Dear Mr. Holcomb:

This responds to your letter dated August 12, 2014, requesting information about federally listed and proposed endangered and threatened species within the area affected by the proposed 100-mile, 30-inch PennEast natural gas pipeline project located in Luzerne, Carbon, Northampton, and Bucks counties, Pennsylvania. The following comments are provided pursuant to the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) to ensure the protection of endangered and threatened species and the Migratory Bird Treaty Act (16 U.S.C. 703-712; Ch. 128; July 13, 1918; 40 Stat. 755, as amended), and the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended; 16 U.S.C. 668-668d) to ensure the protection of migratory bird species.

Indiana bat

The project is within the range of the Indiana bat (*Myotis sodalis*), a species that is federally listed as endangered. Indiana bats hibernate in caves and abandoned mines during the winter months (November through March), and use a variety of upland, wetland and riparian habitats during the spring, summer and fall. Indiana bats usually roost in dead or living trees with exfoliating bark, crevices or cavities. Female Indiana bats form nursery colonies under the exfoliating bark of dead or living trees, such as shagbark hickory, black birch, red oak, white oak, and sugar maple, in upland or riparian areas.

Land-clearing, especially of forested areas, may adversely affect Indiana bats by killing, injuring or harassing roosting bats, and by removing or reducing the quality of foraging and roosting habitat. Therefore, to determine whether the proposed project will affect Indiana bats, we will need additional project information, including site plans and a detailed project description, that describe how much forest disturbance will occur (area, tree species, and size classes).

Additionally, your project is located within the range of the federally proposed endangered northern long-eared bat (*Myotis septentrionalis*). The northern long-eared bat was proposed for listing as an endangered species on October 2, 2013. No critical habitat has been proposed at this time. Species proposed for listing are not afforded protection under the ESA; however, as soon as a listing becomes effective, the prohibition against jeopardizing its continued existence and "take"[1] applies **regardless of an action's stage of completion**. Therefore, to avoid project delays we recommend that the effect of the project on northern long eared bats, and their habitat, be considered during the project planning and design. Additional information about northern long-eared bats, including ecology, habitat descriptions, listing status updates, and possible conservation measures may be found at *www.fws.gov/midwest/endangered/mammals/nlba/index.html* (click on Northern Long-eared Bat Interim Conference and Planning Guidance). We are available to discuss potential conservation measures specific to your project design.

Northeastern bulrush

The project area is within the known range of the northeastern bulrush (*Scirpus ancistrochaetus*), a federally listed, endangered plant. Potential habitat for this species could be affected if the project will directly or indirectly affect wetlands within Carbon County. The northeastern bulrush is typically found in ponds, wet depressions, shallow sinkholes, vernal pools, small emergent wetlands, or beaver-influenced wetlands. These wetlands are often located in forested areas and characterized by seasonally variable water levels at elevations of 1300 feet and greater.

To conserve northeastern bulrush (if present) and other wetland-dependent species of concern, project-related activities should avoid adversely affecting the surface and groundwater recharge areas. This would include establishment of 300-foot wide upland buffer areas around wetlands, as well as 50 to 100 foot wide buffers along waterways (perennial and intermittent rivers, streams, creeks and tributaries). When adequately vegetated, these buffers will act to filter pollutants and stabilize streambanks. Earth disturbance, spraying or tree-cutting activities (tree felling, skid trails etc.), should not occur in these wetlands and their buffers. If these buffers are included, implementation of the proposed project is not likely to adversely affect the northeasten bulrush.

If you are unable to adopt the buffer restrictions detailed above, we recommend that a qualified botanist with field experience in the identification of this species conduct a thorough survey of all potentially suitable wetland habitat within the proposed project area to determine the presence of the northeastern bulrush before any permits are approved or earth-moving activities begin. Surveys for this species should be conducted between June 1 and September 30, when the flowering/fruiting culm is present. A survey report should be submitted to the Service for review

[1] As defined in the Act, take means ". . . to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harm" in the definition of take means an act which kills or injures wildlife. Such act may include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering (50 CFR part 17.3). "Harass" means an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering.

and comment. A list of botanists skilled in the location and identification of the northeastern bulrush is enclosed.

Bog turtle

The project is within the known range of the bog turtle (*Clemmys muhlenbergii*), a species that is federally listed as threatened. Particularly for this project, the species may be found in Bucks, Northampton, and Carbon Counties. Bog turtles inhabit shallow, spring-fed fens, sphagnum bogs, swamps, marshy meadows, and pastures characterized by soft, muddy bottoms; clear, cool, slow-flowing water, often forming a network of rivulets; high humidity; and an open canopy. Bog turtles usually occur in small, discrete populations occupying suitable wetland habitat dispersed along a watershed. The occupied "intermediate successional stage" wetland habitat is usually a mosaic of micro-habitats ranging from dry pockets, to areas that are saturated with water, to areas that are periodically flooded. Some wetlands occupied by bog turtles are located in agricultural areas and are subject to grazing by livestock.

To determine the potential effects of the proposed project on bog turtles and their habitat, begin by identifying all wetlands in, and within 300 feet of, the project area. The project area includes all areas that will be permanently or temporarily affected by any and all project features, including building, roads, staging areas, utility lines, outfall and intake structures, wells, stormwater retention or detention basins, parking lots, driveways, lawns, etc. The area of investigation should be expanded when project effects might extend more than 300 feet from the project footprint. For example, the hydrological effects of some projects (*e.g.*, large residential or commercial developments; golf courses; community water supply wells) might extend well beyond the project footprint due to the effects that impervious surfaces or groundwater pumping may have on the hydrology of nearby groundwater-dependent wetlands. Wetlands should be included on a map showing existing and proposed project features.

If someone qualified to identify and delineate wetlands has, through a field investigation, determined that no wetlands are located in or within 300 feet of the project area (or within the expanded investigation area, as described above), it is not likely that your project will adversely affect the bog turtle. If this is the case, no further consultation with the Fish and Wildlife Service is necessary, although we would appreciate receiving a courtesy copy of the wetland investigator's findings for our files.

If wetlands have been identified in, or within 300 feet of, the project area (or in an expanded investigation area, as described above), assess their potential suitability as bog turtle habitat, as described under "*Bog Turtle Habitat Survey*" (Phase 1 survey) of the *Guidelines for Bog Turtle Surveys* (revised April 2006). Survey results should be submitted to the Service for review and concurrence. The survey guidelines, as well as a Phase 1 field form and report template, are available from the Service upon request.

Due to the skill required to correctly identify potential bog turtle habitat, we recommend that the Phase 1 survey be done by a qualified surveyor (see enclosed list). If the Phase 1 survey is done by someone who is not on this list, it is likely that a site visit by a Fish and Wildlife Service biologist will be necessary to verify their findings. *Due to the limited availability of staff from*

this office, such a visit may not be possible for some time. Use of a qualified surveyor will expedite our review of the survey results.

If potential bog turtle habitat is found in or near the project area, efforts should be made to avoid any direct or indirect impacts to those wetlands (see enclosed *Bog Turtle Conservation Zones*). Avoidance of direct and indirect effects means no disturbance to or encroachment into the wetlands (*e.g.*, filling, ditching or draining) for any project-associated features or activities. Adverse effects may also be anticipated to occur when lot lines include portions of the wetland; when an adequate upland buffer is not retained around the wetland (see *Bog Turtle Conservation Zones*); or when roads, stormwater/sedimentation basins, impervious surfaces, or wells affect the hydrology of the wetland.

If potential habitat is found, submit (along with your Phase 1 survey results) a detailed project description and detailed project plans documenting how direct and indirect impacts to the wetlands will be avoided. If adverse effects to these wetlands cannot be avoided, a more detailed and thorough survey should be done, as described under "*Bog Turtle Survey*" (Phase 2 survey) of the *Guidelines*. The Phase 2 survey should be conducted by a qualified biologist with bog turtle field survey experience (see enclosed list of qualified surveyors). Submit survey results to the Service for review and concurrence.

Based on the shapefiles that were provided with your August 12, 2014 letter, we would like to inform you that the proposed pipeline is crossing a known bog turtle site less than a mile from the boarder of Northampton County into Bucks County. We look forward to working with you in order to avoid impacts to this area as well as other potential and occupied bog turtle areas in these counties.

Assessment of Risks to Migratory Birds

The Service is the principal Federal agency charged with protecting and enhancing populations and habitat of migratory bird species. The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Department of the Interior. While the MBTA has no provision for authorizing incidental take, the Service recognizes that some birds may be killed even if all reasonable measures to avoid take are implemented.

The potential exists for avian mortality from habitat destruction and alteration associated with vegetation clearing and fragmentation within the project boundaries. Resources are available to assist you in determining which species are likely to be present within your project area (see attached enclosure) to determine appropriate conservation measures to reduce impacts to migratory birds. Site-specific factors that should be considered in project siting to avoid and minimize the risk to birds include avian abundance; the quality, quantity and type of habitat; geographic location; type and extent of bird use (*e.g.* breeding, foraging, migrating, etc.); and landscape features. Please review the enclosed information for general recommendations for avoiding and minimizing impacts to migratory birds within and around the project area. Be aware that since these are general guidelines, some of them may not be applicable or may have already been included in the project design.

Your project is located in the vicinity of the Important Bird Area (IBA) known as Hawk Mountain and Kittatinny Ridge. IBAs are designated by the Pennsylvania Ornithological Technical Committee. They are the most critical regions in the Commonwealth for conserving bird diversity and abundance, and are the primary focus of Audubon Pennsylvania's conservation efforts. To find out more information about this IBA, including which bird species breed there, visit: http://netapp.audubon.org/IBA/State/US-PA

In addition to protection under the MBTA, bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (Eagle Act). The Eagle Act protects eagles by prohibiting killing, selling, disturbing, or otherwise harming eagles, their nests or eggs. "Disturb" means to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle; 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior; or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.

Consequently, we recommend that you evaluate the project type, size, location and layout in light of the *National Bald Eagle Management Guidelines* to determine whether or not bald eagles might be disturbed as a direct or indirect result of this project. If it appears that disturbance may occur, we recommend that you consider modifying your project consistent with the *Guidelines*. These guidelines, as well as additional eagle information, are available at http://www.fws.gov/northeast/EcologicalServices/eagle.html To assist you in making a decision regarding impacts to bald eagles, a screening form can be found at http://www.fws.gov/northeast/pafo/bald_eagle.html

Summary

In cases where adverse effects to federally listed species cannot be avoided, further consultation with the Service would be necessary to avoid potential violations of section 9 (prohibiting "take" of listed species) and/or section 7 (requiring federal agencies to consult) of the Endangered Species Act. Information about the section 7 and section 10 consultation processes (for federal and non-federal actions, respectively) can be obtained by contacting this office or accessing the Service's Endangered Species Home Page (http://endangered.fws.gov).

This response relates only to endangered and threatened species under our jurisdiction, based on an office review of the proposed project's location. No field inspection of the project area has been conducted by this office. Consequently, this letter is not to be construed as addressing potential Service concerns under the Fish and Wildlife Coordination Act or other authorities. A compilation of certain federal status species in Pennsylvania is enclosed for your information.

To avoid potential delays in reviewing your project, please use the above-referenced USFWS project tracking number in any future correspondence regarding this project.

Please contact Kayla Easler of this office at (814) 234-4090 if you have any questions or require further assistance regarding this matter.

Sincerely,

Lora L. Zimmerman
Field Office Supervisor

cc:
PAFBC – Gipe
USACOE

Enclosures

PENNSYLVANIA FISH & BOAT COMMISSION
Division of Environmental Services
Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823-9620

QUALIFIED SURVEYORS FOR BOG TURTLE

58 Pa. Code §75.5 provides that in order to conduct surveys for endangered or threatened fish (fish, amphibians, reptiles and aquatic invertebrates) species or their habitat in connection with an application for a proposed or planned development activity, a surveyor must be deemed qualified by the Pennsylvania Fish and Boat Commission (PFBC). An individual who wishes to be qualified by the PFBC to conduct surveys for endangered or threatened species must demonstrate to the PFBC's satisfaction that he or she meets the qualified surveyor requirements as approved by the Executive Director and published in the *Pennsylvania Bulletin*. The following list includes persons deemed qualified by the PFBC to possess skills and to have experience in properly searching for and finding Bog Turtles (*Glyptemys muhlenbergii*) and in identifying their critical habitat. Persons not on this list but who have documented experience in conducting scientific studies of, or successful searches for, Bog Turtles and their critical habitat may submit their qualifications to the Natural Diversity Section for review and possible inclusion as a qualified surveyor. When applicable, a qualified surveyor must meet the requirements pertaining to scientific collector's permits and special permits for endangered and threatened species. All permitted collector's encounters with Bog Turtles must be reported in writing to the PFBC's Natural Diversity Section.

Teresa Amitrone Liberty Environmental, Inc. 50 N. 5th Street, 5th Floor Reading, PA 19601 (610)288-1536 tamitrone@libertyenviro.com	Ben Berra Skelly and Loy, Inc. 449 Eisenhower Blvd. Suite 300 Harrisburg, PA 17111 (717)232-0593 bberra@skellyloy.com	Tessa Bickhart Herpetological Associates, Inc. 21 Daisy Lane Bernville, PA 19506 (484)650-1508 tessabtspecialist@gmail.com
Stanley Boder Wildlife Specialists, LLC 942 Camp Trail Road Quakertown, PA 18951 (570)952-1169 stan@wildlife-specialists.com	Andy Brookens Skelly and Loy, Inc. 449 Eisenhower Blvd. Suite 300 Harrisburg, PA 17111 (717)232-0593 abrookens@skellyloy.com	Robert Bull The Wilson T. Ballard Company 4287 Fissel's Church Road Glen Rock, PA 17327 (717)424-9817 rbull@wtbco.com
Scott Bush Conestoga-Rovers & Associates 410 Eagleview Blvd. Suite 110 Exton, PA 19341 (610)321-1800 sbush@craworld.com	Bryon Dubois Dubois Environmental Consultants, LLC 1058 Prospect Avenue Manahawkin, NJ 08050 (609)488-2857 bdubois@denviro.com	B. Scott Fiegel Ecological Associates, LLC PO Box 181 Oley, PA 19547 (610)987-6585 Office (484)280-4312 Cell bscottfiegel@aol.com
Jeremy Hite RETTEW 3020 Columbia Avenue Lancaster, PA 17603 (717)715-3811 jhite@rettew.com	Kevin Keat ECSI 1095 Mill Road Pen Argyl, PA 18072 (484)515-6806 kevinkeat@ptd.net	Andrew Longenecker Ceso, Inc. 140 Lamplighter Drive Morgantown, WV 26508 (412)334-8619 longenecker@cesoinc.com

Matthew Malhame PO Box 394 Henryville, PA 18332 (570)872-1284 mmalhame@hotmail.com	Dave Moskowitz EcolSciences, Inc. 75 Fleetwood Drive Suite 250 Rockaway, NJ 07866 (973)366-9500 (732)236-2992 cell dmoskowitz@ecolsciences.com	Laura Newgard EcolSciences, Inc. 75 Fleetwood Drive Suite 250 Rockaway, NJ 07866 (973)366-9500 lnewgard@ecolsciences.com
Joe Pignatelli EcolSciences, Inc. 75 Fleetwood Drive Suite 250 Rockaway, NJ 07866 (973)366-9500 jpignatelli@ecolsciences.com	Gian Rocco 322 Strawberry Hill Road Centre Hall, PA 16828 (814)364-1204 gxr124@psu.edu	David Smith Coastal Resources, Inc. 25 Old Solomons Island Road Annapolis, MD 21401 (410)956-9000 davids@coastal-resources.net
Harry Strano Amy S. Greene Environmental 4 Walter E. Foran Blvd. Suite 209 Flemington, NJ 08822 (908)788-9676 hstrano@amygreene.com	Charles Strunk 1505 Sleepy Hollow Road Quakertown, PA 18951 (215)679-9147 strunk1@aol.com	Jason Tesauro J. Tesauro Ecological Consulting PO Box 908 Millbrook, NY 12545 (201)841-6879 jasontesauro@yahoo.com
Autumn Thomas AECOM Environmental, Inc. 4 Neshaminv Interplex STE 300 Trevose, PA 19053 (215)244-7121 autumn.thomas@aecom.com	Bridger Thompson URS Corporation 4507 N. Front Street Harrisburg, PA 17110 (717)635-7913 bridger.thompson@urs.com	Michael Torocco Herpetological Associates, Inc. 581 Airport Road Bethel, PA 19507 (717)933-8380 MTorocco@herpetologicalassociates.com
Robert Zappalorti Herpetological Associates, Inc. 575 Toms River Road Route 571 Jackson, NJ 08527 (732)833-8600 (609)618-0314 cell rzappalort@aol.com	James Drasher Aqua-Terra Environmental Ltd. PO Box 4099 Reading, PA 19606 (610)374-7500 (610)780-2150 cell jdrasher@aqua-terraenv.com	Scott Angus* 1981 lake Minsi Drive Bangor, PA 18013 (610)844-1866 Scottangus1@gmail.com
Anthony Silva* 1856 Route 9 Toms River, NJ 08755 (732)818-8699 asilva@tridentenviro.com	David Brotherton* PO Box 551 New Cumberland, PA 17070 (717)525-8162 dbrotherton@amygreene.com	Amy Nazdrowicz* Landmark Science & Engineering, Inc. 100 W. Commons Blvd ; Suite 301 New Castle, DE 19720 (302)323-9377 Ext. 136 amyn@landmark-se.com

*Conditionally approved for 2014.

BOG TURTLE CONSERVATION ZONES[1]

(revised April 18, 2001)

Projects in and adjacent to bog turtle habitat can cause habitat destruction, degradation and fragmentation. Of critical importance is evaluating the potential direct and indirect effects of activities that occur in or are proposed for upland areas adjacent to bog turtle habitat. Even if the wetland impacts from an activity are avoided (i.e., the activity does not result in encroachment into the wetland), activities in adjacent upland areas can seriously compromise wetland habitat quality, fragment travel corridors, and alter wetland hydrology, thereby adversely affecting bog turtles.

The following bog turtle conservation zones have been designated with the intent of protecting and recovering known bog turtle populations within the northern range of this species. The conservation suggestions for each zone are meant to guide the evaluation of activities that may affect high-potential bog turtle habitat, potential travel corridors, and adjacent upland habitat that may serve to buffer bog turtles from indirect effects. *Nevertheless, it is important to recognize that consultations and project reviews will continue to be conducted on a case-by-case basis, taking into account site- and project-specific characteristics.*

Zone 1

This zone includes the wetland and visible spring seeps occupied by bog turtles. Bog turtles rely upon different portions of the wetland at different times of year to fulfill various needs; therefore, this zone includes the entire wetland (the delineation of which will be scientifically based), not just those portions that have been identified as, or appear to be, optimal for nesting, basking or hibernating. In this zone, bog turtles and their habitat are most vulnerable to disturbance, therefore, the greatest degree of protection is necessary.

Within this zone, the following activities are likely to result in habitat destruction or degradation and should be avoided. These activities (not in priority order) include:

- development (e.g., roads, sewer lines, utility lines, storm water or sedimentation basins, residences, driveways, parking lots, and other structures)
- wetland draining, ditching, tiling, filling, excavation, stream diversion and construction of impoundments
- heavy grazing
- herbicide, pesticide or fertilizer application[2]
- mowing or cutting of vegetation[2]
- mining
- delineation of lot lines (e.g., for development, even if the proposed building or structure will not be in the wetland)

Some activities within this zone may be compatible with bog turtle conservation but warrant careful evaluation on a case-by-case basis:

- light to moderate grazing
- non-motorized recreational use (e.g., hiking, hunting, fishing)

Zone 2

The boundary of this zone extends *at least 300 feet* from the edge of Zone 1 and includes upland areas adjacent to Zone 1. Activities in this zone could indirectly destroy or degrade wetland habitat over the short or long-term, thereby adversely affecting bog turtles. In addition, activities in this zone have the potential to cut off travel corridors between wetlands occupied or likely to be occupied by bog turtles, thereby isolating or dividing populations and increasing the risk of turtles being killed while attempting to disperse. Some of the indirect effects to wetlands resulting from activities in the adjacent uplands include: changes in hydrology (e.g., from roads, detention basins, irrigation, increases in impervious surfaces, sand and gravel mining); degradation of water quality (e.g., due to herbicides, pesticides, oil and salt from various sources including roads, agricultural fields, parking lots and residential developments); acceleration of succession (e.g., from fertilizer runoff); and introduction of exotic plants (e.g., due to soil disturbance and roads). This zone acts as a filter and buffer, preventing or minimizing the effects of land-use activities on bog turtles and their habitat. This zone is also likely to include at least a portion of the groundwater recharge/supply area for the wetland.

Activities that should be avoided in this zone due to their potential for adverse effects to bog turtles and their habitat include:

- development (e.g., roads, sewer lines, utility lines, storm water or sedimentation basins, residences, driveways, parking lots, and other structures)
- mining
- herbicide application[2]
- pesticide or fertilizer application
- farming (with the exception of light to moderate grazing - see below)
- certain types of stream-bank stabilization techniques (e.g., rip-rapping)
- delineation of lot lines (e.g., for development, even if the proposed building or structure will not be in the wetland)

Careful evaluation of proposed activities on a case-by-case basis will reveal the manner in which, and degree to which activities in this zone would affect bog turtles and their habitat. Assuming impacts within Zone 1 have been avoided, evaluation of proposed activities within Zone 2 will often require an assessment of anticipated impacts on wetland hydrology, water quality, and habitat continuity.

Activities that are likely to be compatible with bog turtle conservation, but that should be evaluated on a case-by-case basis within this zone include:

- light to moderate grazing
- non-motorized recreational use (e.g., hiking, hunting, fishing)
- mowing or cutting of vegetation

Zone 3

This zone includes upland, wetland, and riparian areas extending either to the geomorphic edge of the drainage basin or at least one-half mile beyond the boundary of Zone 2. Despite the distance from Zone 1, activities in these areas have the potential to adversely affect bog turtles and their habitat. This particularly applies to activities affecting wetlands or streams connected to or contiguous with Zone 1, because these areas may support undocumented occurrences of bog turtles and/or provide travel corridors. In addition, some activities (e.g., roads, groundwater withdrawal, water/stream diversions, mining, impoundments, dams, "pump-and-treat" activities) far beyond Zone 1 have the potential to alter

the hydrology of bog turtle habitat, therefore, another purpose of Zone 3 is to protect the ground and surface water recharge zones for bog turtle wetlands. Where the integrity of Zone 2 has been compromised (e.g., through increases in impervious surfaces, heavy grazing, channelization of stormwater runoff), there is also a higher risk of activities in Zone 3 altering the water chemistry of bog turtle wetlands (e.g., via nutrient loading, sedimentation, and contaminants).

Activities occurring in this zone should be carefully assessed in consultation with the Fish and Wildlife Service and/or appropriate State wildlife agency to determine their potential for adverse effects to bog turtles and their habitat. Prior to conducting activities that may directly or indirectly affect wetlands, bog turtles and/or bog turtle habitat surveys should be conducted in accordance with accepted survey guidelines.

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[1] These guidelines are taken directly from the final "Bog Turtle (*Clemmys muhlenbergii*), Northern Population, Recovery Plan" (dated May 15, 2001).

[2] Except when conducted as part of a bog turtle habitat management plan approved by the Fish and Wildlife Service or State wildlife agency

BOG TURTLE HABITAT (PHASE 1) SURVEY REPORT

(template revised by USFWS on 4/13/2006)

The U.S. Fish and Wildlife Service (Pennsylvania Field Office) developed the following report template to ensure that a sufficient amount of detailed information is consistently submitted for agency review. Phase 1 surveyors are encouraged to use this template to format their reports, to ensure that all necessary information is provided. Revisions to this template are likely, as we continue to receive feedback on its content, structure, and ease of use. Example and explanatory language within this template is italicized. Use the current Bog Turtle Survey Guidelines (revised April 2006) in conjunction with this template.

PROJECT and SITE INFORMATION

This Phase 1 survey was conducted on behalf of:

Name: _____

☐ landowner ☐ developer ☐ state agency ☐ local government

☐ other (_____)

Address: _____

_____

City/State/Zip: _____

Telephone: _____

Project / Property Name: _____

Project / Property Location:

Address: _____

_____

City/State/Zip: _____

Township/Municipality: _____

County: _____

Watershed (minor): _____

Watershed (major): _____

The project location is shown on Figure 1 (_____ USGS 7.5-minute topographic map).

[Include USGS topographic map showing project area location. Identify county, township, and quadrangle name on map, as well as project name.]

Project Area / Property – Size and Extent

[Identify the size/extent of the project area. For example, the project area for a proposed residential development would include all areas that would be affected (directly or indirectly) by all parts of the development, including buildings, roads, driveways, lots in their entirety, utility lines, water and sewer lines, stormwater detention/retention basins, staging and access areas, recreational fields or trails, etc. Often, this includes the entire land parcel, all of which will be either directly or indirectly affected by the project. In some cases, a land parcel is being surveyed, prior to developing project plans. In that case, identify the land parcel (e.g., "the 20-acre David Jones property") as the project area, and explain that project plans have not yet been developed.]

Current Land Use and Setting

[Describe current land use and the overall setting. Also, describe what habitat type(s) are currently in the project area (e.g., "Eighty acres of the 100-acre parcel is in row crops, while the remainder is a woodlot dominated by red maple and green ash that are approximately 40 years old. A stream, approximately 6 inches deep and 2 feet wide crosses through the woodlot. A farmhouse and barn also occur on the property."]

Figure 2 represents a detailed map of the project area or property, showing existing features (including property boundaries, structures, power lines, roads, wetlands, ponds, streams, and major cover types).

[Include a project area map, showing 1) property/parcel boundaries; 2) existing features and general cover types (e.g., roads, power lines, agricultural fields, forest, streams, ponds, houses, spring houses); and 3) all wetlands (numbered consistent with this report). Include photo point references for each wetland.]

Project Description

[Describe the project. Include the project description, including the project purpose, timing, size, duration, etc. If the project is part of a larger undertaking, describe the relationship between the parts. For example, "This project involves the construction of sewer and water lines to connect a proposed 250-unit residential development (located on a 100-acre parcel of land) to the City of Mudville's existing wastewater treatment plant." If the project is more vague, at least describe what is proposed for the property, e.g., "The landowner intends to develop a residential subdivision on the property, but plans have not yet been drawn up."]

Permit Area (for wetland/stream encroachments):

[If it is known at the time of the phase 1 survey that one or more permits will be necessary for wetland and/or stream encroachments, disclose this information. For example, "Although plans have not been finalized, it appears that at least three wetland and two stream crossings will be necessary for road and utility crossings." If no wetland or stream encroachments will be necessary, indicate that as well – if you are sure none will be needed.]

WETLAND INFORMATION

[Include information about all wetlands on the property or in the project area, regardless of whether or not they are "jurisdictional" wetlands, pursuant to Section 404 of the Clean Water Act.]

A wetland investigation was conducted _____ [*identify the extent of the wetland investigation, e.g., "on the entire 220-acre parcel" or "in the 50-foot right-of-way on either side of S.R. 123]. [If some areas were not investigated, explain why. If these areas occur in a location that will be subject to future phases of development, they should be surveyed now. If the entire property/parcel was not investigated, describe exactly what area(s) were investigated, and why.]*

Wetlands were ☐ identified ☐ delineated on _____ [date(s)] by:

Name: _____

Affiliation: _____

Address: _____

_____

City/State/Zip: _____

Telephone: _____

Email: _____

Wetlands were delineated in accordance with _____ *[describe delineation method.] [If a wetland delineation has not been conducted, explain why.]*

All wetlands _____ *[e.g., "in the project area" or "on the 220-acre property" or "in the 50 foot right-of-way"]* were identified and delineated. *[If this is not the case, explain why.]* Wetland information is summarized in Table 1.

Table 1. Wetland Size and Location

Wetland ID	Wetland Size (acres)	Designated Survey Area (acres) [1]	Lat/Long[2]	Is the entire wetland on site?[3]

1 "Designated survey areas" are those areas of the wetland that meet the soils, hydrology and vegetation criteria for potential bog turtle habitat. These areas may occur within the emergent, scrub-shrub or forested parts of the wetland.

2 For smaller wetlands (*e.g.*, up to 3 acres) lat/long should be approximate center of wetland); for larger wetlands, either indicate approximate center or GPS the outer ends of the wetland. Lat/long should be submitted in degrees-minutes-seconds or degree-decimal format. Be sure to indicate the GPS datum (i.e., NAD 27, NAD 83, or WGS 84).

3 Answer "yes" if the entire wetland is located within the property/parcel boundaries or right-of-way. If any part of the wetland extends off-site, or if the entire wetland is off-site (e.g., but close to the parcel boundaries) answer "no" and provide a further explanation in the wetland narrative section.

PHASE 1 SURVEY

[During the Phase 1 Survey, examine all wetlands on the land parcel, or all wetlands that may be directly or indirectly affected by any aspect of the project. Generally, indirect effects should be assumed to extend about 300 feet beyond the project footprint (e.g., sedimentation from earth disturbance, fertilizer and pesticide transport beyond lot boundaries or agricultural fields). However, the hydrological effects of development or construction (e.g., due to roads, wells, stormwater management) may extend well beyond 300 feet from the area of direct impact. See "Bog Turtle Conservation Zones" for further guidance.]

The Phase 1 survey was conducted on _____ [date(s)] by:

Name(s): _____

Affiliation: _____

Address: _____

_____

City/State/Zip: _____

Telephone: _____

Email: _____

A Phase 1 survey of all wetlands located _____ [*identify the extent of the Phase 1 investigation, e.g., "on the entire 220-acre parcel" or "in the 50-foot right-of-way on either side of S.R. 123]* was conducted. *[If some wetlands were not surveyed, explain why. If these wetlands occur in an area(s) that will be subject to future phases of development, they should be surveyed now.]*

A summary of the Phase 1 survey results is included in Table 2. Detailed information about each wetland follows the table. Completed field forms for each wetland are included in Appendix A.

Table 2. Summary of Phase 1 Survey Results

Wetland ID	Wetland Size	Wetland Type & Amount (% or acres)	Extent of "Mucky" Soils[1] (by wetland type)	Survey Effort *(in person-hrs)*	Bog Turtle Habitat?
1	*1.5*	*PEM – 50%* *PSS -- 50%*	*PEM – 80%* *PSS – 50%*	*2*	*YES*

1 "Mucky" is used to describe soils that can be easily penetrated with a probe. For Phase 1 surveys, a 1-inch diameter blunt-ended wooden pole (e.g., broom or tool handle) is used. "Mucky" is NOT used to refer to a specific soil type or soil classification.

Wetland 1

[Include narrative description of wetland. Describe dominant vegetation, degree and distribution of "muckiness", and hydrology. Also describe any disturbance noted (e.g., ditches, fill, grazing).

[Include a map of the wetland, showing the extent of the "designated survey area(s)". Also, a sketch of the distribution of wetland types (e.g., PEM, PSS, PFO, etc.) within the wetland is helpful.]

[List any herps found (or previously found by others).]

[Include photo(s) of wetland. Be sure photos are representative of the wetland type(s) found.]

[If the wetland continues off-site, disclose this information, describe the off-site portion, and indicate the degree to which the off-site portion was inspected.]

Wetland 2

See above for information to include.

Off-site Adjacent Wetlands

[If any wetlands occur off-site (e.g., adjacent to the subject property), and they might be directly or indirectly affected by the proposed project (or any aspects thereof) they should be included in this Phase 1 report. If these wetlands were not surveyed, visual observations from the subject property or from a public road should be reported.]

NOTE: If potential habitat is found and the project proponent chooses to assume bog turtles are present and avoid potential adverse effects to the species (rather than conduct a Phase 2 survey), a detailed project narrative and detailed project plans should be submitted to the Fish and Wildlife Service and Pennsylvania Fish and Boat Commission (along with this Phase 1 Report). The narrative and plans should demonstrate that the project will have no direct or indirect adverse effects to bog turtles or their habitat. See "Bog Turtle Conservation Zones" for further guidance.

Appendix A

[Include a completed "USFWS / PFBC Bog Turtle Habitat Evaluation – Field Form" for each wetland. Also -- make sure the forms are legible.]

Appendix B

[Include information about the person who conducted the Phase 1 survey, including the name, address, telephone number, email address, and qualifications (e.g., "recognized, qualified Phase 2 bog turtle surveyor".]

U.S. FISH AND WILDLIFE SERVICE
Pennsylvania Field Office

QUALIFIED NORTHEASTERN BULRUSH SURVEYORS

The following list includes persons known by the U.S. Fish and Wildlife Service to have the skills and experience to conduct surveys for the northeastern bulrush (*Scirpus ancistrochaetus*). Observations of the northeastern bulrush at previously undocumented sites must be reported in writing to the Service within 48 hours. Northeastern bulrush surveys should be overseen by a qualified surveyor, who will be present in the field at all times during the investigation.

This information is not to be construed as an endorsement of individuals or firms by the Service or any of its employees. Persons not on this list, but who have documented experience in conducting scientific studies of, or successful searches for, the northeastern bulrush may submit their qualifications to the Service for review. The submission must include documentation that the requestor has experience successfully locating and identifying the northeastern bulrush and its habitat. Additions to and deletions from this list are at the sole discretion of the Service. This list is subject to revision at any time without prior notice.

Richard Mellon
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rmellon@mellonbiological.com

Staff Botanist
Western Pennsylvania Conservancy
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Revised 03/05/2014

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Revised 03/05/2014

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monarda55@gmail.com

Revised 03/05/2014

From: Shellenberger, Pamela <pamela_shellenberger@fws.gov>
Sent: Wednesday, October 29, 2014 2:15 PM
To: joanthan.west@urs.com; Poppel, Deborah
Cc: Kayla Easler
Subject: Penn East Pipeline; USFWS 2014-1013
Attachments: Migratory Bird_ENCLOSURE_General.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for taking the time to meet with us this morning to discuss the Penn East Pipeline project.

Attached, please find the adaptive management practices for conserving migratory birds.

Also, the following are locations of bald eagle nests that are located within 1 mile (or closer) to the LOD :

[redacted]

Please evaluate the project type, size, location and layout in light of the *National Bald Eagle Management Guidelines* to determine whether or not bald eagles might be disturbed as a direct or indirect result of this project. If it appears that disturbance may occur, we recommend that you consider modifying your project consistent with the *Guidelines*. These guidelines, as well as additional eagle information, are available at http://www.fws.gov/northeast/EcologicalServices/eagle.html

To assist you in making a decision regarding impacts to bald eagles, a screening form can be found at http://www.fws.gov/northeast/pafo/bald_eagle.html

Also, as discussed in the meeting, there are new bald eagle nests built annually, so when you are conducting surveys for other species near large water bodies, please be aware that new nests could be in the vicinity.

Thank you,

Pamela Shellenberger
U.S. Fish and Wildlife Service
814-234-4090 x241
814-234-0748 (f)

****PLEASE NOTE**** In early November, our office will be moving to a new location. During the transition, email and phone services will be intermittent, and response times will be delayed. We apologize for the inconvenience. Our phone and fax numbers will be unchanged; however, starting on November 6th the new office mailing/physical address will be:

March 30, 2015

Ms. Kayla Easler
U.S. Fish and Wildlife Service
315 South Allen Street, Suite 322
State College, PA 16801

Dear Ms. Easler:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Spectra Energy Partners; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. Over the past months, PennEast has worked to refine a preferred alternative route and to obtain permissions to survey. To that end, we must inform you that the preferred alternative route has again been adjusted to account for engineering, environmental, and land use constraints that have been identified since we last provided your agency with detailed project mapping on January 14, 2015.

Following feedback from FERC's scoping meetings and numerous conversations with landowners, state and local agencies, and other various stakeholders, PennEast has revised and refined various portions of the preferred alternative route. The largest variations to the previously released route are related to the location of the crossing of the Bethlehem Authority water supply mainline (MP 44 and MP 45), Appalachian Trail crossing (between MP 46 and MP 55), and accommodating future subdivision and housing development plans. Additional field data gained over the last month has helped make smaller adjustments related to environmental surveys and individual discussions with landowners.

In addition to the route variations noted above, an additional interconnect was needed for the Gilbert Power Generation facility in Holland Township, New Jersey, which is fed by a small lateral (12 inches) to supply natural gas to the facility. The previously located interconnection with Elizabethtown Gas was relocated so that both interconnects can be co-located within the power station's industrial property to minimize additional above-ground impacts.

A summary of the significant route variations in Pennsylvania is provided below:

- In Towamensing Township in Carbon County, PA, less than one mile of the alignment has been re-routed ¼-mile to the east as a result of consultations with the Bethlehem Authority (Authority). The alignment has been re-routed between mileposts 44 and 45 to cross the Authority's water supply mainline in a location where it is deeper in an effort to maximize protection of the Authority's resources.

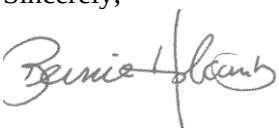
- Straddling the Carbon – Northampton County line in PA, approximately 8 miles of the alignment between mileposts 46 and 55 has been re-routed up to 1 mile to the west of the previous route in an effort to refine the crossing location of the Appalachian Trail.

- In Northampton County, PA, approximately 2.5 miles of the alignment has been re-routed less than ½-mile to the north of the previous route as a result of consultations with private landowners and local officials. The alignment has been re-routed between mileposts 59 and 62 to accommodate current and future land use plans in the area.

Updated GIS shapefiles for the entire new preferred alternative route are being provided to aide in your review and analysis of the project.

We look forward to continuing to work with you and your colleagues on this important project. Please contact me if you have any questions.

Sincerely,



Bernie Holcomb
Pipeline Environmental Services Manager

URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com

October 7, 2015

Ms. Pamela Shellenberger
U.S. Fish and Wildlife Service
315 South Allen Street, Suite 322
State College, PA 16801

RE: PennEast Pipeline Project
Privileged and Confidential
USFWS Project Number: 2014-1013
Survey Results: Indiana bat, northern long-eared bat, bog turtle, and northeastern bulrush
Project Screening Form: bald eagle

Dear Ms. Shellenberger:

On behalf of PennEast Pipeline Company, LLC (PennEast), we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project (Project). PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

In accordance with coordination with your office, PennEast contracted with Wildlife Specialists, LLC (Wildlife Specialists) to conduct habitat and presence/absence surveys for Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*); with Mellon Biological Services to conduct surveys for Northeastern bulrush (*Scirpus ancistrochaetus*); and with several Recognized, Qualified Bog Turtle Surveyors (RQBTS) to conduct Phase I and Phase II surveys for bog turtle (*Glyptemys muhlenbergii*). These surveys were conducted in accordance with federal survey guidelines established for each species, by qualified biologists, and in areas of the Project identified in consultation with the US Fish and Wildlife Service (USFWS) Pennsylvania Field Office.

Reports documenting the results of these surveys are enclosed for your review. In addition, a completed USFWS Bald Eagle Project Screening Form is also enclosed for your records. Based on the results of the surveys, PennEast requests USFWS concurrence on the following:

- PennEast will adhere to the recommended Avoidance Measures (3, 4, and 5); therefore no adverse impacts to bald eagle from the Project are anticipated.

- No northeastern bulrush were found during surveys by a qualified botanist in suitable habitats, therefore, no adverse impacts to northeastern bulrush from the Project are anticipated.

- In wetlands identified as potential bog turtle habitat during Phase I surveys, no bog turtles were found following Phase 2 surveys conducted according to USFWS protocol. Therefore, no adverse impacts to bog turtle from the Project are anticipated in these areas. Additional surveys will be conducted in spring of 2016 in areas where access permission was denied; these results will be provided in a supplemental report.

- No Indiana bats were identified following surveys by qualified biologists according to protocol. Therefore, no adverse impacts to Indiana bat from the Project are anticipated.

URS Corporation 625 West Ridge Pike, Suite E-100 ; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956 ; Fax: 610-832-3501 bernard.holcomb@urs.com

- Northern long-eared bats were identified following surveys by qualified biologists. Based upon telemetry results and roost locations, the following sections of the Project should adhere to the tree-clearing timing restriction (i.e., only clear trees between November 1 and March 31):

Based on the results of the surveys and telemetry, which identified active roost and foraging locations, it is expected that timing restrictions for tree clearing will be required within 0.25 mile of the following areas identified by milepost (MP):

- MP [redacted]
- MP [redacted]
- MP [redacted]
- MP [redacted]
- MP [redacted]
- MP [redacted]
- MP [redacted]
- MP [redacted]
- MP [redacted]
- MP [redacted]
- MP [redacted]
- MP [redacted]

In addition, USFWS provided information on 3 known hibernacula within 0.25 mile of the Project corridor. These are known as Durham Cave 1, Durham Cave 2, and Tunnel 34. Cave 1 and Cave 2 are both located in the vicinity of MP [redacted], 1,125 feet south of the proposed pipeline. Tunnel 34 is located in the vicinity of MP [redacted], 1,200 feet southwest of an access road and 6,100 feet west of the proposed pipeline. At USFWS' request, the Pennsylvania Game Commission (PGC) was contacted to find out information about any connector tunnels between Cave 1 and Cave 2. Greg Turner of PGC indicated that the only connection known to exist between the two caves is airflow, and that when they were last surveyed in 2001, 34 bats were counted, 11 of which were northern long-eared bats. The USFWS concluded that a 0.25-mile buffer will provide basic protection to hibernacula and hibernating colonies (USFWS 2015). Direct impacts such as filling, excavation, blasting, noise, and smoke exposure will be restricted to extent practicable within these buffer areas. With these mitigation measures in place, the Project should not adversely impact the northern long-eared bat.

We look forward to continued consultation with your office on this important Project. Please contact Deb Poppel or me if you have any questions.

Sincerely,

Bernie Holcomb
Pipeline Environmental Services Manager

cc: Jeremy Markuson, USFWS-NJ
John Taucher, PGC
Dave Mong, DCNR

URS Corporation 625 West Ridge Pike, Suite E-100 ; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956 ; Fax: 610-832-3501 bernard.holcomb@urs.com

Poppel, Deborah

From: Poppel, Deborah
Sent: Thursday, December 17, 2015 11:15 AM
To: 'Shellenberger, Pamela'
Subject: PennEast update notice
Attachments: PennEast_ProposedRoute_20151214.kmz; PENNEAST_SHAPEFILES_ToDistribute.zip

On behalf of PennEast Pipeline Company (PennEast), thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company; PSEG Power; SJI Midstream; Spectra Energy Partners; and UGI Energy Services.

As an interstate natural gas pipeline, PennEast Pipeline will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. PennEast filed Certificates of Public Convenience and Necessity and Related Authorizations with FERC on September 24, 2015. Since the September 24 filing, PennEast has evaluated several additional route alternatives based on discussions with landowners, regulatory agencies and other stakeholders, as well as comments filed in this proceeding. In light of those evaluations, PennEast has adopted five minor deviations from the route proposed in the September 24 Filing:

Deviation No. 1005 is located between mileposts ("MP") 9.07 and 12.10 in Luzerne County, Pennsylvania. PennEast adopted this deviation to address landowner concerns and to improve constructability of the proposed Project route. The landowner and quarry operators affected by this portion of the proposed Project route indicated that the proposed route in the September 24 Filing has the potential to adversely affect quarry operations. Additionally, this portion of the route in the September 24 Filing route presented a challenging crossing of Mill Creek. Deviation No. 1005 addresses both of these concerns. In addition, this deviation reduces the overall length of the Project and increases the route's co-location with existing utility easements.

Deviation No. 1400 is located between MP 43.95 and 44.55 in Carbon County, Pennsylvania. This deviation has been adopted based on feedback that PennEast received in collaboration with the Bethlehem Authority, which operates a water supply system in Carbon and Northampton Counties, Pennsylvania. Deviation No. 1400 provides a means of crossing the Bethlehem Authority waterline by a trenchless method and avoids the need to locate temporary workspace near the waterline. This deviation also includes a single HDD crossing of Beltzville Lake, instead of the two crossings that were proposed in the September 24 Filing, which minimizes impacts to the Beltzville State Park.

Deviation No. 1701 is located between MP 79.10 and 81.60 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route and is based on feedback that PennEast received in collaboration with the New Jersey Department of Environmental Protection. Deviation No. 1701 minimizes impacts to the New Jersey Natural Lands Trust's Gravel Hill Preserve by increasing co-location with existing utility easements and impacting fewer parcels within the Gravel Hill Preserve. In addition, this deviation allows the proposed route to be in closer proximity to the proposed NRG REMA, LLC/Elizabethtown Gas delivery meter station, and it also relocates a proposed mainline valve from a residential area to an industrial area.

Deviation No. 1802 is located between MP 84.68 and 86.54 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route to avoid crossing a federally preserved farm. PennEast considered different alternatives to avoid this crossing, and the adopted Deviation No. 1802 minimizes land use impacts and overall land requirements to avoid this crossing.

Deviation No. 1900 is located between MP 91.91 and 93.55 in Hunterdon County, New Jersey. This deviation has been adopted to incorporate a route optimization that avoids crossing the Lockatong Creek three times with an open cut. This deviation now allows the Project route to cross the Lockatong Creek using a trenchless method. Deviation No. 1900 also avoids impacts to both a federally preserved farm and a New Jersey Green Acres Program protected parcel.

An updated Google Earth kmz file and GIS shapefiles for the proposed route are attached to aide in your review and analysis of the Project. (To open the shapefiles, please add a ".zip" extension to the file and then extract the files.) Please let us know if you have any difficulty opening the attached files.

Deborah Poppel, CWB
Senior Ecologist/Project Manager
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National Marine Fisheries Service

August 12, 2014

Ms. Mary Colligan
Assistant Regional Administrator

NATIONAL MARINE FISHERIES SERVICE
Protected Resources Division
55 Great Republic Drive
Gloucester, MA 01931-2298

Re: Project Review
PennEast Pipeline Company, LLC - PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania
Hunterdon and Mercer Counties, New Jersey

Dear Ms. Colligan:

The PennEast Pipeline Company, LLC (PennEast), is a partnership with UGI Energy Services (UGIES), AGL Resources, NJR Pipeline Company, and South Jersey Industries. The PennEast Pipeline Project (Project) proposes to construct a new 100-mile, 30-inch pipeline to deliver natural gas from northeast Pennsylvania to other markets in Pennsylvania and New Jersey. This new supply of natural gas will bring lower cost supplies to residents and businesses in Pennsylvania and New Jersey, while enhancing pipeline system flexibility and reliability for the local gas utilities.

PennEast intends to file its certificate application for the PennEast Pipeline Project with the Federal Energy Regulatory Commission (FERC) in mid-2015, and anticipates receiving authorization and starting construction in 2017. Permit applications with other federal, state, and local agencies will be submitted within similar timeframes as the certificate application. The permit proceedings conducted by these agencies will provide additional opportunities for public input and involvement. FERC's determination of public convenience and necessity includes a thorough, comprehensive environmental review of proposed projects, working closely with federal, state, and local agencies and in accordance with the National Environmental Policy Act (NEPA).

On behalf of PennEast, URS Corporation (URS) is requesting a Project Review for rare, candidate, threatened, and endangered species under the jurisdiction of the National Marine Fisheries Service (NMFS) for the PennEast Pipeline Project. A critical issues analysis was conducted for multiple routes using readily available secondary source data to select the **Least**

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
Fax: 610.832.3501

Environmentally Damaging Practicable Alternative (LEDPA) route. Mapping depicting the environmental features evaluated for the preferred alternative is enclosed. We are asking for your review prior to the initiation of wetland and watercourse field surveys to be conducted this fall. We hope to concurrently identify any habitat for species under your agencies' jurisdiction at this time. The environmental study area will be a 400-foot corridor centered on the approximately 100-mile alignment. The anticipated permanent right-of-way (ROW) and temporary construction work area will be approximately 100-feet. The study area is wider than the disturbance area to allow for minor alignment shifts to avoid any sensitive resources that may be identified during the environmental field investigations.

The following are enclosed to facilitate your review:

- PennEast Project Fact Sheet; and
- CD containing:
    - shapefiles of the alignment;
    - USGS 7.5 minute quadrangle maps with project alignment; and
    - detailed maps depicting the project areas and known secondary source resources

If you have any questions or require additional information regarding this request, please contact me at 610.832.1810 or bernard.holcomb@urs.com.

Sincerely,

Bernard Holcomb
Pipeline Environmental Services Manager
Enclosures (2)

cc: Mr. Anthony Cox (UGI)
Mr. Dante D'Alessandro (UGI)

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Northeast Fisheries Science Center
James J. Howard Marine Sciences Laboratory
74 Magruder Road
Highlands, New Jersey 07732

September 18, 2014

TO: Bernard Holcomb
Pipeline Environmental Services Manager
URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428

Karen Greene
(Reviewing Biologist)

SUBJECT: PennEast Pipeline Company, LLC.
PennEast Pipeline Project
Luzerne, Carbon, Northampton and Bucks Counties, PA
Hunterdon and Mercer Counties, New Jersey

We have reviewed the information provided to us regarding the above subject project. We offer the following preliminary comments pursuant to the Fish and Wildlife Coordination Act and the Magnuson-Stevens Fishery Conservation and Management Act:

Endangered Species Act

No threatened or endangered species under the jurisdiction of the NMFS are known to occur in the project area. As a result, further consultation by the federal action agency will not be necessary as part of the federal permit process. However, if project plans change that would alter the basis for this determination, or if new species or critical habitat is designated, consultation should be reinitiated.

Fish and Wildlife Coordination Act

The Delaware River and its tributaries are a migratory pathways and a spawning, nursery and forage habitat for anadromous fishes including striped bass, alewife, blueback herring and American shad. Because landing statistics and the number of fish observed on annual spawning runs indicate a drastic decline in alewife and blueback herring populations throughout much of their range since the mid-1960's they have designated as a Species of Concern by NOAA. Any in-water work in these waterways should be avoided from March 1 to June 30 of each year to minimize adverse effects on migrating and spawning anadromous fishes. Wetland impacts should be avoided and minimized to the maximum extent practicable and compensatory mitigation should be provided for unavoidable wetland impacts. Any wetlands impacted temporarily should be restored. If project plans change that would alter the basis for this determination, consultation should be reinitiated.

Magnuson-Stevens Fishery Conservation and Management Act
Essential Fish Habitat

No essential fish habitat (EFH) has been designated in the project area. As a result, further EFH consultation by the federal action agency will not be necessary as part of the federal permit process. If project plans change that would alter the basis for this determination, or if new species or EFH is designated, consultation should be reinitiated. For a listing of EFH and further information, please go to our website at: www.greateratlantic.fisheries.noaa.gov/habitat. If you wish to discuss this further, please call me at (7320 872-3023 or e-mail karen.greene@noaa.gov.

March 30, 2015

Ms. Karen Greene
National Marine Fisheries Service
74 Magruder Road
Highlands, NJ 07732

Dear Ms. Greene:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Spectra Energy Partners; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. Over the past months, PennEast has worked to refine a preferred alternative route and to obtain permissions to survey. To that end, we must inform you that the preferred alternative route has again been adjusted to account for engineering, environmental, and land use constraints that have been identified since we last provided your agency with detailed project mapping on January 14, 2015.

Following feedback from FERC's scoping meetings and numerous conversations with landowners, state and local agencies, and other various stakeholders, PennEast has revised and refined various portions of the preferred alternative route. The largest variations to the previously released route are related to the location of the crossing of the Bethlehem Authority water supply mainline (MP 44 and MP 45), Appalachian Trail crossing (between MP 46 and MP 55), and accommodating future subdivision and housing development plans. Additional field data gained over the last month has helped make smaller adjustments related to environmental surveys and individual discussions with landowners.

In addition to the route variations noted above, an additional interconnect was needed for the Gilbert Power Generation facility in Holland Township, New Jersey, which is fed by a small lateral (12 inches) to supply natural gas to the facility. The previously located interconnection with Elizabethtown Gas was relocated so that both interconnects can be co-located within the power station's industrial property to minimize additional above-ground impacts.

A summary of the significant route variations is provided below:

- In Towamensing Township in Carbon County, PA, less than one mile of the alignment has been re-routed ¼-mile to the east as a result of consultations with the Bethlehem Authority (Authority). The alignment has been re-routed between mileposts 44 and 45 to cross the Authority's water supply mainline in a location where it is deeper in an effort to maximize protection of the Authority's resources.

- Straddling the Carbon – Northampton County line in PA, approximately 8 miles of the alignment between mileposts 46 and 55 has been re-routed up to 1 mile to the west of the previous route in an effort to refine the crossing location of the Appalachian Trail.

- In Northampton County, PA, approximately 2.5 miles of the alignment has been re-routed less than ½-mile to the north of the previous route as a result of consultations with private landowners and local officials. The alignment has been re-routed between mileposts 59 and 62 to accommodate current and future land use plans in the area.

- In Holland Township, Hunterdon County, NJ, a new 12-inch lateral is needed to run from milepost 76.6 on the mainline pipeline route approximately ½-mile south to an interconnect with Elizabethtown Gas and the Gilbert Power Generation facility. The previously located interconnection with Elizabethtown Gas was relocated so that both interconnects can be co-located within the power station's industrial property to minimize additional above-ground impacts.

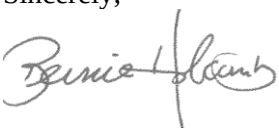
- In Holland Township, Hunterdon County, NJ, approximately two miles of the alignment has been re-routed less than ½-mile to the south of the previous route to accommodate a future private development planned for the area.

- In West Amwell Township, Hunterdon County, NJ, approximately 1 mile of the alignment has been re-routed up to 1,000 feet east of the previous route to avoid a newly constructed home that was identified by a landowner.

Updated GIS shapefiles for the entire new preferred alternative route are being provided to aide in your review and analysis of the project.

We look forward to continuing to work with you and your colleagues on this important project. Please contact me if you have any questions.

Sincerely,



Bernie Holcomb
Pipeline Environmental Services Manager

URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com

Poppel, Deborah

From: Poppel, Deborah
Sent: Thursday, December 17, 2015 11:15 AM
To: 'karen.greene@noaa.gov'
Subject: PennEast update notice
Attachments: PennEast_ProposedRoute_20151214.kmz; PENNEAST_SHAPEFILES_ToDistribute.zip

On behalf of PennEast Pipeline Company (PennEast), thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company; PSEG Power; SJI Midstream; Spectra Energy Partners; and UGI Energy Services.

As an interstate natural gas pipeline, PennEast Pipeline will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. PennEast filed Certificates of Public Convenience and Necessity and Related Authorizations with FERC on September 24, 2015. Since the September 24 filing, PennEast has evaluated several additional route alternatives based on discussions with landowners, regulatory agencies and other stakeholders, as well as comments filed in this proceeding. In light of those evaluations, PennEast has adopted five minor deviations from the route proposed in the September 24 Filing:

Deviation No. 1005 is located between mileposts ("MP") 9.07 and 12.10 in Luzerne County, Pennsylvania. PennEast adopted this deviation to address landowner concerns and to improve constructability of the proposed Project route. The landowner and quarry operators affected by this portion of the proposed Project route indicated that the proposed route in the September 24 Filing has the potential to adversely affect quarry operations. Additionally, this portion of the route in the September 24 Filing route presented a challenging crossing of Mill Creek. Deviation No. 1005 addresses both of these concerns. In addition, this deviation reduces the overall length of the Project and increases the route's co-location with existing utility easements.

Deviation No. 1400 is located between MP 43.95 and 44.55 in Carbon County, Pennsylvania. This deviation has been adopted based on feedback that PennEast received in collaboration with the Bethlehem Authority, which operates a water supply system in Carbon and Northampton Counties, Pennsylvania. Deviation No. 1400 provides a means of crossing the Bethlehem Authority waterline by a trenchless method and avoids the need to locate temporary workspace near the waterline. This deviation also includes a single HDD crossing of Beltzville Lake, instead of the two crossings that were proposed in the September 24 Filing, which minimizes impacts to the Beltzville State Park.

Deviation No. 1701 is located between MP 79.10 and 81.60 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route and is based on feedback that PennEast received in collaboration with the New Jersey Department of Environmental Protection. Deviation No. 1701 minimizes impacts to the New Jersey Natural Lands Trust's Gravel Hill Preserve by increasing co-location with existing utility easements and impacting fewer parcels within the Gravel Hill Preserve. In addition, this deviation allows the proposed route to be in closer proximity to the proposed NRG REMA, LLC/Elizabethtown Gas delivery meter station, and it also relocates a proposed mainline valve from a residential area to an industrial area.

Deviation No. 1802 is located between MP 84.68 and 86.54 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route to avoid crossing a federally preserved farm. PennEast considered different alternatives to avoid this crossing, and the adopted Deviation No. 1802 minimizes land use impacts and overall land requirements to avoid this crossing.

Deviation No. 1900 is located between MP 91.91 and 93.55 in Hunterdon County, New Jersey. This deviation has been adopted to incorporate a route optimization that avoids crossing the Lockatong Creek three times with an open cut. This deviation now allows the Project route to cross the Lockatong Creek using a trenchless method. Deviation No. 1900 also avoids impacts to both a federally preserved farm and a New Jersey Green Acres Program protected parcel.

An updated Google Earth kmz file and GIS shapefiles for the proposed route are attached to aide in your review and analysis of the Project. (To open the shapefiles, please add a ".zip" extension to the file and then extract the files.) Please let us know if you have any difficulty opening the attached files.

Deborah Poppel, CWB
Senior Ecologist/Project Manager
Impact Assessment & Permitting, Environment
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Pennsylvania Department of Conservation and Natural Resources

August 12, 2014

Ms. Rebecca Bowen
Chief, Ecological Services Section

PENNSYLVANIA DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
Bureau of Forestry, Ecological Services Section
400 Market Street, PO Box 8552
Harrisburg, PA 17105

Re: Large Project PNDI Review
PennEast Pipeline Company, LLC - PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania

Dear Ms. Bowen:

The PennEast Pipeline Company, LLC (PennEast), is a partnership with UGI Energy Services (UGIES), AGL Resources, NJR Pipeline Company, and South Jersey Industries. The PennEast Pipeline Project (Project) proposes to construct a new 100-mile, 30-inch pipeline to deliver natural gas from northeast Pennsylvania to other markets in Pennsylvania and New Jersey. This new supply of natural gas will bring lower cost supplies to residents and businesses in Pennsylvania and New Jersey, while enhancing pipeline system flexibility and reliability for the local gas utilities.

PennEast intends to file its certificate application for the PennEast Pipeline Project with the Federal Energy Regulatory Commission (FERC) in mid-2015, and anticipates receiving authorization and starting construction in 2017. Permit applications with other federal, state, and local agencies will be submitted within similar timeframes as the certificate application. The permit proceedings conducted by these agencies will provide additional opportunities for public input and involvement. FERC's determination of public convenience and necessity includes a thorough, comprehensive environmental review of proposed projects, working closely with federal, state, and local agencies and in accordance with the National Environmental Policy Act (NEPA).

On behalf of PennEast, URS Corporation (URS) is requesting a Large Project Pennsylvania Natural Diversity Inventory (PNDI) review update for rare, candidate, threatened, and endangered species under the jurisdiction of the Pennsylvania Department of Conservation and Natural Resources for the PennEast Pipeline Project. A critical issues analysis was conducted for multiple routes using readily available secondary source data to select the **Least**

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
Fax: 610.832.3501

Environmentally Damaging Practicable Alternative (LEDPA) route. Mapping depicting the environmental features evaluated for the preferred alternative is enclosed. We are asking for your review prior to the initiation of wetland and watercourse field surveys to be conducted this fall. We hope to concurrently identify any habitat for species under your agencies' jurisdiction at this time. The environmental study area will be a 400-foot corridor centered on the approximately 100-mile alignment. The anticipated permanent right-of-way (ROW) and temporary construction work area will be approximately 100-feet. The study area is wider than the disturbance area to allow for minor alignment shifts to avoid any sensitive resources that may be identified during the environmental field investigations.

The following are enclosed to facilitate your review:

- Large Project PNDI Form;
- PennEast Project Fact Sheet; and
- CD containing:
    - shapefiles of the alignment;
    - USGS 7.5 minute quadrangle maps with project alignment; and
    - detailed maps depicting the project areas and known secondary source resources

If you have any questions or require additional information regarding this request, please contact me at 610.832.1810 or bernard.holcomb@urs.com.

Sincerely,

Bernard Holcomb
Pipeline Environmental Services Manager
Enclosures (3)

cc: Mr. Anthony Cox (UGI)
Mr. Dante D'Alessandro (UGI)

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
Fax: 610.832.3501

Pennsylvania Natural Diversity Inventory
LARGE PROJECT FORM

How to Use the PNDI Large Project Form

If your Project is a "Large Project"— too large/long to search on the online system
Projects are considered "Large Projects" when the ENTIRE project is:

- Linear/Large Projects that exceed the PNDI online project size limits of 10 miles in length or 5165 acres
- Township-wide, Countywide or Statewide Projects. Examples: Act 537 Sewage Plans, Wind Farms, Roadway Improvements exceeding map limits above.

Due to system limitations and agency requirements, projects should not be submitted piecemeal. The entire project area including roads and infrastructure should be submitted as a single unit.

What to Send to Jurisdictional Agencies

Send the following information to all of the agencies listed on the Large Project Form.

Check-list of Minimum Materials to be submitted:
____Completed Large Project Form
____Supplemental project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.
____USGS 7.5-minute Quadrangle with project boundary clearly indicated, and quad name on the map

The inclusion of the following information may expedite the review process.
____GIS shapefiles depicting the project extent
____A basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)
____Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)
____Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams

PNDI Large Project Form Definitions

***Applicant*:** Person that owns the property or is proposing the project or activity

Contact Person: Person to receive response if different than applicant (e.g. Consultant)

Project Name: Descriptive title of project (e.g. Twin Pines Subdivision, Miller Bridge Replacement)

***Proposed Activity*:** Include ALL earth disturbance activities for project (e.g. for a timber sale—include stream crossings, cutting areas and new roadway accesses). Also include Current Conditions (e.g. housing, farmland, current land cover), and how Construction/Maintenance Activity is to be accomplished

Total Acres of Property: Entire site acreage (e.g. timber sale property—including road access (200 acres)

Acreage to be Impacted: Disturbance acreage (e.g. timber sale—if the property is 200 acres, but only 100 acres will be disturbed, for example: cutting on 90 acres, a road impacting 10 acres); include all temporary and permanent activities

Pennsylvania Natural Diversity Inventory
LARGE PROJECT FORM

This form provides site information necessary to perform an Environmental Review for special concern species and resources listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, the Pennsylvania Fish and Boat Code or the Pennsylvania Game and Wildlife Code.

Applicant Information

Name: Penneast Pipeline Company, LLC
Address: One Meridian Blvd., Suite 2c01 Wyomissing, PA 19610

Phone Number: 844-347-7119 Fax Number:

Contact Person Information - if different from applicant

Name: Bernie Holcomb
Address: 625 W. Ridge Pike, Suite E-100 Conshohocken, Pa 19428
Phone Number: 610-832-1810 Fax Number: 610-832-3501
Email: bernard.holcom

Project Information

Project Name: Penneast Pipeline Project
Project Reference Point (center point of project): Latitude: Longitude: Datum:
Municipality: Multiple County: Luzerne -- Bucks
☒ Attach a copy of a U.S.G.S. 7 ½ Minute Quadrangle Map with Project Boundaries clearly marked.
U.S.G.S. Quad Name: Multiple
Provide GIS shapefiles showing the project boundary (strongly recommended)

Project Description

Proposed Project Activity (including ALL earth disturbance areas and current conditions)

The PennEast Pipeline Project (Project) proposes to construct a new 100-mile, 30-inch pipeline to deliver natural gas from northeast Pennsylvania to other markets in Pennsylvania and New Jersey. This new supply of natural gas will bring lower cost supplies to residents and businesses in Pennsylvania and New Jersey, while enhancing pipeline system flexibility and reliability for the local gas utilities.

Total Acres of Property: 5118 Acreage to be Impacted: 1283

1. Will the entire project occur in or on an existing building, parking lot, driveway, road, maintained road shoulder, street, runway, paved area, railroad bed, or maintained lawn? Yes ☐ No ☒
2. Are there any waterways or waterbodies (intermittent or perennial rivers, streams, creeks, tributaries, lakes or ponds) in or near the project area, or on the land parcel? If so, how many feet away is the project?
   Yes ☒ Within Feet No ☐
3. Are wetlands located in or within 300 feet of the project area? Yes ☒ No ☐ If No, is this the result of a wetland delineation? Tbd
4. How many acres of tree removal, tree cutting or forest clearing will be necessary to implement all aspects of this project? Tbd

Dept. of Conservation and Natural Resources
Bureau of Forestry, Ecological Services Section
400 Market St., PO Box 8552
Harrisburg, PA 17105
fax: 717-772-0271

PA Game Commission
Bureau of Wildlife Habitat Management
Division of Environmental Planning & Habitat Protection
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

PA Fish and Boat Commission
Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823

US Fish and Wildlife Service
Endangered Species Biologist
315 South Allen St., Suite 322
State College, PA 16801
no faxes please

September 17, 2014 **PNDI Number: 22372**

Deboran Poppel
URS Corporation
Email: Deborah.poppel@urs.com (hard copy will NOT follow)

Re: PennEast Pipeline
New 100-mile 30-inch Pipeline
Luzerne, Carbon, Northampton, and Bucks Counties, PA

Dear Ms. Poppel,

Thank you for the submission of the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Receipt Number **22372** for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

The current proposed alignment will affect State Park Lands. If you have not already done so please contact Stephanie Livelsberger at slivelsberger@pa.gov or 717.783.3308 to facilitate coordination with DCNR Bureau of State Parks. This letter applies to PNDI impacts only and does not authorize the initiation of any work on State Park Land.

Potential Impact Anticipated

PNDI records indicate species or resources under DCNR's jurisdiction are located in the project vicinity. Based on a detailed PNDI review, DCNR determined potential impacts to the following threatened or endangered species or species of special concern.

Survey Request
There are species known nearby that use habitat type may be present on the site; therefore, we are requesting a qualified botanist conduct a survey for the species in the attached chart at *the appropriate time of year and then submitted to our office for review*. In the attached excel file "22372_PennEast_ResourceLists" the worksheet tab "Species Targets by Municipality" lists all resources in project vicinity and can be sorted by resource or township. The "Plant and Lepidoptera Info" tab provides habitat and flowering time information from *The Plants of Pennsylvania, 2nd Edition*, by Rhoads and Block and information about Lepidoptera gathered from the internet. Plant community information can be found under the "Community Info" worksheet tab.

Please note that the Lepidoptera species and communities noted are listed for informational purposes and are not targets for a survey. If these resources are observed onsite DCNR suggests voluntary avoidance and minimization, except on DCNR land where it may be required.

Your botanist should carefully review the new DCNR Botanical Survey Protocols available at http://www.gis.dcnr.state.pa.us/hgis-er/Login.aspx. These protocols are recommended to ensure that the all necessary information is collected and that survey reports are prepared properly. It is the expectation of DCNR that these protocols will be followed when conducting surveys for species under our jurisdiction. Contact our office prior to the survey for detailed information about the species, or for a list of qualified surveyors.

Any target and non-target state-listed species found during the site visit should be reported to our office. Mitigation measures and monitoring may be requested if species or communities of special concern are found on or adjacent to site. If the land type(s) does not exist onsite a survey may not be necessary; please submit a habitat assessment report which describes the current land cover, habitat types and species found onsite.

This response represents the most up-to-date review of the PNDI data files and is valid for two years. If project plans change or more information on listed or proposed species becomes available, our determination may be reconsidered. For PNDI project updates, please see the PNHP website at www.naturalheritage.state.pa.us for guidance. As a reminder, this finding applies to potential impacts under DCNR's jurisdiction only. Visit the PNHP website for directions on contacting the Commonwealth's other resource agencies for environmental review.

Should you have any questions or concerns, please contact Emilee Boyer Euker, Ecological Information Specialist at 717.787.7067 or c-eboyer@pa.gov.

Sincerely,

Rebecca H. Bowen

Rebecca H. Bowen, Section Chief
Bureau of Forestry, Ecological Services Section
Pennsylvania Natural Heritage Program

Resources in the vicinity of the PennEast Pipeline project, PNDI # 22372.

Species Name	Common Name	Species Name	Common Name
Ageratina aromatica	Small White-snakeroot	*Lycaena epixanthe* *	Bog Copper
Arabis hirsuta	Western Hairy Rock-cress	*Myrica gale*	Sweet-gale
Bartonia paniculata	Screw-stem	*Myriophyllum heterophyllum*	Broad-leaved Water-milfoil
Carex brevior	A Sedge	*Myriophyllum sibiricum*	Northern Water-milfoil
Carex disperma	Soft-leaved Sedge	*Papaipema sp. 1* *	Flypoison Borer Moth
Carex longii	Long's Sedge	*Phlox pilosa*	Downy Phlox
Carex paupercula	Bog Sedge	*Piptatherum pungens*	Slender Mountain-ricegrass
Carex polymorpha	Variable Sedge	Pitch pine - rhodora - scrub oak woodland *	
Carex sprengelii	Sedge	*Platanthera blephariglottis*	White Fringed-orchid
Cuscuta cephalanthi	Button-bush Dodder	*Poa languida*	Drooping Bluegrass
Cuscuta compacta	Dodder	*Poa paludigena*	Bog Bluegrass
Cyperus schweinitzii	Schweinitz's Flatsedge	*Polygonum careyi*	Carey's Smartweed
Cystopteris tennesseensis	Bladder Fern	*Potamogeton confervoides*	Tuckerman's Pondweed
Dicentra eximia	Wild Bleeding-hearts	*Potamogeton pulcher*	Spotted Pondweed
Eleocharis intermedia	Matted Spike-rush	*Prunus pumila var. depressa*	
Ellisia nyctelea	Ellisia	*Prunus pumila var. susquehanae*	
Ephemeral/fluctuating natural pool *		*Ranunculus aquatilis var. diffusus*	White Water-crowfoot
Epilobium palustre	Marsh Willow-herb	Red spruce palustrine woodland *	
Eurybia radula	Rough-leaved Aster	*Rosa virginiana*	Virginia Rose
Gaultheria hispidula	Creeping Snowberry	*Schoenoplectus subterminalis*	Water Bulrush
Hemipachnobia monochromatea *	Sundew Cutworm Moth	*Scirpus ancistrochaetus*	Northeastern Bulrush
Herbaceous vernal pond *		*Sedum rosea*	Roseroot Stonecrop
Iris cristata	Crested Dwarf Iris	*Solidago speciosa var. speciosa*	Showy Goldenrod
Juncus dichotomus	Forked Rush	*Sparganium angustifolium*	Bur-reed
Leatherleaf - cranberry peatland *		*Symphyotrichum ericoides*	White Heath Aster
Lupinus perennis	Lupine	*Utricularia cornuta*	Horned Bladderwort

* Please note that the Lepidoptera species and plant communities noted are listed for informational purposes and are not targets for a survey. If these resources are observed onsite DCNR suggests voluntary avoidance and minimization, except on DCNR land where it may be required.

Species Name	Common Name	Dallas Twp.	Kingston Twp.	West Wyoming Boro.	Wyoming Boro.	Jenkins Twp.	Plains Twp.
Ageratina aromatica	Small White-snakeroot						
Arabis hirsuta	Western Hairy Rock-cress						
Bartonia paniculata	Screw-stem						
Carex brevior	A Sedge						
Carex disperma	Soft-leaved Sedge	x	x	x			
Carex longii	Long's Sedge						x
Carex paupercula	Bog Sedge						
Carex polymorpha	Variable Sedge						
Carex sprengelii	Sedge						
Cuscuta cephalanthi	Button-bush Dodder						
Cuscuta compacta	Dodder						
Cyperus schweinitzii	Schweinitz's Flatsedge						
Cystopteris tennesseensis	Bladder Fern						
Dicentra eximia	Wild Bleeding-hearts						
Eleocharis intermedia	Matted Spike-rush						
Ellisia nyctelea	Ellisia						
Ephemeral/fluctuating natural pool *							
Epilobium palustre	Marsh Willow-herb						
Eurybia radula	Rough-leaved Aster						
Gaultheria hispidula	Creeping Snowberry						
Hemipachnobia monochromatea *	Sundew Cutworm Moth						
Herbaceous vernal pond *							
Iris cristata	Crested Dwarf Iris						
Juncus dichotomus	Forked Rush						
Leatherleaf - cranberry peatland *							
Lupinus perennis	Lupine						x
Lycaena epixanthe *	Bog Copper						
Myrica gale	Sweet-gale						
Myriophyllum heterophyllum	Broad-leaved Water-milfoil						
Myriophyllum sibiricum	Northern Water-milfoil						
Papaipema sp. 1 *	Flypoison Borer Moth						
Phlox pilosa	Downy Phlox						
Piptatherum pungens	Slender Mountain-ricegrass						
Pitch pine - rhodora - scrub oak woodland *							
Platanthera blephariglottis	White Fringed-orchid						

Poa languida	Drooping Bluegrass	
Poa paludigena	Bog Bluegrass	
Polygonum careyi	Carey's Smartweed	
Potamogeton confervoides	Tuckerman's Pondweed	
Potamogeton pulcher	Spotted Pondweed	
Prunus pumila var. depressa		
Prunus pumila var. susquehanae		x
Ranunculus aquatilis var. diffusus	White Water-crowfoot	
Red spruce palustrine woodland *		
Rosa virginiana	Virginia Rose	
Schoenoplectus subterminalis	Water Bulrush	
Scirpus ancistrochaetus	Northeastern Bulrush	
Sedum rosea	Roseroot Stonecrop	
Solidago speciosa var. speciosa	Showy Goldenrod	
Sparganium angustifolium	Bur-reed	
Symphyotrichum ericoides	White Heath Aster	
Utricularia cornuta	Horned Bladderwort	x

* Please note that the Lepidoptera species and communities noted are listed for informational purposes and are be required.

Bear Creek Twp.	Kidder Twp.	Penn Forest Twp.	Towamensing Twp.	Lower Towamensing Twp.	Moore Twp.	East Allen Twp.	Upper Nazareth Twp.	Lower Nazareth Twp.	Bethlehem Twp.
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not targets for a survey. If these resources are observed onsite DCNR suggests voluntary avoidance and minimi

Lower Saucon Twp.	Williams Twp.	Durham Twp.	Riegelsville Boro.
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ization, except on DCNR land where it may

PennEast Pipeline Company LLC (PennEast)
PennEast Pipeline Project

Pennsylvania Department of Conservation and Natural Resources (DCNR)
Summary of Initial Concerns
For a Pre-Survey Meeting March 18, 2015
Weiser State Forest – Forest District Office

1) ***Justification of Need***

DCNR - Bureau of Forestry

The Conservation and Natural Resources Act (act of June 28, 1995, P.L. 89, No. 18) provides DCNR with the authority to grant rights-of-way for pipelines or transmission corridors "… when it shall appear to the department that the grant of a right-of-way will not so adversely affect the land as to interfere with its usual and orderly administration, and when it shall appear that the interests of the Commonwealth and its citizens will be promoted by such grant."

Please indicate how the right of way request addresses both of the above conditions.

DCNR - Bureau of State Parks

The Administrative Code of 1929, Section 514 (AC 1929) provides DCNR with the authority to grant rights-of-way for pipelines or transmission corridors across State Park boundaries for public service utility lines regulated by PA Public Utility Commission (PUC).

Please indicate how the right of way request would meet the above condition.

Pursuant to the Conservation and Natural Resources Act, part of the Bureau's primary mission is to maintain, improve and preserve State parks as public natural resources. In managing State parks, the Bureau is to make available natural areas of unusual scenic beauty to promote healthful outdoor recreation and education and to provide facilities necessary for such purposes, while attempting to conceal the hand of man.

Please indicate how the right of way request would address the mission of the state parks system as outlined above.

As outlined in the *Departments Guidelines for Right of Way Development on PA State Forest and State Park Lands*, DCNR considers all State Parks, Natural and Wild Areas undesirable sites for ROW.

What efforts would PennEast be willing to undertake to minimize impacts or to enhance the unique values that state parks systems provide?

2) ***Route Planning***

FRANCES SLOCUM, HICKORY RUN, BELTZVILLE, DELAWARE BUREAU OF STATE PARKS (BUREAU)

To preserve the natural setting, soundscapes and viewsheds of state parks, the Bureaus goal is to limit the impacts to State Park natural, historical, cultural, educational, and recreational resources from the extraction of oil and gas resources, pipeline right-of-ways and seismic surveys. While the Bureau respects the extraction and development of oil and gas resources and the rights of mineral holders, all alternative pipeline routes that circumvent Pennsylvania State Parks should be considered.

a) Land and Water Conservation Fund

The Land and Water Conservation Fund (LWCF) requires the land be retained for public outdoor recreation. Conversions are prohibited, EXCEPT for "underground utility easements that do not have significant impacts upon the recreational utility of the park" (LWCF Grants Manual, ch, 675.9, Par 3(A)(5)(a)). Generally, LWCF has considered utilities construction periods of less than 12 months as not constituting any sort of conversion. **Therefore, provided PennEast's construction timeline is under 12 months, and there are no permanent surface structures, LWCF restrictions would not be applicable.**

i) PennEast would need to provide detailed construction plans to the Bureau of State Parks to include time line.

ii) LWCF would apply to Frances Slocum, Hickory Run and Beltzville State Parks.

<u>*Frances Slocum State Park*</u> - The proposed preferred alignment does not fall within an existing right of way (ROW). The proposed pipeline would require a new greenfield corridor further fragmenting and segmenting these areas of the park. The Bureau will seek land of equivalent value to the park to replace the land utilized for the pipeline project unless PennEast utilizes a ROW that was in existence when the park land was acquired.

What other alternate route(s) have been considered in terms of new greenfield corridor off of DCNR lands; collocation within or in paralleling existing right of way corridors?

<u>*Hickory Run State Park*</u> - The proposed preferred alignment collocates within or parallels an existing ROW. If PennEast would require an expansion of the ROW or create a new greenfield ROW (further fragmenting and segmenting these areas of the park), the Bureau will seek land of equivalent value to the park to replace the land utilized for the pipeline project unless PennEast utilizes a ROW that was in existence when the park land was acquired.

<u>*Beltzville State Park*</u> - The Bureau of State Parks is a lessee of the land from ACOE and does not have the authority to grant a ROW.

a. *What alternate route(s) have been considered in terms of collocating with existing right of way facilities?*
b. *What alternate route(s) have been considered in Beltzville in terms of parallel existing corridors?*
c. What major or minor reroutes is PennEast willing to consider in terms of in or outside of the 400 ft. study corridor?

b) WEISER STATE FOREST - PENN FOREST TRACT (PFT)

i) Assessments of disturbance acreage have been identified for the preferred route of 4.33 acres (50ft.) and 8.85 acres (100 ft.) for the PFT.

a. *What alternate route(s) have been considered in terms of collocating with existing right of way facilities?*
b. *What alternate route(s) have been considered on the PFT in terms of parallel existing corridors?*
c. What major or minor reroutes is PennEast willing to consider in terms of in or outside of the 400 ft. study corridor?

ii) Are there any currently known influences that may cause route deviations, whether major or minor, from the preferred alignment of the PFT? If so, what influence(s) would it have on the PFT portions or nearby private lands?

3) Design and Construction

Please present a brief description or overview of the PennEast pipeline construction process.

a) PennEast is encouraged to employ long-term planning and consider pipeline installation which will accommodate current and future needs. PennEast identifies having executed long-term binding precedent agreements with eight (8) shippers for 78% of firm transportation as a result of this project. As indicated many of the shippers have provided rationale in terms of committing to Project capacity, thank you for supplying this detail.
i) Have additional shippers, electricity generators or local distribution companies signed binding agreements since the last August Open Season?
ii) Please provide the current status of the proposed pipeline facilities full capacity subscription.
iii) In the longer term, if a need arises to increase capacity transport ("Future Expansion"), what pipeline infrastructure design or siting options would PennEast consider or be willing to explore?

b) The minimization of the right-of-way project footprint, temporary construction workspace and legal "operational or maintained" corridor widths are of importance to DCNR. DCNR needs more clarity on the proposed footprint.
   i) How close is PennEast willing to site the proposed pipe near existing utility lines (pipelines, overhead electric lines, etc.)?
   ii) In reference to 100 feet of total workspace requested, how much of an existing right of way corridor space will PennEast be willing to use as workspace?
   iii) What is the projected acreage amount of new forest clearing necessary to achieve the 50 ft. operational width?
   iv) What relationships with other operators have been established by PennEast in terms of siting infrastructure adjacent to other existing utility right of way corridors or specific utility facilities?
   v) What would be the burial depth and fill material depth above the pipeline for the open trench segments and, the planned burial depth for Directional Drilling Areas?

c) The use of additional temporary workspace associated with stream crossings, wetland crossings or in negotiating other sensitive features in conjunction with right of way construction must be justified and minimized to the extent where safety and workability are not jeopardized.

d) Above ground infrastructure
   i) Compressor stations are predominately incompatible with State Forest or State Park resources, uses and values; and as such, are preferred to be located off of State Forest and State Park land. The sole Compression Station serving the pipeline is currently planned to be located off of DCNR lands. The proposed site for the UGI HAZ Delivery Point-Compressor Station is approximately 9,000 feet from the Hickory Run State Park. Additionally it is in very close proximity to state game lands for in which unique public land uses and values also exist. There is a reasonable expectation that state of the art measures will be employed to not alter the park user experience and retain the wild character of the rural forested area:

      (1) What noise sensitive methods, technologies or state of the art measures will be utilized to minimize noise or keep noise levels low?
      (2) Reference is made to alternate Compressor Station sites between MP 25.2 and 27; this would be much closer to the nearby Hickory Run SP. What is the status of the one sole compressor station siting location?

   ii) Pipeline facility siting can be intrusive to the ecosystem, natural wild character, aesthetic value and potentially impacts the recreational park or forest users, etc., their siting remains important to DCNR:
      (1) Are there any known location changes of the proposed facilities?

(2) Although associated valve, launcher and receivers are planned to site within the as-built pipeline corridor itself, are any of these facilities planned to site on the DCNR segments of the pipeline corridor?
(3) Pipe yards have not yet been identified in terms of their location to DCNR property. Would the pipe yards site in relation to the right of way corridor or access roads on DCNR lands, and if so, are there any updates available of their planned locations?
(4) If the expressed cathodic protection system is planned for DCNR land segments, we desire to be informed of the anode bed and test station locations perhaps coincident with the Draft Filing to FERC.

e) *How will industrial wastes and toxic substances be managed?*

f) *Are there any updates to the overall project acreage impacts in regards to total area disturbance and an as built operational acreage footprint?*

g) If blasting is anticipated during construction state and federal safety standards are expected to be followed; State Park Managers and/or the District Forester must receive 14 days advance notice.

4) Recreational Impacts

a) The following roads, trails or unique areas appear to be impacted by the proposal.

FRANCES SLOCUM STATE PARK

i) The proposed pipeline impacts Moconaquah Trail, a highly used mountain bike trail.
ii) Construction activities should not restrict visitor access.

HICKORY RUN STATE PARK

Hickory Run State Park and the Boulder Field are highly used recreational areas. The Boulder Field is a National Natural Landmark.

i) An aesthetic buffer, limiting tree removal, should be maintained at 300 feet from the Boulder Field.
ii) Construction activities should not restrict visitor access.

BELTZVILLE STATE PARK

The proposed route crosses Christman Trail, Cove Ridge Trail, Falls Trail, the Waterfall Area and Wild Creek Cove, all are highly used recreational areas.

i) A 300 ft recreational and aesthetic buffer should be maintained at the trail.
ii) All tops, brush and debris shall be pulled back on either side of the trail corridor.
iii) Seasonal restrictions are a consideration.
iv) Construction activities should not restrict visitor access.

DELAWARE CANAL STATE PARK

The Delaware Canal, established as the Delaware & Lehigh National Heritage Corridor, is a Registered National Historic Landmark and its towpath is a National Recreation Trail. BMPs for trail crossings must be employed.

i) The best options for crossing must be explored. Whether open cut, directional drilling or a boring method is chosen, the method must be discussed with the State Park Manager prior to commencing construction for this crossing.

ii) If the HDD method is utilized, equipment staging areas, entrance and exit pit locations or surface drilling rig footprint areas must be presented to and first discussed with DCNR State Park Manager prior to permitting and construction.

WEISER STATE FOREST – Penn Forest Tract

(1) Stoney Mountain Road (Township paved road)
(2) Sawmill Trail Road (Z3 administrative road)
(3) Penn Forest Trail Road (Z3 administrative road)
(4) Rebold Trail Haul Road (Z3 administrative road)

The operator must notify the Department in writing when work is expected to begin in these areas and the anticipated operational period. The operator will provide notices of temporary changes and closures to the Department who will notify trail associations and local media.

b) Aesthetics management zones are applied to State Forest or State Park lands where connectivity and aesthetics are among primary values. As such, the following setbacks apply wherein all woody debris (ex. stumps, brush, slash, tree tops, etc.) must be pulled back from each side of the identified resource:

FEATURE	**SETBACK DISTANCE** WOODY DEBRIS	**SPECIAL CONDITION** (in addition to setback distance)
District Trail	25 Feet	
Boundary Line (State Forest/Park)	25 Feet	No tree tops or slash-woody debris shall be left in, on, or within a DCNR boundary line.
State Park Trail	50 Feet	No tree tops or slash-woody debris shall be left in, on, or within a state park trail or its corridor (*hiking, biking, etc*.).
Public Use Road (Z1)	(a) 50 Feet - setback (b) 100 Feet - lopping	Tree tops, brush, slash or woody debris within 100 feet of the resource feature must be lopped to three inches in diameter and scattered evenly over the ground.

c) Unauthorized use of ROW corridors by off-road vehicles is a constant struggle to enforce. *What measures would PennEast undertake to minimize this problem?*

d) PennEast should be aware that the resulting pipeline corridor may be utilized for approved recreational trails to include motorized recreation such as snowmobiles.

5) Operational Impacts

a) Please identify all State Forest/State Park Roads which are anticipated to be utilized during construction and any potential access routes for future operational maintenance.

i) State Forest Road Use Agreements must be secured for this activity.

ii) State Forest Roads utilized during construction may require improvements/upgrade.

(1) The District Forester/State Park Manager typically develops specifications regarding necessary improvements (culverts, grading, road material, gates/barricades, etc.); such details are communicated in a License exhibit, and/or a Road Use Agreement, provided by the District Forester or State Park Manager and further addressed during a Pre-Construction Work Meeting with DCNR.

FRANCES SLOCUM STATE PARK:

The proposed pipeline would cross Green Road at the park boundary, allowing for an increased potential for illegal access to the park by ATV traffic. DCNR would require closure of any access points to the park.

(2) Road access within the pending right-of-way or in any existing right of way being collocated may also require improvements and acceptable Revegetation or site restoration efforts.

iii) State Parks are high recreational use areas, and pipeline construction work schedule(s) may incur seasonal restrictions based on recreational use. Construction activities should not restrict public access to the park. Written approval must be obtained from the Park Manager prior to conducting operations in the park. It is also important to maintain the aesthetic value of trails and other use areas.

b) Please identify all proposed access roads requiring new construction.

i) Roads must be constructed according to State Forest road building specifications.

ii) Gates, barricades or a combination of both may need to be installed and according to State Forest specifications at the discretion of the District Forester/Park Manager.

iii) It is recommended to consult with the District Forester/Park Manager regarding potential locations of available road building materials.

c) DCNR Road – Right-of-Way Pipeline Crossings:

i) PennEast must notify the DCNR in writing prior to commencing work in those areas where pipeline construction involves crossing a state forest/park road.

ii) The operational period must be expressed and a willingness to work together to reduce associated forest/park user conflicts is expected.

iii) PennEast must provide notices of temporary changes and closures to the DCNR who will notify forest or park user groups such as the *Pocono Whitewater, Keystone Trail Association, PA Snowmobile Association, etc. and* other impacted lessees, licensees and local media.

iv) The operator must provide the necessary security, safety, and signage measures during these operations at its own expense.

v) The following guidance would apply:

(1) State Forest Public Roads (Z1):
A trenchless method for crossing Public Use Roads should be considered; written permission from the District Forester/Park Manager must be obtained prior to utilizing an open cut method.

(2) State Forest Drivable Trails (Z2) or Administrative Roads (Z3):
Crossings of Drivable Trails and Administrative Roads may be made by open trench method unless otherwise specified in writing by the District Forester/Park Manager or designee.

d) DCNR Road Closures:
Appropriate safety measures must be utilized wherever possible to protect the usage of the forest/park roadways (Z1 and Z2) by recreation-based user groups (hiking, biking, horseback riding, hunters, etc.).

i) PennEast must provide the necessary security, safety, and signage measures during these operations at its own expense.

ii) PennEast must notify DCNR in writing when work is expected to begin and identify the intended operational period.

iii) PennEast must provide notices of temporary changes or closures to DCNR, who will notify user groups such as the *Pocono Whitewater Keystone Trail Association, PA Snowmobile Assoc., etc.* and other impacted lessees, licensees and local media.

e) PennEast must provide padded pipeline crossings at locations identified by the District Forester/Park Manager.

f) Routine or periodic entry on to DCNR administered lands for operational maintenance purposes is anticipated during the life of the right of way corridor.

i) What on-the-ground markers are anticipated in terms of aircraft flight inspections?

ii) What would be the anticipated mowing schedule for the proposed pipeline?

iii) A 30 ft. cleared area over the pipe is planned for non-wetland areas; the District Forester or Park Manager may request that a narrower clearing be maintained in sensitive areas, special species of concern areas or to retain a particular habitat component.

iv) The DCNR District Forester and/or State Park Manager will require notification in writing well in advance of scheduled ground entry for routine facility or vegetative right of way maintenance.

6) ***Silvicultural Impacts***

a) The limits of disturbance need to be clearly identified in the field to facilitate valuation of timber damages.

b) Timber damages will be assessed at double stumpage value or on a flat per-acre rate basis; final determination will be made by the District Forester/Park Manager.

i) Upon payment of the timber invoice, timber rights would be vested in the applicant.

ii) If the timber is not removed from the site within 60 days, timber rights would then revert to the Commonwealth. The 60-day reversion period may be extended at the discretion of the District Forester/Park Manager.

iii) Timber must be decked/landed at a location approved by the District Forester/Park Manager.

(1) The engagement utilization of local wood producers and consumers is highly encouraged.

(2) It is also recommended that forest products removed during construction are completely utilized.

c) *Please identify an anticipated stump/slash/debris management plan.*

d) Invasive species plant management is expected to be addressed by PennEast and meet the DCNR's administrative protocol and guidelines.

7) Water Quality Impacts

a) DCNR has adopted aquatic habitat buffers to assure water resources receive adequate protection. While the DCNR is cognizant that complete avoidance of aquatic resources is sometimes impractical, encroachment upon these resources will require mitigation and a waiver request. Avoidance or mitigation measures should be discussed during the planning phase of the project. The waiver, if necessary, is addressed and justified as part of the State Forest Environmental Review. Future pipeline maintenance will be expected to adhere to our buffer guidance.

b) The following streams may be impacted by the project:

i) **WEISER STATE FOREST**

(1) The small tributary, Yellow Run, originating from the Yellow Run Barrens portion of the Penn Forest Tract is a part of the Stoney Creek basin – an Exceptional Value (EV) water.

(2) The small tributary, Engler Run, originating from the south-south eastern portion of the Penn Forest Tract is a part of the Wild Creek basin – an Exceptional Value (EV) water.

The Bureau of Forestry requires a 135-foot buffer between disturbance and EV streams. DCNR expects that the width of the ROW be reduced to the greatest extent possible within 135 feet of the stream crossing. Special riparian restoration would be required within 135 feet of the stream crossing.

(3) The Penn Forest Tract contains portions of two County Natural Heritage Areas as defined in the Carbon County Comprehensive and Greenway Plan – the *Yellow Run Barrens* and a portion of the *Penn Forest/Wild Creek Reservoir*.

Further consultation would be expected by PennEast with the Carbon County - Office of Planning and Development in relation to the Carbon County Comprehensive and Greenway Plan.

ii) **HICKORY RUN STATE PARK**

The proposed route crosses Mud Run and Stony Creek.

(1) Mud Run is a designated HQ-CWF (High Quality Cold Water Fishery) stream.

DCNR requires a 30-foot no disturbance buffer and an additional 105-foot minimal-disturbance buffer on HQ streams. The DCNR expects that the width of the ROW be reduced to the greatest extent possible within 135 feet of the stream crossing. Special riparian restoration would be required within 135 feet of the stream crossing.

(2) The Stony Creek is designated EV (Exceptional Value).

DCNR requires a 135-foot buffer between disturbance and EV streams. The DCNR expects that the width of the ROW be reduced to the greatest extent possible within 135 feet of the stream crossing. Special riparian restoration would be required within 135 feet of the stream crossing.

iii) **BELTZVILLE STATE PARK**

The proposed route crosses one special protection Exceptional Value (EV), Pohopoco Creek. The crossing at Pohopoco Creek and Beltzville Lake are inside the park boundaries.

DCNR requires a 135-foot buffer between disturbance and EV streams. The DCNR expects that the width of the ROW be reduced to the greatest extent possible within 135 feet of the stream crossing. Special riparian restoration would be required within 135 feet of the stream crossing.

iv) **DELAWARE CANAL STATE PARK**

(1) *Both pre-boring and post-boring canal and canal structure condition reports will be required for 1 mile north and 1 mile south of the crossing site. These condition reports are to be completed by a qualified*

independent company approved by DCNR. DCNR must be notified of the approved depth of the bore prior to construction.

(2) PennEast is required to present a plan, timelines and project details to the *Delaware Canal Advisory Committee.*

c) DCNR should be involved and informed in the planning process for all stream crossings, including a discussion of the most appropriate method for the crossing (e.g., whether by open cut trenching or the directional boring method (HDD), etc., share findings of geotechnical survey results). This consultation should occur - before necessary stream crossing permits are submitted to the appropriate jurisdictional authority and prior to construction commencement.

i) PennEast should provide the Department with their BMPs on stream crossing practices and planned crossing methodology.

ii) If the HDD method is utilized, equipment staging areas, entrance and exit pit locations or surface drilling rig footprint areas must be presented to and first discussed with DCNR prior to permitting and construction.

d) Wetlands are a critical resource and should be avoided. DCNR expects every effort to be made to avoid impacting wetlands, including riparian wetlands and vernal ponds. However, in cases when complete avoidance is not possible, DCNR requests a summary of anticipated wetland impacts along with a description of any avoidance, minimization, or mitigation measures that were considered in the planning process or as identified during pending survey work. This information should be incorporated in the responses to the SFER

(1) The DCNR expects a 200-foot no-disturbance buffer from any wetland, vernal pool, spring seep, other wet areas or any other body of water. In addition, DCNR expects a 300-feet no-disturbance buffer from a wetland, vernal pool, spring seep or other wet areas with threatened and endangered species and species of special concern. These buffers are as described in DCNR's Guidelines for Administering Oil and Gas Activity on State Forest Lands.

(2) The results of wetland delineations should be provided to the DCNR as part of the SFER submittal (ArcGIS shapefile preferred).

(a) Wetland delineations are typically required for the limits of disturbance by the jurisdictional authority. In order to be protective of established buffers, DCNR requests additional delineations extending 200-feet beyond the limit of disturbance given the presence of either hydric soils or soils with hydric components (NRCS Soil Survey) or National Wetland Inventory (NWI) classified wetlands (USFWS). Due to potential inaccuracy in the mapping of hydric soils or NWI wetlands, delineations should extend 100 feet beyond the hydric

soils/NWI wetland boundaries or where any other wetland indicators are revealed through a desktop review or field investigation. Wetland delineations should be conducted using the Army Corp of Engineers protocol by qualified individuals.

(3) Anticipated wetland crossing construction methods should be identified for each wetland and discussed with DCNR before necessary wetland crossing permits are submitted to the appropriate jurisdictional authority and prior to construction commencement.

(4) In addition to addressing jurisdictional wetland impacts for the appropriate jurisdictional authority, DCNR may require PennEast to conduct additional mitigation in association with any temporary wetland impacts that would occur on DCNR lands. Specific mitigation measures would be at the discretion of the Department.

8) Other Ecological Concerns

a) Please provide updates regarding correspondence with the following PNDI jurisdictional authorities and describe requested surveys/actions:
   i) US FWS
   ii) DCNR
   iii) PGC
   iv) PF&BC

b) As the land manager for State Forest and Park lands, DCNR may request surveys for species and/or their associated habitats which exceed those required by the jurisdictional agency. DCNR may have concerns for species under the jurisdictional authority of other agencies in regards to this proposal. Depending on the updates provided by PennEast on PNDI correspondence, DCNR may request additional surveys.

FRANCES SLOCUM; BELTZVILLE; AND DELAWARE CANAL STATE PARKS

- *The proposed pipeline would cross an ecological buffer for PNDI species of concern. DCNR may require additional surveys.*

HICKORY RUN STATE PARK

- *The proposed pipeline will cross Mud Run, Boulder Field and Mud Swamp Natural Areas, additional surveys may be required.*
- *The proposed pipeline would cross an ecological buffer for PNDI species of concern. DCNR may require additional surveys.*
- Hickory Run State Park is one of the largest tracts of un-fragmented or contiguous forested areas in the Pocono Plateau. Hickory Run State Park

is designated as an Important Bird Area (IBA's) for its significance to migratory birds and birds requiring deep forest habitat. IBA's are the most critical regions in the Commonwealth for conserving bird diversity and abundance, and are the primary focus of Audubon Pennsylvania's conservation efforts. Construction and maintenance of the ROW should minimize effects on birds and bird habitat.

-

DELAWARE CANAL STATE PARK

- *The DELAWARE CANAL - As a national Historic Landmark, DCNR requires PennEast to submit and review the project with federal and state historic and archeological agencies and include DCNR on all correspondence.*
- *DCNR may require additional surveys.*

WEISER STATE FOREST

- *The proposed pipeline will cross the Penn Forest Tract, which includes a Public Wild Plant Sanctuary and crosses several ecological buffers for PNDI species of concern as well as Appalachian climbing fern. This is a species of some conservation concern but is not a PNDI species.*
- *DCNR may require additional surveys.*
- The Yellow Run Barrens is a unique wild plant sanctuary; DCNR may have additional restoration and reclamation requirements, for instance, such as the application of a specific native seed mix during a specific time of year - April/May.
- *Golden winged warblers* occur on the Penn Forest Tract in the Yellow Run Barrens. The DCNR and its sister agency the PA Game Commission desire to improve habitat for the Golden winged warbler.
  - *If awarded a license agreement, PennEast should anticipate conducting Golden wing warbler habitat enhancement and/or perform measures to protect its habitat during pipeline construction or in performing future right of way maintenance activities.*

c) Invasive species are of high concern to DCNR during construction and for the long-term usage of right of way corridors. PennEast should conduct BMPs to limit the introduction of invasive species, such as:

i) Washing equipment prior to bringing on state forest land,
ii) Planning work sequence such that areas known to be infested with invasive species are worked in after non-infested areas,
iii) Using certified weed-free seed,
iv) Using certified weed-free mulch, gravel, and fill.
v) *Japanese Stilt Grass is an invasive species expected to be encountered on the Weiser State Forest, how does PennEast typically treat invasive species?*
vi) The ROW agreement would include special provisions for the post-construction monitoring and control of invasive species which will be PennEast's responsibility.

vii) DCNR has final approval of invasive species management plans, vegetation management, and restoration/rehabilitation efforts. DCNR uses vegetation that is native to the park/forest or immediate surrounding area. Any exceptions require explanation and approval by DCNR.

d) Several species of bats utilize state forests and parks as habitat. Due to white-nose syndrome, many bat species have experienced over 90% mortality. The northern long-eared bat is under consideration by the U.S. Fish and Wildlife Service for Federally-listing.
   i) In addition to tracking Indiana bats, DCNR requests that any northern long-eared bats that are captured on DCNR land be radio-tracked to locate roosts, as is typically requested for Federally-listed species.
   ii) DCNR requests that any state-listed bat species be radio-tracked as well. These would include the silver-haired bat (candidate-rare), evening bat (candidate-rare) and the eastern small-footed bat (PA-threatened).
   iii) At least one emergence count should be conducted at identified roosts.
   iv) Data should be collected in accordance with FWS and PGC guidelines.

f) The DCNR may request additional habitat enhancement for the S*nowshoe Hare, Northern Flying Squirrel, etc*.

9) Other

a) All right-of-way applicants must provide DCNR with electronic ArcGIS shape files of all data collected, including but not limited to:
   i) wetland delineations
   ii) aquatic resources
   iii) species/natural community surveys
   iv) potential habitat for species of concern
   v) invasive plant species inventories
   vi) pipeline centerline, permanent legal right of way width(s), temporary workspace, and additional temporary workspace.

This information would need to be submitted prior to, and is a requirement for, the drafting of a pending *License for ROW Agreement*.

b) Project status updates are requested on other areas of the project off of DCNR lands so that DCNR may be aware of the project's timeline and other issues affecting the project.

March 30, 2015

Mr. Frederick Sechler, Jr.
Department of Conservation and Natural Resources
400 Market Street
P.O. Box 8552
Harrisburg, PA 17105

Dear Mr. Sechler:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Spectra Energy Partners; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. Over the past months, PennEast has worked to refine a preferred alternative route and to obtain permissions to survey. To that end, we must inform you that the preferred alternative route has again been adjusted to account for engineering, environmental, and land use constraints that have been identified since we last provided your agency with detailed project mapping on January 14, 2015.

Following feedback from FERC's scoping meetings and numerous conversations with landowners, state and local agencies, and other various stakeholders, PennEast has revised and refined various portions of the preferred alternative route. The largest variations to the previously released route are related to the location of the crossing of the Bethlehem Authority water supply mainline (MP 44 and MP 45), Appalachian Trail crossing (between MP 46 and MP 55), and accommodating future subdivision and housing development plans. Additional field data gained over the last month has helped make smaller adjustments related to environmental surveys and individual discussions with landowners.

In addition to the route variations noted above, an additional interconnect was needed for the Gilbert Power Generation facility in Holland Township, New Jersey, which is fed by a small lateral (12 inches) to supply natural gas to the facility. The previously located interconnection with Elizabethtown Gas was relocated so that both interconnects can be co-located within the power station's industrial property to minimize additional above-ground impacts.

A summary of the significant route variations in Pennsylvania is provided below:

- In Towamensing Township in Carbon County, PA, less than one mile of the alignment has been re-routed ¼-mile to the east as a result of consultations with the Bethlehem Authority (Authority). The alignment has been re-routed between mileposts 44 and 45 to cross the Authority's water supply mainline in a location where it is deeper in an effort to maximize protection of the Authority's resources.

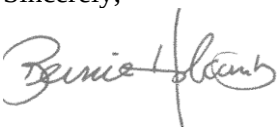
- Straddling the Carbon – Northampton County line in PA, approximately 8 miles of the alignment between mileposts 46 and 55 has been re-routed up to 1 mile to the west of the previous route in an effort to refine the crossing location of the Appalachian Trail.

- In Northampton County, PA, approximately 2.5 miles of the alignment has been re-routed less than ½-mile to the north of the previous route as a result of consultations with private landowners and local officials. The alignment has been re-routed between mileposts 59 and 62 to accommodate current and future land use plans in the area.

Updated GIS shapefiles for the entire new preferred alternative route are being provided to aide in your review and analysis of the project.

We look forward to continuing to work with you and your colleagues on this important project. Please contact me if you have any questions.

Sincerely,



Bernie Holcomb
Pipeline Environmental Services Manager

URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com

pennsylvania
DEPARTMENT OF CONSERVATION
AND NATURAL RESOURCES

BUREAU OF FORESTRY

April 6, 2015 **PNDI Large Project Number: 022426**

Bernie Holcomb
URS Corporation
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428
Email: Bernard.holcomb@urs.com (hard copy not to follow)

Re: PennEast Pipeline Reroute (update)
Multiple Municipalities, Luzerne, Carbon, Northampton and Bucks Counties

Dear Mr. Holcomb,

Thank you for the submission of the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Large Project # **022426** for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources of concern under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

Potential Impact Anticipated

PNDI records indicate species or resources of concern are located in the project vicinity. Based on a detailed PNDI review, DCNR determined potential impacts to the following threatened or endangered species or species of special concern. Please note our new survey protocols are available at http://www.gis.dcnr.state.pa.us/hgis-er/Login.aspx.

Scientific Name	**Common Name**	**PA Current Status**	**PA Proposed Status**	**Township, County-GIS Area of concern (AOC), Approximate but not exact GPS Coordinates**
Platanthera blephariglottis	White-fringed orchid	Not listed	Endangered and ***sensitive species***	**Area 5**:Penn Forest Township, Carbon County, west of Mud Swamp- several occurrences documented within proposed pipeline
Carex polymorpha	Variable sedge	Endangered	Threatened	**Area 3**: Penn Forest Township, Carbon County, Keipers Run, Hickory Run SP- -75.612, 40.000- **Area 6** : Penn Forest Township, Carbon County, Weiser State Forest,

				-75.631, 40.957, documented within proposed pipeline
Bartonia paniculata	Screw-stem	Rare	Rare	**Area 3**: SGL 129 and just south: -75.627, 41.075-2 occurrences documented within proposed pipeline corridor- **Area 5**: Penn Forest Township, Carbon County, Mud Swamp, Hickory Run SP- -75.620, 40.983- occurrence documented within proposed pipeline- **Area 6**- Penn Forest Township, Carbon County, Weiser State Forest, -75.631, 40.952, documented within proposed pipeline
Carex collinsii	Collin's sedge	Endangered	Threatened	**Area 5**:Penn Forest Township, Carbon County, west of Mud Swamp- -75.620, 40.983- potential habitat
Eurybia radula	Rough-leaved aster	Not listed	Threatened	**Area 6**:Penn Forest Township, Carbon County, Weiser State Forest, -75.631, 40.952, documented within proposed pipeline
Gaultheria hispidula	Creeping snowberry	Rare	Rare	**Area 1**: Mud Pond-Mosey Wood Pond, Kidder Township, Carbon County- -75.655, 41.075- suitable habitat **Area 2**: West of SGL 129, -75.629, 41.051-suitable habitat
Myrica gale	Sweet gale	Threatened	Threatened	**Area 1**:Mud Pond-Mosey Pond,

				Kidder Township, Carbon County- -75.657, 41.077- suitable habitat
Carex paupercula	Bog sedge	Threatened	Rare	**Area 1**: Mud Pond-Mosey Pond, Kidder Township, Carbon County- -75.657, 41.077- suitable habitat
Dicentra exima	Wild-bleeding hearts	Endangered	Endangered	**Area 7**: Towamensing Township, Carbon County, Beltzville State Park- -75.559, 40.886- suitable habitat
Potamogeton pulcher	Spotted pondweed	Endangered	Endangered	**Area 8:** Moore Township, Northampton County, SGL 168- -75.491, 40.886- suitable habitat

Survey Request

DCNR requests a **survey** for the following species only if timber harvest/shrub/herbaceous cutting will occur within the next two years from this letter:

- *Plathanthera blephariglottis* (white-fringed orchid)–habitat is bogs, peaty wetlands and swamps, particularly on floating sphagnum moss mats surrounding bog pools–locally documented at the bottom of an open slope in saturated to wet mesic soil–just outside the boundary of Hickory Run SP- flowers in June-August–for more information, please see http://www.naturalheritage.state.pa.us/factsheets/15445.pdf.
- *Carex polymorpha* (Variable sedge)–habitat is typically moist, peaty acidic areas where the forest is dominated by *Quercus alba* or *Acer rubrum* and the canopy is 70-90%.–locally documented along a small stream in a forested valley—also documented in a mixed red-maple-red oak-hemlock open woods along Pinoak Run with seepy sphagnum areas–flowering stems first appear in May and remain intact through the summer with the fruits persisting in place–for more information, please see http://www.naturalheritage.state.pa.us/factsheets/15108.pdf.
- *Bartonia paniculata* (screw-stem)–habitat is bogs and peaty bog margins–locally documented as a small population on the border of Hickory Run SP and SGL # 129 and found within two small areas along the pipeline ROW, mostly in the ruts of the access road–locally documented in a forested valley along a small stream–also documented within a pipeline ROW with well-drained and poorly drained sections as well as sandy soil, Yellow Run area of Hickory Run SP area-flowers in August–October-
- *Carex collinsi* (Collin's sedge)–habitat is sphagnum moss in acidic swamps and wet woods, often where conifers are a prominent part of the canopy–locally documented in a red maple-hemlock-highbush blueberry sphagnum peat forest of Mud Swamp–locally documented from late June – mid August–for more information, please see http://www.naturalheritage.state.pa.us/factsheets/15018.pdf.
- *Carex collinsi* (Collin's sedge)–habitat is sphagnum moss in acidic swamps and wet woods, often where conifers are a prominent part of the canopy–locally documented in a red maple-hemlock-highbush blueberry sphagnum peat forest of Mud Swamp–locally documented from late June – mid August–for more information, please see http://www.naturalheritage.state.pa.us/factsheets/15018.pdf.
- *Eurybia radula* (rough-leaved aster)–habitat is wet woods, swamps, seeps, bogs, and along streams–locally documented along a pipeline right-of-way with well drained and poorly drained sections as well as sandy

soil–flowers in July-September-for more information, please see http://www.naturalheritage.state.pa.us/factsheets/13027.pdf.

- *Gaultheria hispidula* (creeping snowberry)–habitat is sphagnum dominated areas on decaying logs, stumps, moss hummocks in bogs, peaty wetlands, and swamps–locally documented in a moist palustrine hemlock forest in a sphagnum hummock substrate–flowers in June, fruits in September, but evergreen foliage is identifiable all times of the year without significant snow cover–for more information, please see http://www.naturalheritage.state.pa.us/factsheets/13724.pdf.

- *Myrica gale* (sweet gale)–habitat is boggy wetlands and along shorelines of lakes and streams–locally documented on a narrow fringe of bog mat in a small acidic glacial lake–flowers in May before leaves emerge but can be identified throughout the growing season–for more information, please see http://www.naturalheritage.state.pa.us/factsheets/14167.pdf.
- *Carex paupercula* (bog sedge)–habitat is bogs and peaty wetlands–locally documented within boggy wetlands along Fourth Run in a forest matrix–flowers in May-July, fruits in June-August– for more information, please see http://www.naturalheritage.state.pa.us/factsheets/15160.pdf.
- *Dicentra eximina* (wild bleeding-hearts)–habitat is rich woods and cliffs–locally documented in open woods on fairly level land 2 miles of Forest Inn in Beltsville State Park-has not been seen since 1967 but suitable habitat still exists-flowers in June-July–
- *Potamogeton pulcher* (spotted pondweed)–habitat is shallow, acidic streams, vernal ponds, in swamps, and on muddy shores–locally documented in a vernal pond-flowers from June – September, Fruits from August–October–for more information, please see http://www.naturalheritage.state.pa.us/factsheets/15786.pdf.

- A survey for the above species should be conducted by a qualified botanist *at the appropriate time of year and then submitted to our office for review*. **Your botanist should carefully review the new DCNR Botanical Survey Protocols available at http://www.gis.dcnr.state.pa.us/hgis-er/Login.aspx. These protocols are recommended to ensure that the all necessary information is collected and that survey reports are prepared properly. It is the expectation of DCNR that these protocols will be followed when conducting surveys for species under our jurisdiction.**
- Your botanist should *fill out the field survey form while performing their survey*: http://www.gis.dcnr.state.pa.us/hgis-er/hgis/Internet%20Field%20Survey%20Form_2007.pdf. Contact our office prior to the survey for detailed information about the species, or for a list of qualified surveyors.
- Any target and non-target state-listed species found during the site visit should be reported to our office. Mitigation measures and monitoring may be requested if species or communities of special concern are found on or adjacent to site.
- If more information becomes available and/or a habitat assessment is conducted, and potential suitable habitat for the above species is not present in the project site or will not be impacted, then contact me at c-frsechle@pa.gov or 717-705-2819 and I can reissue a no impact letter.
- If the land type(s) does not exist onsite a survey may not be necessary; please submit a habitat assessment report which describes the current land cover, habitat types and species found onsite.
- If vegetation disturbance will not occur as the result of the proposed forest stewardship plan within the next two years of this letter, please contact me at the above email address or phone number and I can reissue a no impact letter.

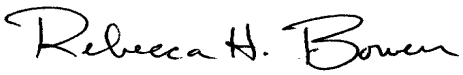
IMPORTANT: To assist with your botanical survey efforts, we are providing ArcMAP shapefiles of GIS Areas of Concern (AOCs). These polygons are based on known locations or potential habitat of DCNR-regulated species or natural communities. Required surveys may be restricted to these AOCs. The survey may be further refined to suitable habitat within areas of anticipated disturbance. For example, if work is restricted to an existing open right-of-way, a survey for a forest-dwelling species would be unnecessary.

PROJECTS ON STATE FOREST LANDS:
A portion of this project takes place on the Weiser State Forest (District 18). The DCNR Bureau of Forestry's *State Forest Resource Management Plan* sets forth guidelines for ecologically-sound management of State Forest Lands and resources including protection of wetlands, wildlife, native wild plants and invasive species management. As such, the DCNR Bureau of Forestry may request additional surveys in association with this project. **This letter applies to PNDI impacts only and does not authorize the initiation of any work on State Forest Lands. Further coordination with the Bureau of Forestry is required.** If you have not already done so, please contact Tim Ladner, District Forester for Weiser State Forest, at 570-875-6450 for additional information.

This response represents the most up-to-date review of the PNDI data files and is valid for two (2) years only. If project plans change or more information on listed or proposed species becomes available, our determination may be reconsidered. Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an "Update" (including an updated PNDI receipt, project narrative and accurate map). As a reminder, this finding applies to potential impacts under DCNR's jurisdiction only. Visit the PNHP website for directions on contacting the Commonwealth's other resource agencies for environmental review.

Should you have any questions or concerns, please contact Frederick Sechler, Jr., Ecological Information Specialist, by phone (717-705-2819) or via email (c-frsechle@pa.gov).

Sincerely,



Rebecca H. Bowen, Section Chief
Pennsylvania Natural Heritage Program
Bureau of Forestry, Ecological Services Section

regarded as the center of the species range. Therefore, it is of paramount importance that PennEast Pipeline avoids impacts to this population as feasibly possible.

4—***Eurybia radula (rough-leaved aster)***–This Pennsylvania proposed Threatened plant species was found in a ROW on relatively high ground between wet ruts. If the existing ROW is disturbed, then this population is vulnerable and would probably be lost. Shifting the pipeline to the west could save the *E. radula* population, but would also sacrifice a portion of the *C. polymorpha* population. DCNR recommends assessing the potential loss of the *C. polymorpha* population if the pipeline is shifted west to save the *E. radula* population. If the *C. polymorpha* population is not negatively affected overall, then DCNR recommends shifting the new pipeline to the west to protect *E. radula* from direct impacts. If this mitigation measure is implemented, then DCNR also recommends collecting seeds from the impacted *E. radula* individuals that would be lost due to shifting the pipeline to the west, and re-planting these plants to suitable habitat.

DCNR also recommends that the above mentioned ecologically sensitive areas are flagged along the right–of-way to alert PPL personnel. Based on this information and if above recommendations are implemented upon satisfaction, DCNR has determined that no impact is likely. No further coordination with our agency will be needed for this project.

DCNR recommends the following steps to help prevent the spread of invasive plant species and to encourage the use of native plants:

- If possible, please clean all construction equipment and vehicles thoroughly (especially the undercarriage and wheels) before they are brought on site, this will remove invasive plant seeds from the equipment and undercarriages of the vehicles that may have been picked up at other sites.
- Avoid using seed mixes that include invasive plant species if the project requires re-vegetating the area. Please also attempt to use weed-free straw or hay mixes when possible. A complete list of all Pennsylvania invasive plant species can be found here: http://www.dcnr.state.pa.us/forestry/wildplant/invasivelist.aspx.
- The area of disturbance should be minimized to the fullest extent that would allow for the PPL project; this will help to lessen the area of indirect disturbance to adjacent wetland and forested areas.

This response represents the most up-to-date review of the PNDI data files and is valid for two (2) years only. If project plans change or more information on listed or proposed species becomes available, our determination may be reconsidered. Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an "Update" (including an updated PNDI receipt, project narrative and accurate map). As a reminder, this finding applies to potential impacts under DCNR's jurisdiction only. Visit the PNHP website for directions on contacting the Commonwealth's other resource agencies for environmental review.

Should you have any questions or concerns, please contact Frederick Sechler, Jr., Ecological Information Specialist, by phone (717-705-2819) or via email (c-frsechle@pa.gov).

Sincerely,



Greg Podniesinski, Section Chief
Natural Heritage Section, DCNR Bureau of Forestry

pennsylvania
DEPARTMENT OF CONSERVATION
AND NATURAL RESOURCES

April 8, 2015

PennEast Pipeline Company, LLC (PennEast)
c/o URS Corporation
625 West Ridge Pike, Suite 100
Conshohoken, PA 19428

ATTN: Jon West

Re: PennEast Pipeline Project
Certificate to Survey

Dear Mr. West:

Thank you and your staff for attending the Pre-Survey Meeting for the *PennEast Pipeline Project* on March 18, 2015. PennEast has demonstrated acceptable project planning and has satisfactorily justified project need and expressed a willingness to consider alternatives and minimize disturbances to reduce project footprint on both State Parks and State Forest lands and sufficiently adhered to established siting guidelines and criteria.

As such, PennEast is hereby provided this *Certificate to Survey* and is authorized to conduct the necessary civil, environmental, cultural resource and geotechnical surveys associated with the proposed project on the Department of Conservation and Natural Resources (DCNR) State Forest and State Park lands.

As PennEast conducts the necessary surveys, DCNR encourages PennEast to explore all alternatives that avoid State Parks. If surveys determine that avoidance is not possible, PennEast is encouraged to consider all options that minimize the impacts to these highly utilized recreational resources and ecologically sensitive areas, including Horizontal Directional Drill (HDD). Specific areas of consideration include:

- Hickory Run State Park: The proposed pipeline will cross Mud Run, Boulder Field and Mud Swamp Natural Areas. The Bureau of State Parks encourages PennEast to evaluate all available routes to avoid impact to Natural Areas.
    - Pa. Code Chapter 17. State Parks Natural Areas- Statement of Policy
      17.3 General management guideline- The protection of Natural Areas will be guided by the need to maintain their significant ecologic values. Generally, physical and biological processes will not be subject to direct human intervention. Activities which interfere with these processes or threaten to degrade the inherent values of these areas will be

prohibited. Management of surrounding lands may not adversely impact these areas. 17.4 (e) Mineral leases and development will be prohibited.

- Beltzville State Park: The proposed pipeline would cross Beltzville at Christman Trail, Cove Ridge Trail, Falls Trail, the Waterfall Area and Wild Creek Cove. This area is the most highly used recreational area of the park that provides a natural setting with unusual scenic beauty. The mission Bureau of State Parks is to promote healthful outdoor recreation and education and to provide facilities necessary for such purposes, while attempting to conceal the hand of man. The Bureau encourages PennEast to survey the existing right-of-ways through Beltzville.

DCNR grants PennEast permission to conduct surveys for all plant and wildlife species of concern identified in PNDI coordination with DCNR, PA Game Commission, PA Fish & Boat Commission and U.S. Fish & Wildlife Survey. Also for the DCNR administered lands, PennEast also agrees to adhere to the following special survey requirements for the following species of concern:

- Wetland Delineation - PennEast has requested and been granted permission for a 400-foot study corridor. Wetland delineations are typically required for the limits of disturbance by the jurisdictional authority. In order to be protective of the established buffers, DCNR requests additional delineations extending 200-feet beyond the limit of disturbance given the presence of either hydric soils or soils with hydric components (NRCS Soil Survey) or National Wetland Inventory (NWI) classified wetlands (USFWS).

- Weiser State Forest: In addition to screw-stem (*Bartonia paniculata*), rough-leaved aster (*Eurybia radula*), and variable sedge (*Carex polymorpha*) which were target species for PNDI surveys in Weiser State Forest (known onsite of the proposed ROW), DCNR requests a survey for Appalachian climbing fern (*Lygodium palmatum*), a local species of conservation interest (but was not listed as a target for a PNDI species survey). Appalachian climbing fern is a species which is uncommon on Weiser State Forest and the forest district desires to protect its population. Appalachian climbing fern is found in moist thickets, barrens, and edges of swampy, open woods in acidic, peaty soil (FACW).
- Beltzville State Park: In addition to surveys for wild bleeding hearts (*Dicentra eximia*) requested by DCNR through the PNDI process, there is also a historic occurrence of matted spike rush (*Eleocharis intermedia*), a wetland species. As a historic occurrence, it was not a target for a PNDI species survey, however, if this species is identified during wetland delineations or other surveys, please report this information to DCNR as well.
- Hickory Run State Park: Targeted survey areas of concern were provided through the PNDI process for creeping snowberry (*Gaultheria hispidula*, found in wet woods and bogs), screw-stem (*Bartonia paniculata*, an obligate aquatic species found in bogs, known onsite of proposed ROW), variable sedge (*Carex polymorpha*, a more upland species), white-fringed orchid (*Platanthera blephariglottis*, known onsite of proposed ROW), and Collin's sedge (*Carex collinsii*). If these species are observed in potential habitat during wetland delineations or other surveys, in areas outside of the targeted areas of concern, please report this information to DCNR. Several of these species are known within the proposed ROW.
- Frances Slocum State Park: No specific survey is requested for soft-leaved sedge (*Carex disperma*); however it is a bog species nearby within the park. It is unlikely that potential habitat is present within the ROW in the park, however please be aware that nearby is a species which utilizes sensitive bog habitat.

- Delaware Canal State Park: The Delaware Canal, established as the Delaware & Lehigh National Heritage Corridor, is a Registered National Historic Landmark and its towpath is a National Recreational Trail. PennEast should provide all historical and archeological reviews to DCNR.
- Bat species: In addition to federally-listed bat species, all state-listed bat species captured on all DCNR lands during mist net and acoustic surveys should be radio tracked to locate roosts. This includes federally-endangered Indiana bat and the newly listed federally-threatened northern long-eared bat, as well as state listed silver-haired bat (candidate-rare), evening bat (candidate-rare) and the eastern small-footed bat (PA-threatened). At least one emergence count should be conducted at identified roosts. Data should be collected in accordance with USFWS and PGC guidelines and submitted to DCNR as well.

The facts and data collected through such surveys will be used, in part, to influence on-the-ground decision making and will serve as the basis for PennEast's completion of the *State Forest Environmental Review* (SFER); a copy of the SFER is attached.

When submitting responses to the SFER to DCNR, PennEast is reminded to also submit copies of PNDI clearance letters, permits obtained to-date and survey reports. The submittal of this data is request as one package; piecemeal data submission is discouraged.

Please avoid conducting surveys during the *Saturdays of Spring Gobbler Hunting Season*, the *traditional rifle Bear Hunting Season* and from *Thanksgiving Day thru the first two week days and the two Saturdays of the traditional deer rifle hunting seasons,* or other special events as identified by the District Forester or Park Manager(s).

[Reference: http://www.portal.state.pa.us/portal/server.pt?open=514&objID=968783&mode=2]

Survey activity on state forest lands and state park lands must be coordinated with the applicable District Forester or State Park Managers; a five (5) day advance notice prior to survey commencement is requested.

Weiser State Forest
Tim Ladner, District Forester
Weiser State Forest District
P.O. Box 315
Aristes, PA 17920
Phone: 570-875-6450

Bureau of State Park Managers
Mr. Brian Taylor, Park Manager
Frances Slocum State Park
565 Mount Olivet Rd.
Wyoming, PA 18644
Phone: 570-696-3525

Mr. Dave Madl, Park Manager
Hickory Run State Park
RR 1 Box 81
White Haven, PA 18661
Phone: 570-443-0400

Mr. Devin Buzard, Park Manager
Beltzville State Park
2950 Pohopoco Dr.
Leighton, PA 18235
Phone: 610-377-0045

Mr. Rick Dalton, Park Manager
Delaware Canal State Park
11 Lodi Hill Road
Upper Black Eddy, PA 18972
Phone: 610-982-5560

The DCNR will continue its due diligence regarding the project to assure consistency with state forest and state park management and the resources, uses and values associated with these lands as the project progresses through the formal DCNR Application for Right of Way Review Process.

Sincerely,

John Hallas
Assistant Bureau Director, Bureau of State Parks

Matthew Beaver
Chief, Division of Operations and Recreation, Bureau of Forestry

Cc: File
Weiser State Forest District
Hickory Run State Park
Delaware Canal State Park
Beltzville State Park
Frances Slocum State Park
Park Region 4
Park Region 5
BSP, RMPD
BSP, POMD
BOF, Division of Operations and Recreation

October 7, 2015

Ms. Rebecca H. Bowen
PA Department of Conservation and Natural Resources
Bureau of Forestry, Ecological Services Section
400 Market St, 6th Floor
PO Box 8552
Harrisburg, PA 17105-8552

RE: PennEast Pipeline Project
Privileged and Confidential
(PNDI) Environmental Large Project # 022426
Rare Plant Survey results

Dear Ms. Bowen:

On behalf of PennEast Pipeline Company, LLC (PennEast), we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project (Project). PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

In accordance with coordination with your office, PennEast contracted with qualified botanist Janet Ebert to conduct surveys for the rare plant species identified by Pennsylvania Department of Conservation and Natural Resources (DCNR). These surveys were conducted in those locations identified by your office, most recently in correspondence dated April 6, 2015. Janet Ebert conducted the required surveys in accordance with state-specified guidelines. The Botanical Survey Report and associated Data Forms documenting the results of these surveys are enclosed for your review. Several protected species were identified during the botanical surveys, and a table that summarizes the locations of these species and proposed mitigation measures is provided below.. In addition to the mitigation measures suggested in the table below, these habitat areas the topsoil containing seeds, roots and rhizomes will be carefully segregated from subsoils and restored to the same topography following construction. No herbicides will be used during the operation and maintenance of the pipeline right-of-way (ROW). There are no above ground facilities proposed in these areas.

Common Name	Scientific Name	Milepost(s)	State Status	Impact Minimization Recommendation
Variable sedge	*Carex polymorpha*	• [redacted] • [redacted] • [redacted] • [redacted] • [redacted]	PA Endangered	The population is dispersed and cannot be avoided completely. Seed collection and replanting may be feasible.
Northern panic grass	*Dichanthelium boreale*	• [redacted] • [redacted]	Tentatively Undetermined	This species can come back after a disturbance if native seed is used for restoration.

URS Corporation 625 West Ridge Pike, Suite E-100 ; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956 ; Fax: 610-832-3501 bernard.holcomb@urs.com

Common Name	Scientific Name	Milepost(s)	State Status	Impact Minimization Recommendation
Rough-leaved aster	*Eurybia radula*	• [redacted]	PA Endangered	A sensitive species that will likely be lost if ROW is disturbed. Seed collection and replanting may be feasible, if pipeline shift cannot be made.
Thread rush	*Juncus filiformis*	• [redacted]	PA Rare	If impacts to existing wetland are limited this plant will not be adversely affected. Additional disturbance may actually create new habitat.
Appalachian climbing fern	*Lygodium palmatum*	• [redacted]	PA Rare	Mitigation to be developed with DCNR during permitting. Avoidance and/or transplantation may be options.
White-fringed orchid	*Platanthera blephariglottis*	• [redacted] • [redacted] • [redacted] • [redacted]	PA Endangered	Habitat for plants is dependent upon existing hydrologic patterns on existing ROW.
Torrey's bulrush	*Schoenoplectus torreyi*	• [redacted]	PA Endangered	Mitigation to be developed with DCNR during permitting. Seed collection may be feasible.

Please advise if the mitigation suggestions PennEast proposes are acceptable to DCNR. We look forward to our continuing consultation with you on this important Project. Please contact Deb Poppel or me if you have any questions.

Sincerely,

Bernie Holcomb
Pipeline Environmental Services Manager

cc: Dave Mong, DCNR

URS Corporation 625 West Ridge Pike, Suite E-100 ; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956 ; Fax: 610-832-3501 bernard.holcomb@urs.com

October 22, 2015 **PNDI Large Project Number: 022426**

Bernie Holcomb
URS Corporation
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428
Email: Bernard.holcomb@urs.com (hard copy not to follow)

Re: PennEast Pipeline Reroute (update)
Multiple Municipalities, Luzerne, Carbon, Northampton and Bucks Counties

Dear Mr. Holcomb,

Thank you for the submission of the Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review Large Project # **022426** for review. PA Department of Conservation and Natural Resources screened this project for potential impacts to species and resources of concern under DCNR's responsibility, which includes plants, terrestrial invertebrates, natural communities, and geologic features only.

No Impact Anticipated per avoidance, minimization of impacts, mitigation measures

PNDI records indicate species or resources under DCNR's jurisdiction are located in the vicinity of the project. A botanical survey was requested by DCNR for ten PA Threatened and Endangered plant species and PA plant species of concern on April 6, 2015. Janet Ebert and Jack Holt conducted botanical surveys in June/July of 2015 for the ten plant species within the seven polygons delineated by DCNR. Five PA T & E and PA plant species of concern, *Juncus filiformis* (thread rush), *Platanthera blephariglottis* (white-fringed orchid), *Carex polymorpha* (variable sedge), *Eurybia radula* (rough-leaved aster), *Dicanthelium boreale* (panic-grass), were found within the seven delineated polygons. A sixth PA plant species of concern, *Lygodium palmatum* (Hartford fern), was found within 2 polygons, but this species status has been downgraded to SP (special population protected).

Below is a summary of DCNR's recommendations (by species) for avoidance and/or mitigation measures for this project:

1—***Juncus filiformis* (thread rush)**–This Pennsylvania Rare plant species of concern was found in a large open bog with patches of wet scrub-shrub thickets. Due to the ecological significance of this large open bog and its sensitivity to disturbance, it is strongly recommended that PennEast Pipeline avoid significant impacts to this wetland. If minimal disturbances will not impact the population of *J. filiformis*, then DCNR will determine that no impact is likely to *J. filiformis*.

2—***Platanthera blephariglottis (white-fringed orchid)***–This Pennsylvania proposed Endangered plant species was found within the right-of-way. The existing hydrological conditions of this part of the ROW should be avoided of impacts, as the habitat is dependent on a hydrological configuration that probably would not be recreated by a new disturbance. DCNR recommends shifting the proposed pipeline on the west side of the road, which may lessen impacts to the *P. blephariglottis* population and the hydrologically sensitive habitat. However, if shifting is not an option, then mitigation would be strongly recommended. However, mitigation by transplanting of *P. blephariglottis* individuals is not recommended, as success rates are probably extremely low.

3—***Carex polymorpha* (variable sedge)**–This Pennsylvania Endangered plant species was found to be widespread within "Polygon 6", within, and outside Weiser State Forest, growing in moist edges of the ROW, in oak-maple woods with various ferns and ericaceous shrubs, usually in ground "openings where ferns-woody vegetation is not too dense. The population of *C. polymorpha* can't be entirely avoided with this project, but the population is large enough that it will probably be able to stay viable and potentially repopulate a new disturbance if there is suitable habitat. DCNR recommends assessing the potentially impacted population and compare the impacted numbers to the individuals of the population that will not be impacted. This assessment will determine if the impacts from the project will potentially negatively affect this *C. polymorpha* population. If the population is large enough to sustain itself despite the impacts, DCNR will determine that no impact is likely if the population is avoided of impacts as much as feasibly possible. It should be mentioned that *C. polymorpha* is globally ranked as G3 (vulnerable). And Pennsylvania contains a large percentage of the global population of this species, and Pennsylvania

regarded as the center of the species range. Therefore, it is of paramount importance that PennEast Pipeline avoids impacts to this population as feasibly possible.

4—***Eurybia radula (rough-leaved aster)***–This Pennsylvania proposed Threatened plant species was found in a ROW on relatively high ground between wet ruts. If the existing ROW is disturbed, then this population is vulnerable and would probably be lost. Shifting the pipeline to the west could save the *E. radula* population, but would also sacrifice a portion of the *C. polymorpha* population. DCNR recommends assessing the potential loss of the *C. polymorpha* population if the pipeline is shifted west to save the *E. radula* population. If the *C. polymorpha* population is not negatively affected overall, then DCNR recommends shifting the new pipeline to the west to protect *E. radula* from direct impacts. If this mitigation measure is implemented, then DCNR also recommends collecting seeds from the impacted *E. radula* individuals that would be lost due to shifting the pipeline to the west, and re-planting these plants to suitable habitat.

DCNR also recommends that the above mentioned ecologically sensitive areas are flagged along the right–of-way to alert PPL personnel. Based on this information and if above recommendations are implemented upon satisfaction, DCNR has determined that no impact is likely. No further coordination with our agency will be needed for this project.

DCNR recommends the following steps to help prevent the spread of invasive plant species and to encourage the use of native plants:

- If possible, please clean all construction equipment and vehicles thoroughly (especially the undercarriage and wheels) before they are brought on site, this will remove invasive plant seeds from the equipment and undercarriages of the vehicles that may have been picked up at other sites.
- Avoid using seed mixes that include invasive plant species if the project requires re-vegetating the area. Please also attempt to use weed-free straw or hay mixes when possible. A complete list of all Pennsylvania invasive plant species can be found here: http://www.dcnr.state.pa.us/forestry/wildplant/invasivelist.aspx.
- The area of disturbance should be minimized to the fullest extent that would allow for the PPL project; this will help to lessen the area of indirect disturbance to adjacent wetland and forested areas.

This response represents the most up-to-date review of the PNDI data files and is valid for two (2) years only. If project plans change or more information on listed or proposed species becomes available, our determination may be reconsidered. Should the proposed work continue beyond the period covered by this letter, please resubmit the project to this agency as an "Update" (including an updated PNDI receipt, project narrative and accurate map). As a reminder, this finding applies to potential impacts under DCNR's jurisdiction only. Visit the PNHP website for directions on contacting the Commonwealth's other resource agencies for environmental review.

Should you have any questions or concerns, please contact Frederick Sechler, Jr., Ecological Information Specialist, by phone (717-705-2819) or via email (c-frsechle@pa.gov).

Sincerely,



Greg Podniesinski, Section Chief
Natural Heritage Section, DCNR Bureau of Forestry

Poppel, Deborah

From: Poppel, Deborah
Sent: Thursday, December 17, 2015 11:27 AM
To: 'damong@pa.gov'
Subject: PennEast update notice
Attachments: PennEast_ProposedRoute_20151214.kmz; PENNEAST_SHAPEFILES_ToDistribute.piz

On behalf of PennEast Pipeline Company (PennEast), thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company; PSEG Power; SJI Midstream; Spectra Energy Partners; and UGI Energy Services.

As an interstate natural gas pipeline, PennEast Pipeline will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. PennEast filed Certificates of Public Convenience and Necessity and Related Authorizations with FERC on September 24, 2015. Since the September 24 filing, PennEast has evaluated several additional route alternatives based on discussions with landowners, regulatory agencies and other stakeholders, as well as comments filed in this proceeding. In light of those evaluations, PennEast has adopted five minor deviations from the route proposed in the September 24 Filing:

Deviation No. 1005 is located between mileposts ("MP") 9.07 and 12.10 in Luzerne County, Pennsylvania. PennEast adopted this deviation to address landowner concerns and to improve constructability of the proposed Project route. The landowner and quarry operators affected by this portion of the proposed Project route indicated that the proposed route in the September 24 Filing has the potential to adversely affect quarry operations. Additionally, this portion of the route in the September 24 Filing route presented a challenging crossing of Mill Creek. Deviation No. 1005 addresses both of these concerns. In addition, this deviation reduces the overall length of the Project and increases the route's co-location with existing utility easements.

Deviation No. 1400 is located between MP 43.95 and 44.55 in Carbon County, Pennsylvania. This deviation has been adopted based on feedback that PennEast received in collaboration with the Bethlehem Authority, which operates a water supply system in Carbon and Northampton Counties, Pennsylvania. Deviation No. 1400 provides a means of crossing the Bethlehem Authority waterline by a trenchless method and avoids the need to locate temporary workspace near the waterline. This deviation also includes a single HDD crossing of Beltzville Lake, instead of the two crossings that were proposed in the September 24 Filing, which minimizes impacts to the Beltzville State Park.

Deviation No. 1701 is located between MP 79.10 and 81.60 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route and is based on feedback that PennEast received in collaboration with the New Jersey Department of Environmental Protection. Deviation No. 1701 minimizes impacts to the New Jersey Natural Lands Trust's Gravel Hill Preserve by increasing co-location with existing utility easements and impacting fewer parcels within the Gravel Hill Preserve. In addition, this deviation allows the proposed route to be in closer proximity to the proposed NRG REMA, LLC/Elizabethtown Gas delivery meter station, and it also relocates a proposed mainline valve from a residential area to an industrial area.

Deviation No. 1802 is located between MP 84.68 and 86.54 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route to avoid crossing a federally preserved farm. PennEast considered different alternatives to avoid this crossing, and the adopted Deviation No. 1802 minimizes land use impacts and overall land requirements to avoid this crossing.

Deviation No. 1900 is located between MP 91.91 and 93.55 in Hunterdon County, New Jersey. This deviation has been adopted to incorporate a route optimization that avoids crossing the Lockatong Creek three times with an open cut. This deviation now allows the Project route to cross the Lockatong Creek using a trenchless method. Deviation No. 1900 also avoids impacts to both a federally preserved farm and a New Jersey Green Acres Program protected parcel.

An updated Google Earth kmz file and GIS shapefiles for the proposed route are attached to aide in your review and analysis of the Project. (To open the shapefiles, please add a ".zip" extension to the file and then extract the files.) Please let us know if you have any difficulty opening the attached files.

Deborah Poppel, CWB
Senior Ecologist/Project Manager
Impact Assessment & Permitting, Environment
D +1-610-832-3597
M +1-215-833-0566
deborah.poppel@aecom.com

AECOM

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pennsylvania
DEPARTMENT OF CONSERVATION
AND NATURAL RESOURCES

January 14, 2016

PennEast Pipeline Company, LLC (PennEast)
One Meridian Blvd., Suite 2C01
Wyomissing, PA 19610

ATTN: Jeff England, Project Manager

Re: PennEast Pipeline Project – 12/17/2015 emailed data
Beltzville State Park and ***Pinchot State Forest proposed alignment changes***

Dear Mr. England:

This letter is in reference to the correspondence of the PennEast email of December 17, 2015, and acts as follow up to the DCNR emailed response of December 17, 2015.

Luzerne County, PA – Pinchot State Forest
From the December 17, 2015 email, it appears that the proposed crossing of the Pinchot State Forest would return to the same alignment as originally proposed on the June 18, 2015 application for right of way filing to DCNR. That proposal entailed 2,477.90 feet in length (the sum distance total of two spans) by 100 foot width of corridor crossing. Unless the distance, width or location to be crossed is different from the June 18, 2015 original application, there is no need to provide an updated application at this time. At a minimum, include the December 17, 2015 emailed information or explanations within the responses being prepared for *the State Forest Environmental Review* (DCNR SFER).

The DCNR is seeking for PennEast to establish viable long-term access into the portion of the Pinchot State Forest between mile posts 11.6 thru 12.6 as this is recently acquired state forest land. The access desired includes securing public access from the north and southeast to the state forest land parcels and access across the existing railroad grade. Establishing access for DCNR would enhance land administration and public recreational opportunities.

As a reminder, the local contact of the Pinchot State Forest is:

Pinchot State Forest
Nicholas Lylo, District Forester
Pinchot State Forest District Office
1839 Abington Rd., North Abington Twp., PA 18414
Phone: 570-945-7133

Carbon County, PA - Beltzville State Park

In reference to the December 17, 2015 email, it appears that one HDD crossing would be proposed or that core bore samples are being taken for evaluation as a potential viable option; this potential option is being considered along with the original proposed option of two HDD segments through the state park. As a part of PennEast's responses to the DCNR SFER, please be sure to include the intended distance of the one HDD span, staging area locations, entrance and exit pit locations - submission of this data via GIS shape files as included in the SFER mailing packet would be appreciated. Include the December 17, 2015 emailed information or explanations within the responses being prepared for the DCNR SFER.

In reference to the mentioned current core bore sampling at the Beltzville State Park, please be sure that further correspondence is achieved with the local park manager in terms of warranting site restoration as a result of the disturbances associated with the boring activity.

As a reminder, the local contact of the Beltzville State Park is:

Beltzville State Park
Devin Buzzard, Park Manager
2950 Pohopoco Drive
Lehighton, PA 18235-8905
Phone: 610-377-0045

Sincerely,

Matthew Beaver
Chief, Division of Operations and Recreation, Bureau of Forestry

Matthew Azeles
Chief, Division of Conservation Resource Management Planning, Bureau of State Parks

Cc: File
Jon West, AECOM
Nicholas Lylo, District Forester, Pinchot State Forest
John Maza, Assistant District Forester, Pinchot State Forest
Rachel Reese, Chief, Resource Management and Field Services Section, Bureau of State Parks
Devin Buzzard, Park Manger, Beltzville State Park
BOF, Division of Operations and Recreation

Pennsylvania Fish and Boat Commission

August 12, 2014

Mr. Chris Urban
Chief, Natural Diversity Section

PENNSYLVANIA FISH AND BOAT COMMISSION
Division of Environmental Services
450 Robinson Lane
Bellefonte, PA 16823

Re: Large Project PNDI Review
PennEast Pipeline Company, LLC - PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania

Dear Mr. Urban:

The PennEast Pipeline Company, LLC (PennEast), is a partnership with UGI Energy Services (UGIES), AGL Resources, NJR Pipeline Company, and South Jersey Industries. The PennEast Pipeline Project (Project) proposes to construct a new 100-mile, 30-inch pipeline to deliver natural gas from northeast Pennsylvania to other markets in Pennsylvania and New Jersey. This new supply of natural gas will bring lower cost supplies to residents and businesses in Pennsylvania and New Jersey, while enhancing pipeline system flexibility and reliability for the local gas utilities.

PennEast intends to file its certificate application for the PennEast Pipeline Project with the Federal Energy Regulatory Commission (FERC) in mid-2015, and anticipates receiving authorization and starting construction in 2017. Permit applications with other federal, state, and local agencies will be submitted within similar timeframes as the certificate application. The permit proceedings conducted by these agencies will provide additional opportunities for public input and involvement. FERC's determination of public convenience and necessity includes a thorough, comprehensive environmental review of proposed projects, working closely with federal, state, and local agencies and in accordance with the National Environmental Policy Act (NEPA).

On behalf of PennEast, URS Corporation (URS) is requesting a Large Project Pennsylvania Natural Diversity Inventory (PNDI) review update for rare, candidate, threatened, and endangered species under the jurisdiction of the Pennsylvania Fish and Boat Commission for the PennEast Pipeline Project. A critical issues analysis was conducted for multiple routes using readily available secondary source data to select the **Least Environmentally Damaging**

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
Fax: 610.832.3501

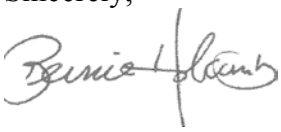
Practicable Alternative (LEDPA) route. Mapping depicting the environmental features evaluated for the preferred alternative is enclosed. We are asking for your review prior to the initiation of wetland and watercourse field surveys to be conducted this fall. We hope to concurrently identify any habitat for species under your agencies' jurisdiction at this time. The environmental study area will be a 400-foot corridor centered on the approximately 100-mile alignment. The anticipated permanent right-of-way (ROW) and temporary construction work area will be approximately 100-feet. The study area is wider than the disturbance area to allow for minor alignment shifts to avoid any sensitive resources that may be identified during the environmental field investigations.

The following are enclosed to facilitate your review:

- Large Project PNDI Form;
- PennEast Project Fact Sheet; and
- CD containing:
    - shapefiles of the alignment;
    - USGS 7.5 minute quadrangle maps with project alignment; and
    - detailed maps depicting the project areas and known secondary source resources

If you have any questions or require additional information regarding this request, please contact me at 610.832.1810 or bernard.holcomb@urs.com.

Sincerely,



Bernard Holcomb
Pipeline Environmental Services Manager
Enclosures (3)

cc: Mr. Anthony Cox (UGI)
Mr. Dante D'Alessandro (UGI)

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
Fax: 610.832.3501

Pennsylvania Natural Diversity Inventory
LARGE PROJECT FORM

How to Use the PNDI Large Project Form

If your Project is a "Large Project"— too large/long to search on the online system
Projects are considered "Large Projects" when the ENTIRE project is:

- Linear/Large Projects that exceed the PNDI online project size limits of 10 miles in length or 5165 acres
- Township-wide, Countywide or Statewide Projects. Examples: Act 537 Sewage Plans, Wind Farms, Roadway Improvements exceeding map limits above.

Due to system limitations and agency requirements, projects should not be submitted piecemeal. The entire project area including roads and infrastructure should be submitted as a single unit.

What to Send to Jurisdictional Agencies

Send the following information to all of the agencies listed on the Large Project Form.

Check-list of Minimum Materials to be submitted:
____Completed Large Project Form
____Supplemental project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.
____USGS 7.5-minute Quadrangle with project boundary clearly indicated, and quad name on the map

The inclusion of the following information may expedite the review process.
____GIS shapefiles depicting the project extent
____A basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)
____Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)
____Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams

PNDI Large Project Form Definitions

***Applicant*:** Person that owns the property or is proposing the project or activity

Contact Person: Person to receive response if different than applicant (e.g. Consultant)

Project Name: Descriptive title of project (e.g. Twin Pines Subdivision, Miller Bridge Replacement)

***Proposed Activity*:** Include ALL earth disturbance activities for project (e.g. for a timber sale—include stream crossings, cutting areas and new roadway accesses). Also include Current Conditions (e.g. housing, farmland, current land cover), and how Construction/Maintenance Activity is to be accomplished

Total Acres of Property: Entire site acreage (e.g. timber sale property—including road access (200 acres)

Acreage to be Impacted: Disturbance acreage (e.g. timber sale—if the property is 200 acres, but only 100 acres will be disturbed, for example: cutting on 90 acres, a road impacting 10 acres); include all temporary and permanent activities

Pennsylvania Natural Diversity Inventory
LARGE PROJECT FORM

This form provides site information necessary to perform an Environmental Review for special concern species and resources listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, the Pennsylvania Fish and Boat Code or the Pennsylvania Game and Wildlife Code.

Applicant Information

Name: Penneast Pipeline Company, LLC
Address: One Meridian Blvd., Suite 2c01 Wyomissing, PA 19610

Phone Number: 844-347-7119 Fax Number:

Contact Person Information - if different from applicant

Name: Bernie Holcomb
Address: 625 W. Ridge Pike, Suite E-100 Conshohocken, Pa 19428
Phone Number: 610-832-1810 Fax Number: 610-832-3501
Email: bernard.holcom

Project Information

Project Name: Penneast Pipeline Project
Project Reference Point (center point of project): Latitude: Longitude: Datum:
Municipality: Multiple County: Luzerne -- Bucks
☒ Attach a copy of a U.S.G.S. 7 ½ Minute Quadrangle Map with Project Boundaries clearly marked.
U.S.G.S. Quad Name: Multiple
Provide GIS shapefiles showing the project boundary (strongly recommended)

Project Description

Proposed Project Activity (including ALL earth disturbance areas and current conditions)

The PennEast Pipeline Project (Project) proposes to construct a new 100-mile, 30-inch pipeline to deliver natural gas from northeast Pennsylvania to other markets in Pennsylvania and New Jersey. This new supply of natural gas will bring lower cost supplies to residents and businesses in Pennsylvania and New Jersey, while enhancing pipeline system flexibility and reliability for the local gas utilities.

Total Acres of Property: 5118 Acreage to be Impacted: 1283

1. Will the entire project occur in or on an existing building, parking lot, driveway, road, maintained road shoulder, street, runway, paved area, railroad bed, or maintained lawn? Yes ☐ No ☒
2. Are there any waterways or waterbodies (intermittent or perennial rivers, streams, creeks, tributaries, lakes or ponds) in or near the project area, or on the land parcel? If so, how many feet away is the project?
   Yes ☒ Within Feet No ☐
3. Are wetlands located in or within 300 feet of the project area? Yes ☒ No ☐ If No, is this the result of a wetland delineation? Tbd
4. How many acres of tree removal, tree cutting or forest clearing will be necessary to implement all aspects of this project? Tbd

Dept. of Conservation and Natural Resources
Bureau of Forestry, Ecological Services Section
400 Market St., PO Box 8552
Harrisburg, PA 17105
fax: 717-772-0271

PA Game Commission
Bureau of Wildlife Habitat Management
Division of Environmental Planning & Habitat Protection
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

PA Fish and Boat Commission
Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823

US Fish and Wildlife Service
Endangered Species Biologist
315 South Allen St., Suite 322
State College, PA 16801
no faxes please

Pennsylvania Fish & Boat Commission
established 1866

Division of Environmental Services
Natural Gas Section
450 Robinson Lane
Bellefonte, PA 16823

September 8, 2014

IN REPLY REFER TO
SIR# 43063

URS CORPORATION
Bernie Holcomb
625 W. Ridge Pike
Conshohocken, Pennsylvania 19428

RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species
PNDI Search No.
PennEast Pipeline Project.
BUCKS County: - CARBON County: - LUZERNE County: - NORTHAMPTON County:

Dear Bernie Holcomb:

This responds to your inquiry about a Pennsylvania Natural Diversity Inventory (PNDI) Internet Database search "potential conflict" or a threatened and endangered species impact review. These projects are screened for potential conflicts with rare, candidate, threatened or endangered species under Pennsylvania Fish & Boat Commission (PFBC) jurisdiction (fish, reptiles, amphibians, aquatic invertebrates only) using the PNDI database and our own files. These species of special concern are listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, and the Pennsylvania Fish & Boat Code (Chapter 75), or the Wildlife Code.

Based on review, the PFBC is concerned the project will have an impact on the following species of special concern:

Timber rattlesnake (*Crotalus horridus*, PA candidate)

Timber rattlesnakes occur in the forested, mountainous regions of the Commonwealth. They prefer forested areas to forage for small mammals (e.g., mice and chipmunks) and southerly-facing slopes for hibernating and other thermoregulatory activities. The timber rattlesnake is threatened by habitat loss/alteration, wanton killing, and poaching.

Given the proximity of the project to known critical timber rattlesnake habitat, we recommend that a timber rattlesnake habitat assessment be conducted in three areas (Table 1) by a qualified timber rattlesnake surveyor. We have included a list of qualified surveyors and habitat assessment protocol for your convenience. This list is not an exhaustive list of qualified rattlesnake surveyors in Pennsylvania as

there may be qualified surveyors who have not asked to be placed on this list. It is not mandatory that you use someone on this list. Upon completion of the habitat survey, the qualified rattlesnake biologist is to submit a report to this office for review and comment. The habitat survey report should include color photographs of the project area (keyed to a site map or diagram) and a description of habitats occurring within the immediate area to be developed (including access roads), as well as the surrounding area. Potential timber rattlesnake critical habitat (denning/gestating areas) should be photographed and mapped accordingly. In addition, the report should also include detailed project plans and maps with a description of the proposed work (including access roads), project impacts and alternatives. Pending the review of this information, a survey targeting the presence of the timber rattlesnake in the project area and/or other project modifications may be requested.

Table 1. Timber Rattlesnake habitat assessment areas.

Area	Mile Post Northern Edge	Mile Post Southern Edge
1	[redacted]	[redacted]
2	[redacted]	[redacted]
3	[redacted]	[redacted]

Northern Cricket Frog (*Acris crepitans*, Endangered)

The Northern cricket frog is a small (less than 2") frog species found in a wide variety of habitats including permanent bodies of water such as slow-moving streams, ponds, lakes, marshes, bogs, and swamps, but also semi-permanent ponds and seasonal forest pools. Breeding occurs from May to August with metamorphosed froglets emerging July to September. The Northern cricket frog occurs in small, isolated populations in eastern Pennsylvania. These small populations are threatened by pollution, and filling/clearing of wetlands and breeding habitat.

If wetlands, vernal pools, open water areas, streams, or ponds or the area within 300ft of these water features are to be disturbed from the project activity, additional evaluations are necessary to confirm whether or not the project site contains habitat and to determine the potential for adverse impacts to this species. Therefore, we request completion of a **habitat assessment** of the project buffer area located in Hickory Run State Park between **Mile Post** [redacted] **and Mile Post** [redacted] to characterize and determine if potential habitat exists within the vicinity of the proposed project area.

A qualified biologist, who possesses the necessary Scientific Collector's Permit issued by the PFBC, must conduct this habitat assessment. A list of biologists recognized as qualified by the PFBC to perform this assessment is enclosed. Items **such as:** basic project plans, project narrative, general habitat descriptions, and color photographs keyed to a site map or diagram of the project area, wetlands identification and delineation, stream characterization (flow velocity, width, depth, substrate type, pools and riffles, identification of basking areas, logs, woody debris, presence of aquatic vegetation) would expedite our review process. Pending the review of information, a survey targeting the presence of the species of concern may be warranted.

If, however, wetlands, vernal pools, or water bodies or the area within 300ft of these water features are not to be disturbed in any way by the proposed activity, and provided that best management practices are employed and strict erosion and sedimentation measures are maintained, I do not foresee any adverse impacts to the Northern Cricket Frog (*Acris crepitans*) from the proposed project.

Freshwater Mussels

Rare or protected freshwater mussel species are known from the vicinity of the North Branch Susquehanna River crossing. Freshwater mussels are the most imperiled taxonomic group in North America. Nearly 20% of the species historically known to occur in the Commonwealth are now extirpated (locally extinct). Additionally 60% of Pennsylvania's remaining species are of conservation concern. We are concerned about direct and indirect (i.e., runoff) effects that the proposed project may have on the species of concern. The freshwater mussel species known from the project area are especially vulnerable to physical (dredging, rip-rap, etc.) and chemical (pH, dissolved oxygen, temperature, heavy metals and organic contaminants) changes to their aquatic environment. Therefore, **we recommend using directional boring** rather than open cutting for the **North Branch Susquehanna River crossing**. Open cutting will most likely adversely impact the species of concern. Work should be conducted from the bank (e.g., no in-stream disturbance). Likewise, no erosion or sediment should be allowed to enter into the river (e.g., strict erosion and sedimentation control measures need to be employed).

Provided that directional boring methodology is used, in-stream work is avoided, strict E&S control measures are maintained, and best management practices are employed, we do not foresee any significant adverse impacts from the proposed activity to the mussel species of special concern or any other rare or protected species under PFBC jurisdiction **provided that the applicant implement the following contingencies to prevent impacts to water quality from drilling/boring operations:**

- Have a designated environmental inspector on site for the duration of the entire crossing operation.
- Stop the bore/drill immediately if anyone on site observes an Inadvertent Return.
- Have a Vac Truck on site or on call (within three hours) to begin clean-up of the release in the stream channel to prevent downstream migration of drilling fluids.

Additionally, any release of sediment to the stream should be reason to initiate contact with the PFBC Bureau of Law Enforcement to address these issues (NE 570-477-5717). Any unauthorized disturbance, unpermitted discharge, or release of sediment(s) that is determined to be a pollution event (generally described http://www.fish.state.pa.us/fishpub/summary/reporting.html) per the Pennsylvania Fish and Boat Code will be subject to the appropriate legal enforcement action.

If, however, the work will necessitate any direct (e.g. equipment intrusion) or indirect impacts (e.g. runoff) to the North Branch Susquehanna River, a mussel survey & relocation should be conducted to avoid potential impacts to these rare mussel species. It is recommended that a qualified malacologist complete a mussel survey to identify any mussel species present and determine their abundance. Additionally, if mussels are encountered it is recommended that the mussels in the area of direct impact be relocated to suitable habitat outside of the disturbance area.

A list of qualified malacologists and a PFBC approved mussel survey protocol is enclosed for your convenience when arranging for a mussel survey. Prior to conducting a survey, qualified malacologist should submit a proposed survey and relocation plan to this office. Upon completion of the mussel survey and relocation, please send a copy of the final report to this office for further evaluation.

Atlantic Sturgeon (*Acipenser oxyrinchus*, Endangered)
Shortnose Sturgeon (*Acipenser brevirostrum*, Endangered)
Eastern Redbelly Turtle (*Pseudemys rubriventris*, Threatened)
Dwarf Wedgemussel (*Alasmidonta heterodon*, PA Endangered, Federal Endangered)

Rare or protected freshwater mussel, fish, and turtle species are known in the vicinity of the Delaware River crossing. The fish species known from the project area are especially vulnerable to physical (dredging, substrate modification, etc.) and chemical (turbidity, pH, dissolved oxygen, temperature, heavy metals and organic contaminants) changes to their aquatic environment. Although the mobile adults of these protected fish species may be capable of moving from the project area, their spawning grounds (including eggs, fry, and immature fish) are vulnerable to burial, crushing by equipment, and siltation from in-stream construction projects. We are concerned about potential impacts to the fish, eggs and the hatching fry from any in-stream work. Therefore, **we recommend using directional boring** rather than open cutting for the **Delaware River crossing**. Open cutting will most likely adversely impact the species of concern. Work should be conducted from the bank (e.g., no in-stream disturbance). Likewise, no erosion or sediment should be allowed to enter into the river (e.g., strict erosion and sedimentation control measures need to be employed).

If, however, the Delaware River work will necessitate any direct impacts such as in-stream work or open cut stream crossings, we will need more information to allow for a more thorough evaluation of potential adverse impacts from the proposed project. Items such as a detailed narrative accurately describing the crossing including possible in-stream work, sequence of activities, basic site plans and map, aerial maps of the general area, project alternatives, acreage to be impacted, general habitat descriptions or onsite color photographs (keyed to a site map) would expedite our review process. Pending the review of this information a survey for the species of concern may be warranted.

Bog Turtle (*Glyptemys muhlenbergii*, PA Endangered, Federal Threatened)

In an effort to streamline our threatened and endangered species environmental review process, reduce the redundancy in project reviews and ease our staff workload, the PFBC has delegated coordination/consultation of joint state/federally listed species impact reviews to the PA Field Office of the U.S. Fish and Wildlife Service (USFWS). Please send your project materials if you have not already done so to them at:

U.S. Fish and Wildlife Service, Endangered Species Section,
315 South Allen St., Suite 322
State College, PA 16801-4851

The PFBC appreciates the detailed information (maps and GIS shapefiles) provided for this review. Please note that the review was based on the 400-ft corridor. Any modification to this corridor could cause the review to change and contact should be initiated to determine the impact(s).

All habitat assessments should include the entire 400-ft corridor between the above referenced Mile Posts to account for minor pipeline realignments. Mile Posts were referenced for habitat assessments since GPS coordinates were not provided. In future correspondence, please provide GPS coordinates with habitat assessments to clarify mile posts and confirm survey locations.

This response represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

If you have any questions regarding this review, please contact Greg Lech at 570-477-3985 and refer to the SIR # 43063. Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,



Heather A. Smiles, Chief
Natural Gas Section

HAS/GPL/dn

PENNSYLVANIA FISH & BOAT COMMISSION
Division of Environmental Services
450 Robinson Lane
Bellefonte, PA 16823-9620

Timber Rattlesnake Habitat Assessment Guidelines

(revised 5/27/2014)

Timber Rattlesnake Natural History

Description

The timber rattlesnake (*Crotalus horridus*) is a large, heavy bodied snake of the pit viper family (Viperidae). Timber rattlesnakes have transverse "V" shaped or chevron-like dark bands on a gray, yellow, black, or brown body color. The tail is completely black with a rattle. The head is large, flat, and triangular, with two thermal-sensitive pits situated between the eyes and the nostrils. The head color of the timber rattlesnake distinguishes two distinct color phases – the dark phase has a completely black head with, generally, black eyes, and the light phase has a yellowish tan to brown head and yellow eyes. The pupils of the eyes are elliptical in shape. The dorsal scales on the timber rattlesnake are strongly keeled, giving it a "rough" appearance. The ventral (underside) of the light phase is yellowish to creamy colored while the dark phase is white with small, dark stipple-like markings. Male and female timber rattlesnakes differ in size and subcaudal scale count. Adult males are usually larger than females (average size of males 42" snout-vent length, compared to 36" for females), and have longer tails (21 or more subcaudal scales between the venter and the rattle).

Life History

Timber rattlesnakes inhabit the forested, mountainous regions of Pennsylvania. Their active season is mid-April through mid-October. They prefer upland forested areas where they forage for small mammals (e.g., mice, and chipmunks). Talus and/or scree slopes, rocky ledges, outcrops, and boulder fields generally with southerly exposures contain the entrances to over-wintering dens. Dens usually have rocky crevices, or other features that provide access to ancestral underground chambers to which the snakes return yearly for hibernation. These sites generally have rocky habitat containing a semi-open canopy close by that is used by gravid females for gestation. Timber rattlesnakes begin emerging (egress) from their dens in mid to late April. Adult males may travel up to 3 to 5 miles away from the den before returning in the fall, unlike non-gravid females, which move approximately 1 to 3 miles from the den, and gravid females, which stay close to the den (100-400m). Timber rattlesnakes begin traveling towards their den sites in September and enter their dens (ingress) for winter dormancy in late September through October.

Rattlesnakes are ambush predators. They identify rodent trails on the forest floor via scent detected with their tongues. They sit and wait for a rodent to pass by on an already established trail before striking them with a venomous bite. After swallowing its prey whole, the timber rattlesnake seeks solar heat exposure to aid digestion of meals by moving to various, usually open, areas to bask.

Females reach reproductive maturity when 7 to 9 years old, as compared to males, which reach reproductive maturity at approximately 5 to 7 years of age. Timber rattlesnakes mate in late summer to early fall (July to mid-September) in Pennsylvania. The young are born live, the following year, in late summer (late August into September) with an average litter size of 5 to 9. Individual females reproduce at intervals of approximately 3 to 5 years. Since the gravid female infrequently feeds during the summer preceding birth of her offspring, the intervening years are necessary for building sufficient body fat to sustain her through gestation and then hibernation. So despite a life-span of up to 30 years, a female may only have 4 to 7 reproductive attempts during her lifetime.

There appears to be high juvenile mortality, since many young timber rattlesnakes fall prey to a variety of natural predators (e.g., birds of prey, carnivorous mammals). Adult timber rattlesnakes have few natural enemies except humans, whose activities have the greatest direct (e.g., road-kill, illegal/wanton killing) and indirect (e.g., habitat loss) impacts to the timber rattlesnake population.

Distribution

The current range of the timber rattlesnake encompasses 31 states from Vermont and New Hampshire south to northern Florida, west to eastern Texas and then north through eastern Oklahoma, Kansas, and Nebraska, through Iowa into

southeastern Minnesota. From southwestern Wisconsin the range retreats south, away from the Great Lakes, through western and southern Illinois and southern Indiana and Ohio.

In Pennsylvania the Allegheny Plateau and the Appalachians are encountered and the range goes north through New York back to southern Vermont and New Hampshire. Prior to European settlement, the range of the timber rattlesnake is thought to have spanned most of Pennsylvania. The current range of the timber rattlesnake is restricted to the more rugged, least accessible, and less populated regions of the Commonwealth. Today, timber rattlesnakes occur in forested, mountainous regions that encompass mainly the central and northeast region of Pennsylvania (e.g., Ridge and Valley Province, Laurel Highlands, Allegheny Plateau, and the Pocono Plateau).

Threats and Conservation

Given the slow maturity, low fecundity, and the many threats posed by the overexploitation of its habitat, the timber rattlesnake is vulnerable to decline. Presently, experts believe that the timber rattlesnake is declining across its range, and in Pennsylvania particularly in the peripheral areas of its range. The decline of the timber rattlesnake is attributed mainly to human activities related to habitat alteration, highways, illegal/wanton killing, and poaching. To date, the timber rattlesnake is protected in over half of the states where it occurs. In Pennsylvania, it is currently listed as a candidate species (an animal that could achieve threatened or endangered status in the future). The timber rattlesnake is legally protected in Pennsylvania and the Pennsylvania Fish and Boat Commission's Natural Diversity Section comments statewide on development projects that have potential to adversely impact timber rattlesnake populations. The Natural Diversity Section is also involved with research projects on monitoring, inventory, and den viability that are being conducted on Pennsylvania timber rattlesnakes.

Impact Review: Development Projects and Potential Conflicts with Timber Rattlesnakes

Many new projects are proposed on lands that are in close proximity to areas that have long been known to harbor timber rattlesnakes. During the environmental review process, the Division of Environmental Services staff may request a timber rattlesnake habitat assessment if: 1) the vicinity of the area that is proposed to be developed is currently or historically known to support timber rattlesnakes and 2) there may be direct impacts to critical habitat for the timber rattlesnake based on the project description. Given the terrain, timber rattlesnakes may be utilizing the project area for denning, reproduction (gestation), basking, and/or foraging. These assessments should be conducted by a PFBC-approved timber rattlesnake surveyor (list enclosed). This list is not an exhaustive list of qualified rattlesnake surveyors in Pennsylvania as there may be qualified surveyors who have not asked to be placed on this list. It is not mandatory that you use someone on this list. Following the assessment, a report documenting the surveyor's findings is submitted to the PFBC for review and comment. This information is pertinent for the staff to provide recommendations for avoiding adverse impacts from the proposed project to the timber rattlesnake population and its habitat. Based on the results of the habitat assessment, a presence/absence survey for the timber rattlesnake may be requested. Not all findings of critical habitat need a follow-up survey to complete the environmental review.

Habitat Assessment Guidelines/Methods

Areas within and at least 300ft around the project area need to be identified that are most likely to support timber rattlesnakes (e.g., talus slopes, scree areas, boulder fields, rocky outcrops, rocky right-of-ways). Although search ranges will vary with project location and size, in general, a search range should include the entire project area (including temporary and permanent impacts) and **a minimum of 300ft from the project boundary**. Results of the habitat assessment, **if needed**, should be recorded on the Timber Rattlesnake Habitat Assessment Form (2-11-10).

PENNSYLVANIA FISH & BOAT COMMISSION
Division of Environmental Services--Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823-9620

Timber Rattlesnake Habitat Assessment Form (revised 02/11/10)

Project Information
Project/Property Name: _____ SIR# _____

Project Type/Description: _____

Project Size* (acreage): _____

Applicant/Landowner Name: _____

County: _____ Quad:_____ Township/Municipality:_____

* Attach a copy of topographic map and a site sketch showing survey site and natural features identified.

Assessment Site Information [Areas within and at least 300 feet around the entire project area need to be assessed.]
Date: _____ Time: _____

Site ID**: _____

Latitude: _____ N Longitude: _____ W

Map Datum Used: _____

Assessment Size** (acreage): _____

** The surveyor should use his/her judgement on the size of the area that a single assessment encompasses. **Additional assessment forms should be used to accurately describe and evaluate large contiguous areas by utilizing a separate form for separate habitat areas within the project boundaries. Each separate area assessed should be assigned a Site ID name that is referenced to the overall site sketch.**

Weather Conditions (Note: Assessment cannot be conducted in snow cover.)
Air temperature (^{o}F) _____ % Cloud Cover _____

Habitat Description
General description: _____

_____

Level of remoteness/nearby disturbance (roads, homes, buildings, utility right-of-ways, etc.):

_____

Topographical description: _____

Slope (Degrees) _____

Aspect _____ (compass orientation, i.e., direction hillside faces)

Ground Cover:

% rocky ground cover: _____

% rocky ground cover that receives direct sunlight: _____

List size range and shape of rocks (round, flat, etc.): _____

_____

Are there rock outcrops or ledges present? _____

Are boulder fields, and/or talus/scree slopes present? _____

Are flat gestation slabs present? _____

Project Name _____ ***Site ID # _____ (con't)***

Vegetative Composition:

% Tree Canopy Cover _____

Dominant species present in and surrounding the described habitat:

Trees: _____

Shrubs: _____

Other plant species of note:_____

Species Observations

Were herpetofauna species or their signs (e.g., sheds, scat, "forms") observed on-site (include timber rattlesnake observations)? If so, what species and how many?

_____

_____

_____

_____

Additional Comments/Observations: (use additional sheets if necessary)

_____

_____

_____

_____

INVESTIGATOR'S OPINION

In your opinion, is there timber rattlesnake critical habitat? Yes☐ or No☐
If Yes, what timber rattlesnake critical habitat occurs in this area? See below.

Hibernaculum/Den Yes☐ or No☐
Gestation/Birthing Yes☐ or No☐

I certify that to the best of my knowledge, all of the information provided herein is accurate and complete.

_____	_____	_____
Investigator's Name (print)	**Investigator's Signature**	**Date**

<u>Reporting, The following items need to be submitted for review:</u>

(1) Timber rattlesnake habitat assessment form.
(2) A project narrative/description, exact project location, equipment to be used in earth moving activities
(3) Color photographs of surveyed area showing: general panorama, rocky areas, and specimens observed.
(4) Site sketch showing the location and direction of photos taken.
(5) Topographic map showing location of area surveyed, the identified potential habitat delineated, the proposed project and associated boundaries.

Please mail these items to: **Natural Diversity Section**
PA Fish & Boat Commission
450 Robinson Lane
Bellefonte, PA 16823

PENNSYLVANIA FISH & BOAT COMMISSION
Division of Environmental Services
Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823-9620

QUALIFIED TIMBER RATTLESNAKE SURVEYORS

The following list includes persons known to the Pennsylvania Fish and Boat Commission (PFBC) to possess skills and have experience in properly searching for and finding timber rattlesnakes (*Crotalus horridus*) and in identifying their critical habitat. This list is not an exhaustive list of qualified surveyors in Pennsylvania as there may be qualified surveyors who have not asked to be placed on the list. Placement on the list is not to be construed as an endorsement of individuals or firms by the PFBC or any of its employees.

Stan Boder
Wildlife Specialists, LLC
2780 Hills Creek Road
Wellsboro PA 16901
Office: 570-376-2255
Cell: 570-952-1169
E-mail: stan@wildlife-specialists.com

Michael Torocco
Herpetological Associates, Inc
581 Airport Road
Bethel PA 19507
Phone: 717-933-8380
Fax: 717-933-4096
E-mail: mtorocco@herpetologicalassociates.com

Glenn Johnson, Ph.D.
Professor, Department of Biology
State University of New York at Potsdam
44 Pierrepont Road
Potsdam NY 13676
Office: (315) 267-2710
Home: (315) 268-1649
E-mail: johnsong@potsdam.edu

W.H. Martin
1227 Engle Molers Rd
Harpers Ferry WV 25425
(304) 876-3219
E-Mail: whmartin@crotalus.org

B. Scott Fiegel, Howard K. Reinert Ph.D.
Ecological Associates
PO Box 181
Oley PA 19547-0181
610-987-6585
Bscottfiegel@aol.com

Kathy Michell
KT Wildlife, LLC
42 School St
Narrowsburg, NY 12764
Home: 845-252-3501
Cell: 845-807-7485
E-mail: kmichell@hvc.rr.com

Howard Reinert, Ph.D.
Professor, Biology Department
The College of New Jersey
P.O Box 7718, 2000 Pennington Road
Ewing NJ 08628-0718
Office: (609) 771-2474
hreinert@tcnj.edu

Gian Rocco, Ph.D.
322 Strawberry Hill Road
Centre Hall, PA 16828
Home: 814-364-1204
Cell: (814) 883-8635
gxr124@psu.edu

Randy Stechert
Timber Rattlesnake Consultant
50 School Street
Narrowsburg NY 12764-6432
Home: (845) 252-3517

Robert Zappalorti
Herpetological Associates, Inc.
575 Toms River Road
Jackson NJ 08527
Office: (732) 833-8600
E-mail: Rzappalort@aol.com

Phillip R. Dunning
Wildlife Specialists, LLC
2785 Hills Creek Rd, Wellsboro, PA 16901
Office: (570) 376-2255
Cell: (215) 815-9571
E-mail: flip3238@aol.com

Chris Camacho
West Branch Limited LLC
416 Short Run Road
Galeton, PA 16922
Office: (814) 435-8274
Cell: (914) 584-1088
E-mail: christopherscamacho@gmail.com

PENNSYLVANIA FISH & BOAT COMMISSION
Division of Environmental Services
Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823-9620

QUALIFIED SURVEYORS FOR NORTHERN CRICKET FROG

58 Pa. Code §75.5 provides that in order to conduct surveys for endangered or threatened fish (fish, amphibians, reptiles and aquatic invertebrates) species or their habitat in connection with an application for a proposed or planned development activity, a surveyor must be deemed qualified by the Pennsylvania Fish and Boat Commission (PFBC). An individual who wishes to be qualified by the PFBC to conduct surveys for endangered or threatened species must demonstrate to the PFBC's satisfaction that he or she meets the qualified surveyor requirements as approved by the Executive Director and published in the *Pennsylvania Bulletin*. The following list includes persons deemed qualified by the PFBC to possess skills and to have experience in properly searching for and finding Northern Cricket Frogs (*Acris crepitans*) and in identifying their critical habitat. Persons not on this list but who have documented experience in conducting scientific studies of, or successful searches for, Northern Cricket Frogs and their critical habitat may submit their qualifications to the Natural Diversity Section for review and possible inclusion as a qualified surveyor. When applicable, a qualified surveyor must meet the requirements pertaining to scientific collector's permits and special permits for endangered and threatened species. All permitted collector's encounters with Northern Cricket Frogs must be reported in writing to the PFBC's Natural Diversity Section.

Michael Torocco
Herpetological Associates, Inc.
581 Airport Road
Bethel, PA 19507
(717)933-8380
MTorocco@herpetologicalassociates.com

PENNSYLVANIA FISH & BOAT COMMISSION
Division of Environmental Services
Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823-9620

QUALIFIED SURVEYORS FOR FRESHWATER MUSSELS in the ATLANTIC SLOPE (DELAWARE, POTOMAC, AND SUSQUEHANNA WATERSHEDS)

58 Pa. Code §75.5 provides that in order to conduct surveys for endangered or threatened fish (fish, amphibians, reptiles and aquatic invertebrates) species or their habitat in connection with an application for a proposed or planned development activity, a surveyor must be deemed qualified by the Pennsylvania Fish and Boat Commission (PFBC). An individual who wishes to be qualified by the PFBC to conduct surveys for endangered or threatened species must demonstrate to the PFBC's satisfaction that he or she meets the qualified surveyor requirements as approved by the Executive Director and published in the *Pennsylvania Bulletin*. The following list includes persons deemed qualified by the PFBC to possess skills and to have experience in properly searching for and finding Threatened or Endangered Freshwater Mussel species and in identifying their critical habitat. Persons not on this list but who have documented experience in conducting scientific studies of, or successful searches for, Threatened or Endangered Freshwater Mussel species and their critical habitat may submit their qualifications to the Natural Diversity Section for review and possible inclusion as a qualified surveyor. When applicable, a qualified surveyor must meet the requirements pertaining to scientific collector's permits and special permits for endangered and threatened species. All permitted collector's encounters with Threatened or Endangered Freshwater Mussel species must be reported in writing to the PFBC's Natural Diversity Section.

Arthur Bogan
North Carolina Museum of Natural Sciences
11 West Jones Street
Raleigh, NC 27601
(919)707-8863
arthur.bogan@ncdenr.gov

Jeffrey Cole
8 Cherry Street
Wellsboro, PA 16901
(607)738-9577
jccole10@gmail.com

Ethan Nedeau
206 Pratt Corner Road
Leverett, MA 01054
(413)253-6561
Nedeau.ethan@gmail.com

Joseph Snavely
URS Corporation
4507 N. Front Street
Harrisburg, PA 17110
(717)635-7916 office (717)816-9956 cell
joseph.snavely@urs.com

Barbara St. John White*
8 Cherry Street
Wellsboro, PA 16901
(814)933-6877
stjohn.white@gmail.com

Greg Zimmerman
EnviroScience, Inc.
5070 Stow Road
Stow, OH 44224
(330)688-0111
gzimmerman@enviroscienceinc.com

*Conditionally approved for 2014.

March 30, 2015

Mr. Greg Lech
Pennsylvania Fish and Boat Commission; Oil and Gas Section
450 Robinson Land
Bellefonte, PA 16823

Dear Mr. Lech:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Spectra Energy Partners; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. Over the past months, PennEast has worked to refine a preferred alternative route and to obtain permissions to survey. To that end, we must inform you that the preferred alternative route has again been adjusted to account for engineering, environmental, and land use constraints that have been identified since we last provided your agency with detailed project mapping on January 14, 2015.

Following feedback from FERC's scoping meetings and numerous conversations with landowners, state and local agencies, and other various stakeholders, PennEast has revised and refined various portions of the preferred alternative route. The largest variations to the previously released route are related to the location of the crossing of the Bethlehem Authority water supply mainline (MP 44 and MP 45), Appalachian Trail crossing (between MP 46 and MP 55), and accommodating future subdivision and housing development plans. Additional field data gained over the last month has helped make smaller adjustments related to environmental surveys and individual discussions with landowners.

In addition to the route variations noted above, an additional interconnect was needed for the Gilbert Power Generation facility in Holland Township, New Jersey, which is fed by a small lateral (12 inches) to supply natural gas to the facility. The previously located interconnection with Elizabethtown Gas was relocated so that both interconnects can be co-located within the power station's industrial property to minimize additional above-ground impacts.

A summary of the significant route variations in Pennsylvania is provided below:

- In Towamensing Township in Carbon County, PA, less than one mile of the alignment has been re-routed ¼-mile to the east as a result of consultations with the Bethlehem Authority (Authority). The alignment has been re-routed between mileposts 44 and 45 to cross the Authority's water supply mainline in a location where it is deeper in an effort to maximize protection of the Authority's resources.

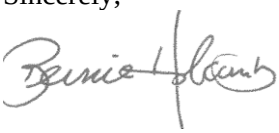
- Straddling the Carbon – Northampton County line in PA, approximately 8 miles of the alignment between mileposts 46 and 55 has been re-routed up to 1 mile to the west of the previous route in an effort to refine the crossing location of the Appalachian Trail.

- In Northampton County, PA, approximately 2.5 miles of the alignment has been re-routed less than ½-mile to the north of the previous route as a result of consultations with private landowners and local officials. The alignment has been re-routed between mileposts 59 and 62 to accommodate current and future land use plans in the area.

Updated GIS shapefiles for the entire new preferred alternative route are being provided to aide in your review and analysis of the project.

We look forward to continuing to work with you and your colleagues on this important project. Please contact me if you have any questions.

Sincerely,



Bernie Holcomb

Pipeline Environmental Services Manager

URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428

Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com

Pennsylvania Fish & Boat Commission
established 1866

Division of Environmental Services
Natural Gas Section
450 Robinson Lane
Bellefonte, PA 16823

April 22, 2015

IN REPLY REFER TO
SIR# 43063

URS CORPORATION
Bernie Holcomb
625 W. Ridge Pike
Conshohocken, Pennsylvania 19428

RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species
PNDI Search No.
PennEast Pipeline Project.
BUCKS County: - CARBON County: - LUZERNE County: - NORTHAMPTON County:

Dear Bernie Holcomb:

This is a response to your updated submission for the PennEast Pipeline Project, received on March 31, 2015. This update was described by you as:

1) In Towamensing Township in Carbon County, PA, less than one mile of the alignment has been re-routed ¼-mile to the east as a result of consultations with the Bethlehem Authority (Authority). The alignment has been re-routed between mileposts 44 and 45 to cross the Authority's water supply mainline in a location where it is deeper in an effort to maximize protection of the Authority's resources.

2) Straddling the Carbon – Northampton County line in PA, approximately 8 miles of the alignment between mileposts 46 and 55 has been re-routed up to 1 mile to the west of the previous route in an effort to refine the crossing location of the Appalachian Trail.

3) In Northampton County, PA, approximately 2.5 miles of the alignment has been re-routed less than ½- mile to the north of the previous route as a result of consultations with private landowners and local officials. The alignment has been re-routed between mileposts 59 and 62 to accommodate current and future land use plans in the area.

Based on the updated pipeline route the Pennsylvania Fish and Boat Commission (PFBC) will **ONLY** modify our previous recommendation related to the **Timber Rattlesnake (*Crotalus horridus*)**. In a letter dated November 10, 2015, Table 2 was provided to summarize areas where habitat assessments were requested. **As a result of the update see Table 3 below**.

Table 3. Timber Rattlesnake habitat assessment areas.[1,2]

Area	Mile Post Northern Edge	Mile Post Southern Edge
1-3	Removed	Removed
4	[redacted]	[redacted]
5	[redacted]	[redacted]
6	[redacted]	[redacted]
7	[redacted]	[redacted]
8	[redacted]	[redacted]
9	[redacted]	[redacted]
10	Removed	Removed
11	[redacted]	[redacted]

[1]Updated for 10/24/2014 Route.
[2]Updated for 3/31/2015 Route.

In addition, the PFBC is still concerned with potential impacts to the following species, as outlined in previous consultation letters:

Northern Cricket Frog (*Acris crepitans*, Endangered)
Freshwater Mussels
Atlantic Sturgeon (*Acipenser oxyrinchus*, Endangered)
Shortnose Sturgeon (*Acipenser brevirostrum*, Endangered)
Eastern Redbelly Turtle (*Pseudemys rubriventris*, Threatened)
Dwarf Wedgemussel (*Alasmidonta heterodon*, PA Endangered, Federal Endangered)

This response represents the most up-to-date summary of the Pennsylvania Natural Diversity Inventory (PNDI) data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

If you have any questions regarding this review, please contact Greg Lech at 570-477-3985 and refer to the SIR # 43063. Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,

Heather Smiles

Heather A. Smiles, Chief
Natural Gas Section

HAS/GPL/dn

Poppel, Deborah

From: Poppel, Deborah
Sent: Thursday, December 17, 2015 11:28 AM
To: 'glech@pa.gov'
Subject: PennEast update notice
Attachments: PennEast_ProposedRoute_20151214.kmz; PENNEAST_SHAPEFILES_ToDistribute.piz

On behalf of PennEast Pipeline Company (PennEast), thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company; PSEG Power; SJI Midstream; Spectra Energy Partners; and UGI Energy Services.

As an interstate natural gas pipeline, PennEast Pipeline will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. PennEast filed Certificates of Public Convenience and Necessity and Related Authorizations with FERC on September 24, 2015. Since the September 24 filing, PennEast has evaluated several additional route alternatives based on discussions with landowners, regulatory agencies and other stakeholders, as well as comments filed in this proceeding. In light of those evaluations, PennEast has adopted five minor deviations from the route proposed in the September 24 Filing:

Deviation No. 1005 is located between mileposts ("MP") 9.07 and 12.10 in Luzerne County, Pennsylvania. PennEast adopted this deviation to address landowner concerns and to improve constructability of the proposed Project route. The landowner and quarry operators affected by this portion of the proposed Project route indicated that the proposed route in the September 24 Filing has the potential to adversely affect quarry operations. Additionally, this portion of the route in the September 24 Filing route presented a challenging crossing of Mill Creek. Deviation No. 1005 addresses both of these concerns. In addition, this deviation reduces the overall length of the Project and increases the route's co-location with existing utility easements.

Deviation No. 1400 is located between MP 43.95 and 44.55 in Carbon County, Pennsylvania. This deviation has been adopted based on feedback that PennEast received in collaboration with the Bethlehem Authority, which operates a water supply system in Carbon and Northampton Counties, Pennsylvania. Deviation No. 1400 provides a means of crossing the Bethlehem Authority waterline by a trenchless method and avoids the need to locate temporary workspace near the waterline. This deviation also includes a single HDD crossing of Beltzville Lake, instead of the two crossings that were proposed in the September 24 Filing, which minimizes impacts to the Beltzville State Park.

Deviation No. 1701 is located between MP 79.10 and 81.60 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route and is based on feedback that PennEast received in collaboration with the New Jersey Department of Environmental Protection. Deviation No. 1701 minimizes impacts to the New Jersey Natural Lands Trust's Gravel Hill Preserve by increasing co-location with existing utility easements and impacting fewer parcels within the Gravel Hill Preserve. In addition, this deviation allows the proposed route to be in closer proximity to the proposed NRG REMA, LLC/Elizabethtown Gas delivery meter station, and it also relocates a proposed mainline valve from a residential area to an industrial area.

Deviation No. 1802 is located between MP 84.68 and 86.54 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route to avoid crossing a federally preserved farm. PennEast considered different alternatives to avoid this crossing, and the adopted Deviation No. 1802 minimizes land use impacts and overall land requirements to avoid this crossing.

Deviation No. 1900 is located between MP 91.91 and 93.55 in Hunterdon County, New Jersey. This deviation has been adopted to incorporate a route optimization that avoids crossing the Lockatong Creek three times with an open cut. This deviation now allows the Project route to cross the Lockatong Creek using a trenchless method. Deviation No. 1900 also avoids impacts to both a federally preserved farm and a New Jersey Green Acres Program protected parcel.

An updated Google Earth kmz file and GIS shapefiles for the proposed route are attached to aide in your review and analysis of the Project. (To open the shapefiles, please add a ".zip" extension to the file and then extract the files.) Please let us know if you have any difficulty opening the attached files.

Deborah Poppel, CWB
Senior Ecologist/Project Manager
Impact Assessment & Permitting, Environment
D +1-610-832-3597
M +1-215-833-0566
deborah.poppel@aecom.com

AECOM

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Pennsylvania Fish & Boat Commission
established 1866

Division of Environmental Services
Natural Gas Section
450 Robinson Lane
Bellefonte, PA 16823

January 5, 2016

IN REPLY REFER TO
SIR# 44756

AECOM
Bernie Holcomb
625 W. Ridge Pike
Suite E-100
CONSHOHOCKEN, Pennsylvania 19428

RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species
PNDI Search No.
PennEast Pipeline Project
Deviation No. 1005 and No. 1400
LUZERNE County: - CARBON County:

Dear Bernie Holcomb:

This responds to your recent correspondence related to the PennEast pipeline project (Project) in regards to a Pennsylvania Natural Diversity Inventory (PNDI) threatened and endangered species impact review.

On December 17, 2015, an updated route was submitted, by e-mail, which outlined minor deviations to the proposed Project corridor. A review of this updated route revealed minor modifications to previous recommendations related to Timber Rattlesnake was warranted. However the review revealed no new impacts to species of special concern under Pennsylvania Fish and Boat Commission (PFBC) jurisdiction.

You discuss two deviations within Pennsylvania:

1) Deviation No. 1005 is located between mileposts ("MP") 9.07 and 12.10 in Luzerne County, Pennsylvania.

This deviation affects two areas previously identified for habitat assessments for Timber Rattlesnakes (Area 4 and Area 12). Area 4 was removed due to a July 2015 re-route but will be impacted with the latest re-route. Area 4 was surveyed for potential critical habitat and the results are available in Report 1 (Prepared by Wildlife Specialists, August 2015). Potential critical habitat was found within Area 4. The PFBC recommends Area 4 be added to sites which contain potential critical habitat. Please follow guidance provided in the November 5, 2015 letter: 1) conduct presence/absence surveys, in the spring

2016, within those areas of potential denning habitat that may be impacted by the Project; 2) re-create gestation habitat, following PFBC guidelines, that is impacted by the Project; 3) conduct minor alignment shifts to avoid potential denning habitat. The PFBC recommends a 300-foot buffer be established from the edge of the Project disturbance and the denning habitat that was identified in the habitat assessment. A list of qualified surveyors was previously provided along with Rattlesnake Presence-Absence Survey Guidelines.

Area 12 is no longer proposed for impact. With the removal of Area 12, all survey areas have been assessed for potential critical habitat for the Timber Rattlesnake in the Project area. Presence/Absence surveys conducted in spring 2016 will determine future recommendations.

2) Deviation No. 1400 is located between MP 43.95 and 44.55 in Carbon County, Pennsylvania.

This deviation does not occur near any known species of special concern occurrences under PFBC jurisdiction, therefore no recommendations result from Deviation No. 1400.

This response represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

If you have any questions regarding this review, please contact Greg Lech at 570-477-3985 and refer to the SIR # 44756. Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,

Heather Smiles

Heather A. Smiles, Chief
Natural Gas Section

HAS/GPL/dn

cc: D. Poppel, AECOM

Pennsylvania Game Commission

August 12, 2014

Mr. Daniel Brauning
Chief, Wildlife Diversity Section

PENNSYLVANIA GAME COMMISSION
Division of Environmental Planning and Habitat Protection
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

Re: Large Project PNDI Review
PennEast Pipeline Company, LLC - PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania

Dear Mr. Brauning:

The PennEast Pipeline Company, LLC (PennEast), is a partnership with UGI Energy Services (UGIES), AGL Resources, NJR Pipeline Company, and South Jersey Industries. The PennEast Pipeline Project (Project) proposes to construct a new 100-mile, 30-inch pipeline to deliver natural gas from northeast Pennsylvania to other markets in Pennsylvania and New Jersey. This new supply of natural gas will bring lower cost supplies to residents and businesses in Pennsylvania and New Jersey, while enhancing pipeline system flexibility and reliability for the local gas utilities.

PennEast intends to file its certificate application for the PennEast Pipeline Project with the Federal Energy Regulatory Commission (FERC) in mid-2015, and anticipates receiving authorization and starting construction in 2017. Permit applications with other federal, state, and local agencies will be submitted within similar timeframes as the certificate application. The permit proceedings conducted by these agencies will provide additional opportunities for public input and involvement. FERC's determination of public convenience and necessity includes a thorough, comprehensive environmental review of proposed projects, working closely with federal, state, and local agencies and in accordance with the National Environmental Policy Act (NEPA).

On behalf of PennEast, URS Corporation (URS) is requesting a Large Project Pennsylvania Natural Diversity Inventory (PNDI) review update for rare, candidate, threatened, and endangered species under the jurisdiction of the Pennsylvania Game Commission for the PennEast Pipeline Project. A critical issues analysis was conducted for multiple routes using readily available secondary source data to select the **Least Environmentally Damaging**

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
Fax: 610.832.3501

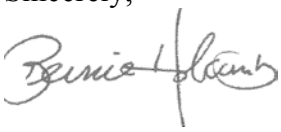
Practicable Alternative (LEDPA) route. Mapping depicting the environmental features evaluated for the preferred alternative is enclosed. We are asking for your review prior to the initiation of wetland and watercourse field surveys to be conducted this fall. We hope to concurrently identify any habitat for species under your agencies' jurisdiction at this time. The environmental study area will be a 400-foot corridor centered on the approximately 100-mile alignment. The anticipated permanent right-of-way (ROW) and temporary construction work area will be approximately 100-feet. The study area is wider than the disturbance area to allow for minor alignment shifts to avoid any sensitive resources that may be identified during the environmental field investigations.

The following are enclosed to facilitate your review:

- Large Project PNDI Form;
- PennEast Project Fact Sheet; and
- CD containing:
    - shapefiles of the alignment;
    - USGS 7.5 minute quadrangle maps with project alignment; and
    - detailed maps depicting the project areas and known secondary source resources

If you have any questions or require additional information regarding this request, please contact me at 610.832.1810 or bernard.holcomb@urs.com.

Sincerely,



Bernard Holcomb
Pipeline Environmental Services Manager
Enclosures (3)

cc: Mr. Anthony Cox (UGI)
Mr. Dante D'Alessandro (UGI)

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
Fax: 610.832.3501

Pennsylvania Natural Diversity Inventory
LARGE PROJECT FORM

How to Use the PNDI Large Project Form

If your Project is a "Large Project"— too large/long to search on the online system
Projects are considered "Large Projects" when the ENTIRE project is:

- Linear/Large Projects that exceed the PNDI online project size limits of 10 miles in length or 5165 acres
- Township-wide, Countywide or Statewide Projects. Examples: Act 537 Sewage Plans, Wind Farms, Roadway Improvements exceeding map limits above.

Due to system limitations and agency requirements, projects should not be submitted piecemeal. The entire project area including roads and infrastructure should be submitted as a single unit.

What to Send to Jurisdictional Agencies

Send the following information to all of the agencies listed on the Large Project Form.

Check-list of Minimum Materials to be submitted:
____Completed Large Project Form
____Supplemental project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.
____USGS 7.5-minute Quadrangle with project boundary clearly indicated, and quad name on the map

The inclusion of the following information may expedite the review process.
____GIS shapefiles depicting the project extent
____A basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)
____Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)
____Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams

PNDI Large Project Form Definitions

***Applicant*:** Person that owns the property or is proposing the project or activity

Contact Person: Person to receive response if different than applicant (e.g. Consultant)

Project Name: Descriptive title of project (e.g. Twin Pines Subdivision, Miller Bridge Replacement)

***Proposed Activity*:** Include ALL earth disturbance activities for project (e.g. for a timber sale—include stream crossings, cutting areas and new roadway accesses). Also include Current Conditions (e.g. housing, farmland, current land cover), and how Construction/Maintenance Activity is to be accomplished

Total Acres of Property: Entire site acreage (e.g. timber sale property—including road access (200 acres)

Acreage to be Impacted: Disturbance acreage (e.g. timber sale—if the property is 200 acres, but only 100 acres will be disturbed, for example: cutting on 90 acres, a road impacting 10 acres); include all temporary and permanent activities

Pennsylvania Natural Diversity Inventory
LARGE PROJECT FORM

This form provides site information necessary to perform an Environmental Review for special concern species and resources listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, the Pennsylvania Fish and Boat Code or the Pennsylvania Game and Wildlife Code.

Applicant Information

Name: Penneast Pipeline Company, LLC
Address: One Meridian Blvd., Suite 2c01 Wyomissing, PA 19610

Phone Number: 844-347-7119 Fax Number:

Contact Person Information - if different from applicant

Name: Bernie Holcomb
Address: 625 W. Ridge Pike, Suite E-100 Conshohocken, Pa 19428
Phone Number: 610-832-1810 Fax Number: 610-832-3501
Email: bernard.holcom

Project Information

Project Name: Penneast Pipeline Project
Project Reference Point (center point of project): Latitude: Longitude: Datum:
Municipality: Multiple County: Luzerne -- Bucks
☒ Attach a copy of a U.S.G.S. 7 ½ Minute Quadrangle Map with Project Boundaries clearly marked.
U.S.G.S. Quad Name: Multiple
Provide GIS shapefiles showing the project boundary (strongly recommended)

Project Description

Proposed Project Activity (including ALL earth disturbance areas and current conditions)

The PennEast Pipeline Project (Project) proposes to construct a new 100-mile, 30-inch pipeline to deliver natural gas from northeast Pennsylvania to other markets in Pennsylvania and New Jersey. This new supply of natural gas will bring lower cost supplies to residents and businesses in Pennsylvania and New Jersey, while enhancing pipeline system flexibility and reliability for the local gas utilities.

Total Acres of Property: 5118 Acreage to be Impacted: 1283

1. Will the entire project occur in or on an existing building, parking lot, driveway, road, maintained road shoulder, street, runway, paved area, railroad bed, or maintained lawn? Yes ☐ No ☒
2. Are there any waterways or waterbodies (intermittent or perennial rivers, streams, creeks, tributaries, lakes or ponds) in or near the project area, or on the land parcel? If so, how many feet away is the project?
   Yes ☒ Within Feet No ☐
3. Are wetlands located in or within 300 feet of the project area? Yes ☒ No ☐ If No, is this the result of a wetland delineation? Tbd
4. How many acres of tree removal, tree cutting or forest clearing will be necessary to implement all aspects of this project? Tbd

Dept. of Conservation and Natural Resources
Bureau of Forestry, Ecological Services Section
400 Market St., PO Box 8552
Harrisburg, PA 17105
fax: 717-772-0271

PA Game Commission
Bureau of Wildlife Habitat Management
Division of Environmental Planning & Habitat Protection
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

PA Fish and Boat Commission
Natural Diversity Section
450 Robinson Lane
Bellefonte, PA 16823

US Fish and Wildlife Service
Endangered Species Biologist
315 South Allen St., Suite 322
State College, PA 16801
no faxes please

Division of Environmental
Planning and Habitat
Protection
717-783-5957

COMMONWEALTH OF PENNSYLVANIA
Pennsylvania Game Commission

2001 ELMERTON AVENUE
HARRISBURG, PA 17110-9797

"To manage all wild birds, mammals and their habitats for current and future generations."

ADMINISTRATIVE BUREAUS:

ADMINISTRATION.....717-787-5670
HUMAN RESOURCES.....717-787-7836
FISCAL MANAGEMENT.....717-787-7314
CONTRACTS AND PROCUREMENT.....717-787-6594
LICENSING.....717-787-2084
OFFICE SERVICES.....717-787-2116
WILDLIFE MANAGEMENT.....717-787-5529
INFORMATION & EDUCATION.....717-787-6286
WILDLIFE PROTECTION.....717-783-6526
WILDLIFE HABITAT MANAGEMENT.....717-787-6818
REAL ESTATE DIVISION.....717-787-6568
AUTOMATED TECHNOLOGY SERVICES.....717-787-4076

www.pgc.state.pa.us

September 24, 2014 **PGC ID Number: 201408190001**

Bernie Holcomb
URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Bernard.Holcomb@urs.com

Re: Penneast Pipeline Company, LLC – Penneast Pipeline Project
State Game Lands Nos. 91, 119, 40, 141, and 168
Large Project PNDI Review
Luzerne, Carbon, Northampton, and Bucks Counties, PA

Dear Mr. Holcomb,

Thank you for submitting your Pennsylvania Natural Diversity Inventory (PNDI) Large Project Environmental Review request. The Pennsylvania Game Commission (PGC) screened this project, including the requested 400-foot buffer (200 feet on each side of proposed centerline), for potential impacts to species and resources of concern under PGC responsibility, which includes birds and mammals only.

Potential Impact Anticipated

PNDI records indicate species or resources of concern are located in the vicinity of the project. The PGC has received and thoroughly reviewed the information that you provided to this office as well as PNDI data, and has determined that potential impacts to threatened, endangered, and species of special concern may be associated with your project. Therefore, additional measures are necessary to avoid potential impacts to the species listed below:

Scientific Name	Common Name	PA Status
Glaucomys sabrinus macrotis	Northern Flying Squirrel	ENDANGERED
Neotoma magister	Allegheny Woodrat	THREATENED
Myotis leibii	Eastern Small-footed Bat	THREATENED
Pandion haliaetus	Osprey	THREATENED
Myotis septentrionalis	Northern Long-eared Bat	SPECIAL CONCERN

Next Steps

Northern Flying Squirrel

The PGC has identified a portion of the project (see attached *PGC Survey Maps*), where northern flying squirrels are known to exist, and may be impacted by the proposed project. The PGC is requesting the following for this portion of the project:

- Avoid all clearing activities between April 15th and June 15th to avoid potential impacts to northern flying squirrel young that are expected to be confined to their nests during this period.
- Develop and provide detailed plans and GIS shapefiles illustrating permanent and temporary right of way (ROW) limits for the project.

Please be advised that following our review of the above detailed plans, the PGC will be requesting a northern flying squirrel mitigation plan that may incorporate, but is not limited to, the following components:

- Replanting of the temporary ROW with various species of conifer seedlings, planted no less than 7.5 feet on center, and no more than 10 feet on center.
- Monitoring of the plantings for a minimum of 5 years, at which time 80% survival must be achieved or additional corrective action and monitoring will be required until such time as 80% survival is achieved.
- Installation of glide poles (telephone pole) with horizontal launch beams and shelters on each pole to facilitate northern flying squirrel passage across the cleared ROW.

Allegheny Woodrat

The PGC has identified portions of the proposed project where potential Allegheny woodrat habitat may exist, and could be impacted by the proposed project. The PGC is requesting that Allegheny woodrat surveys be completed in areas specified within the attached *PGC Survey Maps*. The surveys should be completed by a qualified biologist and follow protocols found in the attached *PGC Allegheny Woodrat* guidance document. Please be sure that the following information, at a minimum, is provided for further review and comment by the PGC:

- a 1:24,000 scale copy of a USGS topo map and a GIS shapefile illustrating the locations (i.e. points) of all woodrat activity centers and potential activity centers, as well as the limits (i.e. polygons) of all woodrat habitat sites (central point locations with average width and length measurements will not be accepted to illustrate the habitat sites)
- color photographs, keyed to a location and orientation map, of any woodrat habitat sites, activity centers, potential activity centers, or woodrat sign that are identified during the surveys
- completed Woodrat Habitat Site Survey forms for each habitat site identified during the survey

The survey report should be submitted to the PGC no later than December 31st of the year the survey is completed.

Eastern Small-footed Bat

The PGC has identified portions of the project where potential eastern small-footed bat day roost habitat may exist, and could be impacted by the proposed project. The PGC is requesting that all potential eastern small-footed bat day roost habitat in areas specified within the attached *PGC Survey Maps* be assessed and delineated by a qualified biologist. Please be sure that the following information, at a minimum, is provided for further review and comment by the PGC:

- a 1:24,000 scale copy of a USGS topo map and a GIS shapefile illustrating the limits of all potential small-footed bat day roost habitat that is identified
- a GIS shapefile illustrating the proposed limits of tree clearing throughout the Small-footed Bat Survey Area
- a GIS shapefile illustrating the proposed limits of earthwork, including any proposed grubbing or erosion and sedimentation pollution controls, throughout the Small-footed Bat Survey Area
- representative color photographs of all surface rock encountered during the assessment and delineation regardless of whether the rock is considered to be potential eastern small-footed bat day roost habitat or not (numerous photos for each area of surface rock are strongly recommended)
- a narrative or table detailing the following information for each area of surface rock that is encountered during the assessment and delineation to support or refute the rock's potential as eastern small-footed bat day roost habitat:
    - the estimated canopy cover over the rock
    - anticipated solar exposure of the rock
    - amount and size of crevices available for roost sites
    - presence of organic material, soil, or water within those crevices
    - other details as necessary that cannot be adequately conveyed via the photos provided
- a narrative detailing the reasons for any surface rock encountered not being considered potential small-footed bat day roost habitat
- a photo location and orientation map for all photos provided

The survey report should be submitted to the PGC no later than December 31st of the year the survey is completed.

Northern Long-eared Bats

Northern long-eared bats are a species of special concern and therefore, not target species for additional surveys. However, because of their ecological significance, all trees or dead snags greater than 5 inches in diameter at breast height that need to be harvested to facilitate the project (including any access roads or off-ROW work spaces) should be cut between November 1st and March 31st.

Potential Bat Hibernacula

The PA Department of Environmental Protection's *Abandoned Mine Land (AML) Inventory Points* from www.pasda.psu.edu indicates abandoned mine features may be located within the requested review area. These mine features have the potential to connect to abandoned deep mine workings that can serve as hibernacula for a variety of cave bat species. These AML openings and any undocumented openings and caves located along the proposed alignment and within the review buffer must be assessed following the attached *PGC Protocol for Assessing Bat Use of Potential Hibernacula*. Any features having potential as bat hibernacula will need to be surveyed to determine the presence or absence of bat species. A special use permit will need to be obtained by the consultant in order to conduct such surveys that involve the handling of bats.

State Game Lands

Portions of the proposed project are located on State Game Lands Nos. 91, 119, 40, 141, and 168. Please contact Mr. Peter Sussenbach, Northeast Land Management Supervisor, at 570-675-1143 to discuss and coordinate the project on SGL's 91, 119, 40, and 141, and Mr. Bruce Metz, Southeast Region Land Management Supervisor, at 610-926-3136 to discuss and coordinate the project on SGL 168.

Conservation Measures

National Wetland Inventory Mapping (NWI) and/or aerial photos suggest that wetlands are located within the requested review throughout the proposed project. The PGC is requesting that the final project avoid, or at least minimize to the greatest practical extent, any adverse impacts to these resources and their associated wildlife habitat.

In addition, portions of the project located in Luzerne and Carbon County are within areas where the abundance and species richness of various area-sensitive forest bird species are among the highest in the state. Area-sensitive forest bird species are those species that require a large expanse of relatively contiguous (un-fragmented) forest to maintain their populations. The species found in these areas are listed as species of greatest conservation need in Pennsylvania's Wildlife Action Plan (WAP). The WAP was designed to proactively manage and safeguard the state's declining fish and wildlife resources, and sets a framework to conserve Pennsylvania's diverse wildlife, maintain their role in ecological processes, and protect and enhance species of conservation concern (not just imperiled species). Although these area-sensitive forest bird species are not currently listed as threatened or endangered, and do not produce potential conflicts for projects reviewed using the on-line PNDI Environmental Review Tool, their populations and requisite habitat are either in decline, or are vulnerable to decline in the state.

As a result, the PGC is recommending the following conservation measures be implemented, to the greatest extent practicable, to minimize impacts to these area-sensitive forest bird species and minimize additional fragmentation of forested tracts throughout the project area:

- Co-locate the pipeline and associated facilities with existing roads and other disturbed areas
- Minimize the width of the temporary construction right-of-way (ROW), and avoid grubbing where possible to encourage the re-establishment of woody vegetation

- Minimize the width of the permanent, maintained ROW to only that which is absolutely necessary to maintain the integrity of the pipeline
- Maximize the rotation of mowing and/or clearing along that maintained ROW to allow for the establishment of more beneficial wildlife habitat
- Perform initial tree clearing for the project between August 15th and April 15th
- Use the following seed mixes, or similar herbaceous seed mixes that will minimize competition with volunteer woody plant species, while offering additional wildlife habitat and food sources along the reclaimed ROW:

Steep Slopes	**Other Areas**
1 bushel/acre Annual Cereal Grain (oats in spring, grain rye or wheat in fall)	*1 bushel/acre Annual Cereal Grain (oats in spring, grain rye or wheat in fall)*
10 lbs/acre Timothy	*5 lbs/acre Timothy*
3 lbs/acre Birdsfoot Trefoil	*5 lbs/acre Birdsfoot Trefoil*
4 lbs/acre Little Bluestem	*4 lbs/acre Little Bluestem*
3 lbs/acre Alsike Clover	*2 lbs/acre Indiangrass*
3 lbs/acre Ladino Clover	*1 lb/acre Side-oats Grama*
Straw Mulch, NO HAY	*1 lb/acre Switchgrass*
	¼ lb/acre Black-eyed Susan
	¼ lb/acre Lance-leaved Coreopsis
	Straw Mulch, NO HAY

- Perform any future mowing and/or clearing along the maintained ROW between August 15th and April 15th

This response represents the most up-to-date summary of the PNDI data files and is valid for two (2) years from the date of this letter. An absence of recorded information does not necessarily imply actual conditions on site. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered.

Should the proposed work continue beyond the period covered by this letter, please resubmit the project to the PGC at the following address as an "Update" (including an updated PNDI receipt, project narrative and accurate map):

PA Game Commission
Bureau of Wildlife Habitat Management
Division of Environmental Planning & Habitat Protection
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

If the proposed work has not changed and no additional information concerning listed species is found, the project will be cleared for PNDI requirements by the PGC for an additional 2 years.

This finding applies to impacts to birds and mammals only. To complete your review of state and federally-listed threatened and endangered species and species of special concern, please be sure that the U.S. Fish and Wildlife Service, the PA Department of Conservation and Natural Resources, and/or the PA Fish and Boat Commission have been contacted regarding this project as directed by the online PNDI ER Tool found at www.naturalheritage.state.pa.us.

Please be sure to include the above-referenced PGC ID Number on any future correspondence with the PGC regarding this project.

Sincerely,

John Taucher
Division of Environmental Planning & Habitat Protection
Bureau of Wildlife Habitat Management
Phone: 717-787-4250, Extension 3632
Fax: 717-787-6957
E-Mail:jotaucher@pa.gov

A PNHP Partner

Pennsylvania Natural Heritage Program

JWT/jwt

Enclosures:

PGC Survey Maps
PGC Allegheny Woodrat Guidance Document
PGC Protocol for Assessing Bat Use of Potential Hibernacula

cc: Figured
Trewella
Wenner
Morgan
Sussenbach
Metz
Dunn
Brauning
Turner
Gross
Barber
DiMatteo

Havens
Librandi Mumma
Ms. Stephanie Livelsberger, Pennsylvania Department of Natural Resources
H:\OIL&GAS_PNDI_Reviews\Statewide & Multi-Region Projects

March 30, 2015

Mr. John Taucher
Pennsylvania Game Commission
2001 Elmerton Avenue
Harrisburg, PA 17110

Dear Mr. Taucher:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Spectra Energy Partners; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. Over the past months, PennEast has worked to refine a preferred alternative route and to obtain permissions to survey. To that end, we must inform you that the preferred alternative route has again been adjusted to account for engineering, environmental, and land use constraints that have been identified since we last provided your agency with detailed project mapping on January 14, 2015.

Following feedback from FERC's scoping meetings and numerous conversations with landowners, state and local agencies, and other various stakeholders, PennEast has revised and refined various portions of the preferred alternative route. The largest variations to the previously released route are related to the location of the crossing of the Bethlehem Authority water supply mainline (MP 44 and MP 45), Appalachian Trail crossing (between MP 46 and MP 55), and accommodating future subdivision and housing development plans. Additional field data gained over the last month has helped make smaller adjustments related to environmental surveys and individual discussions with landowners.

In addition to the route variations noted above, an additional interconnect was needed for the Gilbert Power Generation facility in Holland Township, New Jersey, which is fed by a small lateral (12 inches) to supply natural gas to the facility. The previously located interconnection with Elizabethtown Gas was relocated so that both interconnects can be co-located within the power station's industrial property to minimize additional above-ground impacts.

A summary of the significant route variations in Pennsylvania is provided below:

- In Towamensing Township in Carbon County, PA, less than one mile of the alignment has been re-routed ¼-mile to the east as a result of consultations with the Bethlehem Authority (Authority). The alignment has been re-routed between mileposts 44 and 45 to cross the Authority's water supply mainline in a location where it is deeper in an effort to maximize protection of the Authority's resources.

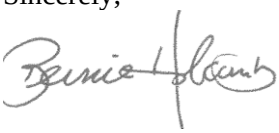
- Straddling the Carbon – Northampton County line in PA, approximately 8 miles of the alignment between mileposts 46 and 55 has been re-routed up to 1 mile to the west of the previous route in an effort to refine the crossing location of the Appalachian Trail.

- In Northampton County, PA, approximately 2.5 miles of the alignment has been re-routed less than ½-mile to the north of the previous route as a result of consultations with private landowners and local officials. The alignment has been re-routed between mileposts 59 and 62 to accommodate current and future land use plans in the area.

Updated GIS shapefiles for the entire new preferred alternative route are being provided to aide in your review and analysis of the project.

We look forward to continuing to work with you and your colleagues on this important project. Please contact me if you have any questions.

Sincerely,



Bernie Holcomb
Pipeline Environmental Services Manager

URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com

Division of Environmental
Planning and Habitat
Protection
717-783-5957

COMMONWEALTH OF PENNSYLVANIA
Pennsylvania Game Commission

2001 ELMERTON AVENUE
HARRISBURG, PA 17110-9797

"To manage all wild birds, mammals and their habitats for current and future generations."

ADMINISTRATIVE BUREAUS:

ADMINISTRATION.....717-787-5670
HUMAN RESOURCES.....717-787-7836
FISCAL MANAGEMENT.....717-787-7314
CONTRACTS AND PROCUREMENT.....717-787-6594
LICENSING.....717-787-2084
OFFICE SERVICES.....717-787-2116
WILDLIFE MANAGEMENT.....717-787-5529
INFORMATION & EDUCATION.....717-787-6286
WILDLIFE PROTECTION.....717-783-6526
WILDLIFE HABITAT MANAGEMENT.....717-787-6818
REAL ESTATE DIVISION.....717-787-6568
AUTOMATED TECHNOLOGY SERVICES.....717-787-4076

www.pgc.state.pa.us

May 5, 2015 **PGC ID Number: 201408190001 Revision**

Bernard Holcomb
URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Bernard.Holcomb@urs.com

Re: Penneast Pipeline Company, LLC – Penneast Pipeline Project (*Revision*)
State Game Lands Nos. 91, 40, 129, and 168
Large Project PNDI Review
Luzerne, Carbon, Northampton, and Bucks Counties, PA

Dear Mr. Holcomb,

Thank you for submitting your Pennsylvania Natural Diversity Inventory (PNDI) Large Project Environmental Review request. The Pennsylvania Game Commission (PGC) screened this project for potential impacts to species and resources of concern under PGC responsibility, which includes birds and mammals only. This is an update to the PNDI letter that was issued on December 28, 2015 based on the revised proposed route that was provided to the PGC on March 31, 2015.

Potential Impact Anticipated

PNDI records indicate species or resources of concern are located in the vicinity of the project. The PGC has received and thoroughly reviewed the information that you provided to this office as well as PNDI data, and has determined that potential impacts to threatened, endangered, and species of special concern may be associated with your project. Therefore, additional measures are necessary to avoid potential impacts to the species listed below:

Scientific Name	Common Name	PA Status	Federal Status
Myotis septentrionalis	Northern Long-eared Bat	THREATENED	THREATENED
Glaucomys sabrinus macrotis	Northern Flying Squirrel	ENDANGERED	N/A
Neotoma magister	Allegheny Woodrat	THREATENED	N/A
Myotis leibii	Eastern Small-footed Bat	THREATENED	N/A
Pandion haliaetus	Osprey	THREATENED	N/A

Next Steps

Northern Long-eared Bats

Northern long-eared bats are a federally listed threatened species under the jurisdiction of the U.S. Fish and Wildlife Service. As a result, our agency defers comments on potential impacts to Northern long-eared bats to the U.S. Fish and Wildlife Service.

Northern Flying Squirrel

The PGC has identified a portion of the project (see attached *PGC Survey Maps*), where northern flying squirrels are known to exist, and may be impacted by the proposed project. The PGC is requesting the following for this portion of the project:

- Avoid all clearing activities between April 15th and June 15th to avoid potential impacts to northern flying squirrel young that are expected to be confined to their nests during this period.
- Develop and provide detailed plans and GIS shapefiles illustrating permanent and temporary right of way (ROW) limits for the project.

Please be advised that following our review of the above detailed plans, the PGC will be requesting a northern flying squirrel mitigation plan that may incorporate, but is not limited to, the following components:

- Replanting of the temporary ROW with various species of conifer seedlings, planted no less than 7.5 feet on center, and no more than 10 feet on center.
- Monitoring of the plantings for a minimum of 5 years, at which time 80% survival must be achieved or additional corrective action and monitoring will be required until such time as 80% survival is achieved.
- Installation of glide poles (telephone pole) with horizontal launch beams and shelters on each pole to facilitate northern flying squirrel passage across the cleared ROW.

Allegheny Woodrat

The PGC has identified portions of the proposed project where potential Allegheny woodrat habitat may exist, and could be impacted by the proposed project. The PGC is requesting that Allegheny woodrat surveys be completed in areas specified within the attached *PGC Survey Maps*. The surveys should be completed by a qualified biologist and follow protocols found in the *PGC Allegheny Woodrat* guidance document. Please be sure that the following information, at a minimum, is provided for further review and comment by the PGC:

- a 1:24,000 scale copy of a USGS topo map and a GIS shapefile illustrating the locations (i.e. points) of all woodrat activity centers and potential activity centers, as well as the limits (i.e. polygons) of all woodrat habitat sites (central point locations with average width and length measurements will not be accepted to illustrate the habitat sites)
- color photographs, keyed to a location and orientation map, of any woodrat habitat sites, activity centers, potential activity centers, or woodrat sign that are identified during the surveys

- completed Woodrat Habitat Site Survey forms for each habitat site identified during the survey

The survey report should be submitted to the PGC no later than December 31st of the year the survey is completed.

Eastern Small-footed Bat

The PGC has identified portions of the project where potential eastern small-footed bat day roost habitat may exist, and could be impacted by the proposed project. The PGC is requesting that all potential eastern small-footed bat day roost habitat in areas specified within the attached *PGC Survey Maps* be assessed and delineated by a qualified biologist. Please be sure that the following information, at a minimum, is provided for further review and comment by the PGC:

- a 1:24,000 scale copy of a USGS topo map and a GIS shapefile illustrating the limits of all potential small-footed bat day roost habitat that is identified
- a GIS shapefile illustrating the proposed limits of tree clearing throughout the Small-footed Bat Survey Area
- a GIS shapefile illustrating the proposed limits of earthwork, including any proposed grubbing or erosion and sedimentation pollution controls, throughout the Small-footed Bat Survey Area
- representative color photographs of all surface rock encountered during the assessment and delineation regardless of whether the rock is considered to be potential eastern small-footed bat day roost habitat or not (numerous photos for each area of surface rock are strongly recommended)
- a narrative or table detailing the following information for each area of surface rock that is encountered during the assessment and delineation to support or refute the rock's potential as eastern small-footed bat day roost habitat:
    - the estimated canopy cover over the rock
    - anticipated solar exposure of the rock
    - amount and size of crevices available for roost sites
    - presence of organic material, soil, or water within those crevices
    - other details as necessary that cannot be adequately conveyed via the photos provided
- a narrative detailing the reasons for any surface rock encountered not being considered potential small-footed bat day roost habitat
- a photo location and orientation map for all photos provided

The survey report should be submitted to the PGC no later than December 31st of the year the survey is completed.

Osprey

The PGC has identified a portion of the project (see attached *PGC Survey Maps*), where have known to nest, and may be impacted by the proposed project. The PGC is requesting the following seasonal restriction for this portion of the project:

- No activities related to this project shall occur within the Osprey Restriction area identified on Map 3 of the attached PGC Survey Maps during the nesting season, Mach 25 through July 31. All project related activities shall be completed in this area between August 1 and March 24.

Potential Bat Hibernacula

The PA Department of Environmental Protection's *Abandoned Mine Land (AML) Inventory Points* from www.pasda.psu.edu indicates abandoned mine features may be located within the requested review area. These mine features have the potential to connect to abandoned deep mine workings that can serve as hibernacula for a variety of cave bat species. These AML openings and any undocumented openings and caves located along the proposed alignment and within the review buffer must be assessed following the *PGC Protocol for Assessing Bat Use of Potential Hibernacula*. Any features having potential as bat hibernacula will need to be surveyed to determine the presence or absence of bat species. A special use permit will need to be obtained by the consultant in order to conduct such surveys that involve the handling of bats.

State Game Lands

Portions of the proposed project are located on State Game Lands Nos. 91, 40, 129, and 168. Please contact Mr. Peter Sussenbach, Northeast Land Management Supervisor, at 570-675-1143 to discuss and coordinate the project on SGL's 91, 40, and 129, and Mr. Dave Mitchell, Southeast Region Land Management Supervisor, at 610-926-3136 to discuss and coordinate the project on SGL 168.

Conservation Measures

National Wetland Inventory Mapping (NWI) and/or aerial photos suggest that wetlands are located within the requested review throughout the proposed project. The PGC is requesting that the final project avoid, or at least minimize to the greatest practical extent, any adverse impacts to these resources and their associated wildlife habitat.

In addition, portions of the project located in Luzerne and Carbon County are within areas where the abundance and species richness of various area-sensitive forest bird species are among the highest in the state. Area-sensitive forest bird species are those species that require a large expanse of relatively contiguous (un-fragmented) forest to maintain their populations. The species found in these areas are listed as species of greatest conservation need in Pennsylvania's Wildlife Action Plan (WAP). The WAP was designed to proactively manage and safeguard the state's declining fish and wildlife resources, and sets a framework to conserve Pennsylvania's diverse wildlife, maintain their role in ecological processes, and protect and enhance species of conservation concern (not just imperiled species). Although these area-sensitive forest bird species are not currently listed as threatened or endangered, and do not produce potential conflicts for projects reviewed using the on-line PNDI Environmental Review Tool, their populations and requisite habitat are either in decline, or are vulnerable to decline in the state.

As a result, the PGC is recommending the following conservation measures be implemented, to the greatest extent practicable, to minimize impacts to these area-sensitive forest bird species and minimize additional fragmentation of forested tracts throughout the project area:

- Co-locate the pipeline and associated facilities with existing roads and other disturbed areas
- Minimize the width of the temporary construction right-of-way (ROW), and avoid grubbing where possible to encourage the re-establishment of woody vegetation
- Minimize the width of the permanent, maintained ROW to only that which is absolutely necessary to maintain the integrity of the pipeline
- Maximize the rotation of mowing and/or clearing along that maintained ROW to allow for the establishment of more beneficial wildlife habitat
- Perform initial tree clearing for the project between August 15th and April 15th
- Use the following seed mixes, or similar herbaceous seed mixes that will minimize competition with volunteer woody plant species, while offering additional wildlife habitat and food sources along the reclaimed ROW:

Steep Slopes	**Other Areas**
1 bushel/acre Annual Cereal Grain (oats in spring, grain rye or wheat in fall)	*1 bushel/acre Annual Cereal Grain (oats in spring, grain rye or wheat in fall)*
10 lbs/acre Timothy	*5 lbs/acre Timothy*
3 lbs/acre Birdsfoot Trefoil	*5 lbs/acre Birdsfoot Trefoil*
4 lbs/acre Little Bluestem	*4 lbs/acre Little Bluestem*
3 lbs/acre Alsike Clover	*2 lbs/acre Indiangrass*
3 lbs/acre Ladino Clover	*1 lb/acre Side-oats Grama*
Straw Mulch, NO HAY	*1 lb/acre Switchgrass*
	¼ lb/acre Black-eyed Susan
	¼ lb/acre Lance-leaved Coreopsis
	Straw Mulch, NO HAY

- Perform any future mowing and/or clearing along the maintained ROW between August 15th and April 15th

This response represents the most up-to-date summary of the PNDI data files and is valid for two (2) years from the date of this letter. An absence of recorded information does not necessarily imply actual conditions on site. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered.

Should the proposed work continue beyond the period covered by this letter, please resubmit the project to the PGC at the following address as an "Update" (including an updated PNDI receipt, project narrative and accurate map):

PA Game Commission
Bureau of Wildlife Habitat Management

Division of Environmental Planning & Habitat Protection
2001 Elmerton Avenue
Harrisburg, PA 17110-9797

If the proposed work has not changed and no additional information concerning listed species is found, the project will be cleared for PNDI requirements by the PGC for an additional 2 years.

This finding applies to impacts to birds and mammals only. To complete your review of state and federally-listed threatened and endangered species and species of special concern, please be sure that the U.S. Fish and Wildlife Service, the PA Department of Conservation and Natural Resources, and/or the PA Fish and Boat Commission have been contacted regarding this project as directed by the online PNDI ER Tool found at www.naturalheritage.state.pa.us.

Please be sure to include the above-referenced PGC ID Number on any future correspondence with the PGC regarding this project.

Sincerely,

John Taucher

John Taucher
Division of Environmental Planning & Habitat Protection
Bureau of Wildlife Habitat Management
Phone: 717-787-4250, Extension 3632
Fax: 717-787-6957
E-Mail:jotaucher@pa.gov

A PNHP Partner

PNHP
Pennsylvania Natural Heritage Program

JWT/jwt

Enclosures:
PGC Survey Maps

cc: Figured
Metz
Wenner
Morgan
Sussenbach
Mitchell
Dunn
Brauning
Turner

Gross
Barber
DiMatteo
Havens
Librandi Mumma
Ms. Stephanie Livelsberger, Pennsylvania Department of Natural Resources
H:\OIL&GAS_PNDI_Reviews\Statewide & Multi-Region Projects

Poppel, Deborah

From: Poppel, Deborah
Sent: Thursday, December 17, 2015 11:27 AM
To: 'jotaucher@pa.gov'
Subject: FW: PennEast update notice
Attachments: PennEast_ProposedRoute_20151214.kmz; PENNEAST_SHAPEFILES_ToDistribute.piz

On behalf of PennEast Pipeline Company (PennEast), thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company; PSEG Power; SJI Midstream; Spectra Energy Partners; and UGI Energy Services.

As an interstate natural gas pipeline, PennEast Pipeline will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. PennEast filed Certificates of Public Convenience and Necessity and Related Authorizations with FERC on September 24, 2015. Since the September 24 filing, PennEast has evaluated several additional route alternatives based on discussions with landowners, regulatory agencies and other stakeholders, as well as comments filed in this proceeding. In light of those evaluations, PennEast has adopted five minor deviations from the route proposed in the September 24 Filing:

Deviation No. 1005 is located between mileposts ("MP") 9.07 and 12.10 in Luzerne County, Pennsylvania. PennEast adopted this deviation to address landowner concerns and to improve constructability of the proposed Project route. The landowner and quarry operators affected by this portion of the proposed Project route indicated that the proposed route in the September 24 Filing has the potential to adversely affect quarry operations. Additionally, this portion of the route in the September 24 Filing route presented a challenging crossing of Mill Creek. Deviation No. 1005 addresses both of these concerns. In addition, this deviation reduces the overall length of the Project and increases the route's co-location with existing utility easements.

Deviation No. 1400 is located between MP 43.95 and 44.55 in Carbon County, Pennsylvania. This deviation has been adopted based on feedback that PennEast received in collaboration with the Bethlehem Authority, which operates a water supply system in Carbon and Northampton Counties, Pennsylvania. Deviation No. 1400 provides a means of crossing the Bethlehem Authority waterline by a trenchless method and avoids the need to locate temporary workspace near the waterline. This deviation also includes a single HDD crossing of Beltzville Lake, instead of the two crossings that were proposed in the September 24 Filing, which minimizes impacts to the Beltzville State Park.

Deviation No. 1701 is located between MP 79.10 and 81.60 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route and is based on feedback that PennEast received in collaboration with the New Jersey Department of Environmental Protection. Deviation No. 1701 minimizes impacts to the New Jersey Natural Lands Trust's Gravel Hill Preserve by increasing co-location with existing utility easements and impacting fewer parcels within the Gravel Hill Preserve. In addition, this deviation allows the proposed route to be in closer proximity to the proposed NRG REMA, LLC/Elizabethtown Gas delivery meter station, and it also relocates a proposed mainline valve from a residential area to an industrial area.

Deviation No. 1802 is located between MP 84.68 and 86.54 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route to avoid crossing a federally preserved farm. PennEast considered different alternatives to avoid this crossing, and the adopted Deviation No. 1802 minimizes land use impacts and overall land requirements to avoid this crossing.

Deviation No. 1900 is located between MP 91.91 and 93.55 in Hunterdon County, New Jersey. This deviation has been adopted to incorporate a route optimization that avoids crossing the Lockatong Creek three times with an open cut. This deviation now allows the Project route to cross the Lockatong Creek using a trenchless method. Deviation No. 1900 also avoids impacts to both a federally preserved farm and a New Jersey Green Acres Program protected parcel.

An updated Google Earth kmz file and GIS shapefiles for the proposed route are attached to aide in your review and analysis of the Project. (To open the shapefiles, please add a ".zip" extension to the file and then extract the files.) Please let us know if you have any difficulty opening the attached files.

Deborah Poppel, CWB
Senior Ecologist/Project Manager
Impact Assessment & Permitting, Environment
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Delaware River Basin Commission

August 19, 2014

Mr. Steve Tambini
Executive Director

Delaware River Basin Commission
25 State Police Drive
P.O. Box 7360
West Trenton, NJ 08628-0360

Re: Project Review
PennEast Pipeline Company, LLC - PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Delaware Counties, PA
Hunterdon and Mercer Counties, NJ

Dear Mr. Tambini:

The PennEast Pipeline Company, LLC (PennEast), is a partnership with UGI Energy Services (UGIES), AGL Resources, NJR Pipeline Company, and South Jersey Industries. The PennEast Pipeline Project (Project) proposes to construct a new 100-mile, 30-inch pipeline to deliver natural gas from northeast Pennsylvania to other markets in Pennsylvania and New Jersey. This new supply of natural gas will bring lower cost supplies to residents and businesses in Pennsylvania and New Jersey, while enhancing pipeline system flexibility and reliability for the local gas utilities.

On behalf of PennEast, URS Corporation (URS) is providing this introduction to the Project along with supplementary information for your consideration. Portions of the proposed pipeline alignment fall within the Delaware River basin and, as such, PennEast intends to file permit applications for water withdrawals for hydrostatic testing and associated discharges. As the project is currently in the preliminary design stage, water withdrawal volumes and discharge points have not been determined at this time. We will be setting up interagency meetings in the near future prior to permit application filings and would appreciate your participation.

A critical issues analysis was conducted for multiple routes using readily available secondary source data to select the **Least Environmentally Damaging Practicable Alternative (LEDPA)** route. Mapping depicting the environmental features evaluated for the preferred alternative is enclosed. We are providing this preliminary Project information prior to the initiation of wetland and watercourse field surveys to be conducted this fall. The environmental

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
Fax: 610.832.3501

study area will be a 400-foot corridor centered on the approximately 100-mile alignment. The anticipated permanent right-of-way (ROW) and temporary construction work area will be approximately 100-feet. The study area is wider than the disturbance area to allow for minor alignment shifts to avoid any sensitive resources that may be identified during the environmental field investigations.

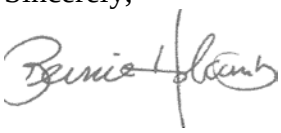
PennEast intends to file its certificate application for the PennEast Pipeline Project with the Federal Energy Regulatory Commission (FERC) in mid-2015, and anticipates receiving authorization and starting construction in 2017. Permit applications with other federal, state, and local agencies will be submitted within similar timeframes as the certificate application. The permit proceedings conducted by these agencies will provide additional opportunities for public input and involvement. FERC's determination of public convenience and necessity includes a thorough, comprehensive environmental review of proposed projects, working closely with federal, state, and local agencies and in accordance with the National Environmental Policy Act (NEPA).

The following are enclosed to facilitate your review:

- PennEast Project Fact Sheet; and
- CD containing:
    - USGS 7.5 minute quadrangle maps with project alignment; and
    - detailed maps depicting the project areas and known secondary source resources

If you have any questions or require additional information regarding this project, please contact me at 610.832.1810 or bernard.holcomb@urs.com.

Sincerely,



Bernard Holcomb
Pipeline Environmental Services Manager
Enclosures (2)

cc: Mr. Anthony Cox (UGI)
Mr. Dante D'Alessandro (UGI)

URS Corporation
625 W. Ridge Pike, Suite E-100
Conshohocken, PA 19428
Phone: 610.832.3500
Fax: 610.832.3501

Delaware River Basin Commission
DELAWARE • NEW JERSEY
PENNSYLVANIA • NEW YORK
UNITED STATES OF AMERICA

Delaware River Basin Commission
25 State Police Drive
PO Box 7360
West Trenton, New Jersey
08628-0360
Phone: (609) 883-9500 Fax: (609) 883-9522
Web Site: http://www.drbc.net

Steven J. Tambini, P.E.
Executive Director

November 14, 2014

Via US Certified Mail, Return Receipt
7012 3050 0001 7948 9866

Alisa E. Harris, Government and Community Affairs
PennEast Pipeline Company, LLC
One Meridian Boulevard, Suite 2C01
Wyomissing, PA 19610

SUBJECT: PennEast Natural Gas Transmission Pipeline Project
FERC Docket No. PF15-1-000
Luzerne, Carbon Northampton and Pike Counties, PA and
Hunterdon and Mercer Counties, NJ

Dear Ms. Harris:

The Delaware River Basin Commission staff have examined recent submissions by the PennEast Pipeline Company, LLC ("PennEast") to the Federal Energy Regulatory Commission (FERC) and the New Jersey Department of Environmental Protection (NJDEP), including the "Request for Approval of Pre-Filing Review" ("FERC pre-filing request") dated October 7, 2014, and the Permit Readiness Checklist submitted to NJDEP on October 23, 2014. We have also reviewed route updates submitted by PennEast representatives to DRBC staff since our September 3, 2014 information meeting.

These materials indicate that the PennEast Natural Gas Transmission Pipeline Project ("Project") involves the following components:

(a) Mainline Route. The mainline route includes construction of approximately 108 miles of 36-inch diameter mainline pipeline that originates near Dallas, Luzerne County, PA, and terminates near Pennington, Mercer County, NJ. Approximately 29 percent of the pipeline is co-located with other utilities. Major water crossings include the Susquehanna, Lehigh, and Delaware Rivers and Beltzville Lake. The system is rated for a maximum allowable operating pressure ("MAOP") of 1,480 pounds per square inch gauge.

(b) Compressor Station. A Compressor Station is proposed to be located near Blakeslee in Kidder Township, Carbon County, PA. The compressor station will include 3 Taurus 70 units rated at 10,915 horsepower each under international standard (ISO) conditions for a total of 26,733 available horsepower.

(c) Additional mainline valves and appurtenant facilities.

Based on the submissions identified above, DRBC staff have determined that the Project is subject to review under Section 3.8 of the Delaware River Basin Compact and implementing regulations. Specifically:

1. The Commission's Rules of Practice and Procedure (RPP) provide that natural gas transmission lines are subject to Section 3.8 review and approval by the Commission when they pass in, on, under or across an existing or proposed reservoir or recreation project area as designated in the Comprehensive Plan. *See* RPP § 2.3.5.A 12.

The currently proposed route of the Project crosses the following reservoirs and recreation areas as designated in the Comprehensive Plan: Beltzville Reservoir (Towamensing Twp., PA), Francis E. Walter Reservoir (Bear Creek Twp. and Kidder Twp., PA), Hickory Run State Park (Kidder Twp., PA), Beltzville State Park (Towamensing Twp., PA), Delaware Canal State Park (Riegelsville Borough, PA), the Lower Delaware River Wild & Scenic Area (Holland Twp., NJ) and potentially, Washington Crossing State Park (West Amwell Twp., NJ). *See* Comprehensive Plan (July 2001), Sections II and III *at*: http://www.state.nj.us/drbc/library/documents/comprehensive_plan.pdf

2. At the September 3, 2014 meeting among PennEast representatives and DRBC staff, the former indicated that hydrostatic testing of the pipeline would be conducted to verify integrity and to ensure the ability of the pipeline to withstand the designed maximum operating pressure. PennEast representatives also indicated that the water would be sourced from either surface water bodies or municipal suppliers along the pipeline route.

PennEast's recent submissions confirm that hydrostatic testing will be performed but do not indicate the sources of the water. Please be advised that:

a. The RPP provide that Section 3.8 review and approval are required for daily average gross water withdrawals – whether from surface water or groundwater – of more than 100,000 gpd during any 30 consecutive day period. *See* RPP §§ 2.3.5 A 2. and 3.

b. If hydrostatic test water is drawn from sources that have a current DRBC docket (or dockets) and if no increase in an approved DRBC allocation is needed, then the use of basin water for hydrostatic testing does not require separate DRBC approval. No approval is required for a daily average gross withdrawal that does not exceed 100,000 gallons over any 30 consecutive-day period.

c. If 100,000 gpd or more of water is to be imported – i.e. drawn from a source (or sources) outside the Delaware River Basin for use within the Basin – or exported – i.e., drawn from a source (or sources) within the Basin for use outside it, then DRBC review and approval are required in accordance with the Water Code (WC) and the RPP. *See* WC § 2.30 and RPP §§ 2.3.4 A.16. and 17.

3. The RPP provides that facilities for the direct discharge of industrial wastewater to surface or ground waters of the basin are subject to Section 3.8 review and approval; however facilities

designed for the direct discharge to surface or ground waters of industrial waste having design capacities of less than 10,000 gpd in the drainage area of Special Protection Waters or less than 50,000 gpd elsewhere in the basin do not require review. *See* RPP § 2.3.5 A.5. Because pipeline hydrostatic testing water is generally discharged at rates exceeding the Commission's exemption thresholds, the Project is expected to be subject to DRBC review and approval on this basis.

We recognize that the Project alignment and other decisions are still undergoing revision and may change. As details are finalized, DRBC staff may identify other aspects of the Project that trigger Commission review and approval. Regardless of the number or nature of review triggers, the Commission will issue a single decision instrument (a "docket"), containing any conditions the Commission deems necessary to ensure that the Project does not impair or conflict with the Comprehensive Plan (CP), consisting of the rules, projects and polices the Commission has adopted "for the optimum planning, development, conservation, utilization, management and control of the water resources of the basin to meet present and future needs." *See* Compact, § 13.1.

I ask that within 90 calendar days of receipt of this letter you complete and submit to the attention of Project Review Section Supervisor David Kovach DRBC application forms for the PennEast Pipeline as listed below. All forms can be downloaded from DRBC's website at http://www.state.nj.us/drbc/programs/project/application/index.html.

- Applicant's Statement — Project Review Fee Form
- Discharge Application
- Withdrawal Application

Be advised that DRBC review and approval are required prior to the commencement of any water withdrawal, discharge or earth disturbance activities.

David Kovach will contact you to arrange a pre-application meeting with Commission staff. In the interim, you are welcome to contact me at extension 221 or David at extension 264 with any questions you may have about DRBC's review.

Sincerely,

William J. Muszynski, P.E.
Water Resources Management Branch Manager

c: Bernie Holcomb, URS
Kimberly D. Bose, Secretary, FERC
Medha Kochhar, Project Manager, FERC
DRBC Commissioners

March 30, 2015

Ms. Pamela Bush
Delaware River Basin Commission
25 State Police Drive
P.O. Box 7260
West Trenton, NJ 08628

Dear Ms. Bush:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Spectra Energy Partners; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. Over the past months, PennEast has worked to refine a preferred alternative route and to obtain permissions to survey. To that end, we must inform you that the preferred alternative route has again been adjusted to account for engineering, environmental, and land use constraints that have been identified since we last provided your agency with detailed project mapping on January 14, 2015.

Following feedback from FERC's scoping meetings and numerous conversations with landowners, state and local agencies, and other various stakeholders, PennEast has revised and refined various portions of the preferred alternative route. The largest variations to the previously released route are related to the location of the crossing of the Bethlehem Authority water supply mainline (MP 44 and MP 45), Appalachian Trail crossing (between MP 46 and MP 55), and accommodating future subdivision and housing development plans. Additional field data gained over the last month has helped make smaller adjustments related to environmental surveys and individual discussions with landowners.

In addition to the route variations noted above, an additional interconnect was needed for the Gilbert Power Generation facility in Holland Township, New Jersey, which is fed by a small lateral (12 inches) to supply natural gas to the facility. The previously located interconnection with Elizabethtown Gas was relocated so that both interconnects can be co-located within the power station's industrial property to minimize additional above-ground impacts.

A summary of the significant route variations is provided below:

- In Towamensing Township in Carbon County, PA, less than one mile of the alignment has been re-routed ¼-mile to the east as a result of consultations with the Bethlehem Authority (Authority). The alignment has been re-routed between mileposts 44 and 45 to cross the Authority's water supply mainline in a location where it is deeper in an effort to maximize protection of the Authority's resources.

- Straddling the Carbon – Northampton County line in PA, approximately 8 miles of the alignment between mileposts 46 and 55 has been re-routed up to 1 mile to the west of the previous route in an effort to refine the crossing location of the Appalachian Trail.

- In Northampton County, PA, approximately 2.5 miles of the alignment has been re-routed less than ½-mile to the north of the previous route as a result of consultations with private landowners and local officials. The alignment has been re-routed between mileposts 59 and 62 to accommodate current and future land use plans in the area.

- In Holland Township, Hunterdon County, NJ, a new 12-inch lateral is needed to run from milepost 76.6 on the mainline pipeline route approximately ½-mile south to an interconnect with Elizabethtown Gas and the Gilbert Power Generation facility. The previously located interconnection with Elizabethtown Gas was relocated so that both interconnects can be co-located within the power station's industrial property to minimize additional above-ground impacts.

- In Holland Township, Hunterdon County, NJ, approximately two miles of the alignment has been re-routed less than ½-mile to the south of the previous route to accommodate a future private development planned for the area.

- In West Amwell Township, Hunterdon County, NJ, approximately 1 mile of the alignment has been re-routed up to 1,000 feet east of the previous route to avoid a newly constructed home that was identified by a landowner.

Updated GIS shapefiles for the entire new preferred alternative route are being provided to aide in your review and analysis of the project.

We look forward to continuing to work with you and your colleagues on this important project. Please contact me if you have any questions.

Sincerely,

Bernie Holcomb

Pipeline Environmental Services Manager

URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com

Cope, Wade

From:	Cope, Wade
Sent:	Thursday, December 17, 2015 3:16 PM
To:	Bush, Pamela
Subject:	DRBC | PennEast Update Notice
Attachments:	PennEast_ProposedRoute_20151214.kmz; PENNEAST_SHAPEFILES_ToDistribute.zip

Good Afternoon,

On behalf of PennEast Pipeline Company (PennEast), thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company; PSEG Power; SJI Midstream; Spectra Energy Partners; and UGI Energy Services.

As an interstate natural gas pipeline, PennEast Pipeline will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. PennEast filed Certificates of Public Convenience and Necessity and Related Authorizations with FERC on September 24, 2015. Since the September 24 filing, PennEast has evaluated several additional route alternatives based on discussions with landowners, regulatory agencies and other stakeholders, as well as comments filed in this proceeding. In light of those evaluations, PennEast has adopted five minor deviations from the route proposed in the September 24 Filing:

- Deviation No. 1005 is located between mileposts ("MP") 9.07 and 12.10 in Luzerne County, Pennsylvania. PennEast adopted this deviation to address landowner concerns and to improve constructability of the proposed Project route. The landowner and quarry operators affected by this portion of the proposed Project route indicated that the proposed route in the September 24 Filing has the potential to adversely affect quarry operations. Additionally, this portion of the route in the September 24 Filing route presented a challenging crossing of Mill Creek. Deviation No. 1005 addresses both of these concerns. In addition, this deviation reduces the overall length of the Project and increases the route's co-location with existing utility easements.

- Deviation No. 1400 is located between MP 43.95 and 44.55 in Carbon County, Pennsylvania. This deviation has been adopted based on feedback that PennEast received in collaboration with the Bethlehem Authority, which operates a water supply system in Carbon and Northampton Counties, Pennsylvania. Deviation No. 1400 provides a means of crossing the Bethlehem Authority waterline by a trenchless method and avoids the need to locate temporary workspace near the waterline. This deviation also includes a single HDD crossing of Beltzville Lake, instead of the two crossings that were proposed in the September 24 Filing, which minimizes impacts to the Beltzville State Park.

- Deviation No. 1701 is located between MP 79.10 and 81.60 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route and is based on feedback that PennEast received in collaboration with the New Jersey Department of Environmental Protection. Deviation No. 1701 minimizes impacts to the New Jersey Natural Lands Trust's Gravel Hill Preserve by increasing co-location with existing utility easements and impacting fewer parcels within the Gravel Hill Preserve. In addition, this deviation allows the proposed route to be in closer proximity to the proposed NRG REMA, LLC/Elizabethtown Gas delivery meter station, and it also relocates a proposed mainline valve from a residential area to an industrial area.

- Deviation No. 1802 is located between MP 84.68 and 86.54 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route to avoid crossing a federally preserved

farm. PennEast considered different alternatives to avoid this crossing, and the adopted Deviation No. 1802 minimizes land use impacts and overall land requirements to avoid this crossing.

- Deviation No. 1900 is located between MP 91.91 and 93.55 in Hunterdon County, New Jersey. This deviation has been adopted to incorporate a route optimization that avoids crossing the Lockatong Creek three times with an open cut. This deviation now allows the Project route to cross the Lockatong Creek using a trenchless method. Deviation No. 1900 also avoids impacts to both a federally preserved farm and a New Jersey Green Acres Program protected parcel.

An updated Google Earth kmz file and GIS shapefiles for the proposed route are attached to aide in your review and analysis of the Project. (To open the shapefiles, please add a ".zip" extension to the file and then extract the files.) Please let us know if you have any difficulty opening the attached files.

Thank you,

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Letter of Transmittal

Eric Engle Date: February 12, 2016

Project reference: PennEast Pipeline Project Project number:

We are sending you the following:

Number of originals:	Number of copies:	Description:
	1	DRBC Water Withdrawal and Discharge Application (revised electronic copy)

Dear Eric,

A revised CD of PennEast's application is enclosed, which includes Appendices F-I that were missing on our 2/5/15 CD. Please destroy the old version or mark it as dated. If you have any questions regarding the enclosed materials please do not hesitate to contact me at 610-832-2713 or sarah.binckley@aecom.com.

Thank you,

Sarah K. Binckley

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www.aecom.com

610 832 3500 tel
610 832 3501 fax

March 31, 2016

Eric Engle
Project Reviewer
Delaware River Basin Commission
25 State Police Drive
West Trenton, New Jersey 08628

Re: PennEast Pipeline Company, LLC.
PennEast Pipeline Project
Delaware River Basin Commission Application – Supplemental Information

Dear Mr. Engle:

On behalf of PennEast Pipeline Company, LLC (PennEast), AECOM has prepared the enclosed supplemental information package for the PennEast Pipeline Project water withdrawal and discharge application that was submitted on February 5, 2016. This supplemental information package includes tables and figures that have been updated to reflect route changes that PennEast filed with the Federal Energy Regulatory Commission (FERC) on February 22, 2016. The first table in the package lists each DRBC application component that PennEast submitted on February 5, 2016, and states whether or not the route changes resulted in a need to update each application component. The updated tables and figures are presented in the order outlined on the summary table. Please find enclosed one hardcopy and one electronic copy of the supplemental information package for your review.

PennEast has also enclosed courtesy electronic copies of the Joint Permit Applications that were submitted to the Pennsylvania Department of Environmental Protection (PADEP) in February 2016 and the Erosion and Sediment Control General Permit (ESCGP-2) application that was submitted to the PADEP, Bucks County Conservation District, Carbon County Conservation District, Luzerne Conservation District, and Northampton County Conservation District in March 2016.

Thank you for your time and effort in reviewing this application. Please feel free to contact me at (610) 832-2713 or sarah.binckley@aecom.com if you need any additional information.

Sincerely,

AECOM CORPORATION

Sarah K. Binckley

Sarah Binckley, PWS
Biologist

cc: Tony Cox, PennEast Pipeline Company LLC

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610 832 3501 fax

July 22, 2016

Eric Engle, P.G.
Delaware River Basin Commission
Water Resources Management Branch
PO Box 7360
25 State Police Drive
West Trenton, NJ 08628-0360

Re: PennEast Pipeline Project
Response to DRBC May 23, 2016 Comments

Dear Mr. Engle:

Pursuant to the PennEast Pipeline Project and on behalf of PennEast Pipeline Company, LLC (PennEast), please find enclosed AECOM's response to the Delaware River Basin Commission's (DRBC) comments sent via email on May 23, 2016. AECOM has addressed the items DRBC listed for resubmittal or submission of additional information to supplement PennEast's original application.

DRBC's Items for Resubmittal or Submission of Additional Information

1) **The Application indicates that DRBC receipt of approval expected in March 2017. Narrative (Section 2.1) indicates that some construction work is expected to begin third quarter of 2016 and winter tree clearing scheduled to commence October 2016.**
We realize that the project schedule has changed, however, please be advised that Article 3, Section 2.3.4.E of the Delaware River Basin Commission's Rules of Practice and Procedure states:

"Whenever a project is subject to review and approval by the Commission under this section, there shall be no substantial construction activity thereon, including related preparation of land, unless and until the project has been approved by the Commission; provided, however, that this prohibition shall not apply to the drilling of wells for purposes of obtaining geohydrologic data, nor to in-plant control and pretreatment facilities for pollution abatement."

AECOM Response:
Based on the Notice of Schedule that the Federal Energy Regulatory Commission (FERC) released on March 29, 2016, PennEast anticipates an in-service date in the second half of 2018. To meet the anticipated in-service date, winter tree clearing and some construction work are scheduled to commence in late 2017 and early 2018.

2) **We have a shapefile of the pipeline from mid-December 2015 and an updated KMZ file showing the 400 feet of center line (Feb 2016). Please submit a Shapefile of the current route (centerline, mileposts and above ground facilities).**

AECOM Response:
Updated shapefiles for the current pipeline route, mileposts, and aboveground facilities filed with FERC in February 2016 are provided on the enclosed CD as Enclosure 1.

3) **The PADEP Application included Erosion and Sediment Pollution Control Plans for Pennsylvania. Are the E&SCP's referenced in the NJ wetland and waterbody tables available?**

AECOM Response:
A Project-wide Erosion and Sediment Control Plan (E&SCP) narrative has been prepared for the Project and submitted to the FERC as a part of PennEast's FERC September 2015 Application. This narrative was provided as Appendix C in PennEast's DRBC February 2016 Application. Since that time, PennEast has prepared a site-specific E&SCP for the Pennsylvania portions of the Project which meets the 25 PA Code Chapter 102 requirements. This site-specific plan includes a narrative and drawings, which were submitted to the Pennsylvania Department of Environmental Protection (PADEP) in February 2016 as part of the Joint Permit Application, and submitted to the PADEP, Bucks County Conservation District, Carbon Conservation District, Luzerne Conservation District, and Northampton County Conservation District in March 2016 as part of the Erosion and Sediment Control General Permit (ESCGP-2) application. The E&SCP was updated in June 2016 in response to administrative incompleteness letters from the PADEP, and the revised plan narrative and drawing package is provided on the enclosed CD as Enclosure 2.

A site-specific E&SCP is currently being developed for the New Jersey portion of the Project. Upon completion of PennEast's New Jersey E&SCP, AECOM will provide an electronic copy to the DRBC. This E&SCP will be reviewed by county soil conservation districts during the permitting process. Alignment sheets that do not yet show erosion and sediment controls have been developed for the New Jersey portion of the Project, and they were filed with the FERC on May 16, 2016. Electronic copies of the alignment sheets are provided on the enclosed CD as Enclosure 3.

4) **Plans showing the locations of above ground facilities, access roads and pipeyards were found on the FEMA Floodplain Maps included with the DRBC Application and also in the PADEP Application materials. We could not locate maps showing the locations of the staging areas.**

AECOM Response:
The FEMA Floodplain Maps have been revised to show proposed staging areas. The revised mapbook is provided on the enclosed CD as Enclosure 4.

5) **Please indicate if detailed plans showing actual withdrawal locations and equipment setup details have been developed for each water withdrawal source and discharge location.**

AECOM Response:
Detailed plans showing withdrawal and discharge locations and equipment setup have not been developed at this time. Information from water source owners, surface water source locations, and equipment vendors will continue to be collected and reviewed prior to proceeding with plan development. Detailed plans can be provided to the DRBC when available; general plans that will be followed are as provided in the February 5, 2016 application narrative.

6) **Wetland and Stream Crossing tables in excel format were included in the PADEP permit applications. Please confirm that this copy is still the most recent. Is the NJ wetland and waterbody crossing information available in excel format?**

AECOM Response:
PennEast updated the Pennsylvania and New Jersey wetland and waterbody crossing tables in response to FERC's April 29, 2016 data request. The Excel versions of these tables are provided on the enclosed CD as Enclosure 5.

Table 2.5-1 Land Use Acreage Affected by Construction and Operation of Project Pipeline Facilities- DRB

7) **Please provide a similar land use breakdown for the other components of the project (access roads, pipeyards, staging areas, above ground facilities, Kidder compressor station, etc.).**

AECOM Response:
Table 2.5-1 has been expanded to include access roads, contractor yards, pipe yards, staging areas, and aboveground facilities within the Delaware River Basin. The updated table is provided on the enclosed CD as Enclosure 6.

8) **The table indicates that permanent impacts to forest and woodlands includes the full 50-foot permanent ROW, but actual maintained width will be 30 feet or 10 feet in forested wetlands. Please provide the actual acreage of existing upland forest and wetland forest (separate) that will be maintained during operation over the length of the pipeline and at the above ground facilities.**

AECOM Response:
A new table has been created to provide the acreage of existing upland forest and wetland forest that will be permanently impacted within the 30-foot wide maintained right of way (ROW) over the length of the pipeline in the Delaware River Basin. This information is provided on the enclosed CD as Enclosure 7.

Table 2.5-2 Land Requirements for Pipeline Facilities within the DRB

9) **Please provide a table that indicates the miles of pipeline co-located within or parallel to existing ROW's.**

AECOM Response:
Table 8.2-4, Co-locations of the Project Pipeline Facilities with Existing Right-of-Way, which PennEast submitted to the FERC in its February 22, 2016 response to FERC's February 10, 2016 data request, is provided on the enclosed CD as Enclosure 8. The table includes the beginning and ending mileposts, parallel length in miles, and the type of ROW.

10) **Please explain the difference between existing and partially existing Permanent Easement. Is the total permanent easement the sum of existing, partially existing and new?**
Existing permanent easement only includes existing third party easement overlapping proposed project permanent 50 foot ROW, within the limits of construction.

AECOM Response:
Existing easement refers to areas where the PennEast Pipeline easement is entirely within an existing third party easement (e.g., powerline, pipeline, or road right-of-way). A partially existing easement refers to areas where the PennEast Pipeline is only partially located with an existing easement. The total permanent easement is the sum of the existing, partial existing, and new permanent easements.

11) **Is the 370.8 acres of operational ROW just the area centered over the pipeline or does it include the land area necessary for the compressor station, other above ground facilities and permanent access roads?**

AECOM Response:
The 30-foot wide operational ROW is the area centered over the pipeline and does not include any overlap area with aboveground facilities or permanent access roads. Footnote 6 in the updated Table 2.5-2 (Enclosure 9 on the enclosed CD) has been revised to add clarity.

12) **Access Roads: Footnote 3 indicates that estimated temporary workspace for construction includes access roads (new and existing); however, the temporary workspace for construction of access roads is listed as zero (0). Permanent easement is listed as 90.3 acres. Please indicate if any of the access roads will be retained for permanent access to the project site.**

AECOM Response:
A breakdown of land requirements for the Project facilities (e.g., pipeline, access roads, pipeyards, above ground facilities, and staging areas) is provided in an updated Table 2.5-2 (Enclosure 9 on the enclosed CD). For access roads, the total workspace for construction is estimated as 90.3 acres, with approximately 85.5 acres being temporary workspace for construction and 4.9 acres being new permanent easement. (The numbers may not add up due to rounding.) Land requirements for other Project facilities can be found in the table.

13) **Please confirm my understanding that the 52.2 acres of above ground facilities are the portions of the facilities outside the construction workspace of the mainline and laterals. The portion of the facilities within the temporary or perm easement would be included in the pipeline totals.**

AECOM Response:
The workspace requirements for facilities total 52.2 acres, some of which lies within the temporary and permanent pipeline easement and some of which lies outside of the pipeline construction footprint; however, the portion of the aboveground facility workspace that overlaps with the temporary or permanent pipeline easement is not included in the pipeline acreage totals. Therefore the construction workspace requirements are additive and not double-counted.

Section 2.5.1

14) **A standard 100-foot wide construction ROW is proposed for the project. In wetland and waterbodies the construction ROW will be reduced to 75 feet unless a variance from FERC is requested. Please provide a table listing the locations where any variances were requested.**

AECOM Response:
The table provided on the enclosed CD as Enclosure 10 identifies where additional temporary workspace is required within a wetland or stream.

Table 2.5-3 Summary of Wetlands Affected by Construction and Operation of the Project within DRB

15) **The footnote indicates that access roads and the Kidder Compressor Station are included in the construction and operation acreage. Please indicate if the wetland acreages include potential disturbance at other off-ROW areas (pipeyards, staging areas, above ground facilities, etc.). If not, please provide.**

AECOM Response:
The Project will not result in temporary or permanent wetland impacts at pipeyards, staging areas, contractor yards, or aboveground facilities with the exception of the Kidder Compressor Station.

16) **The table submitted with the original application lists wetland acreage in the temporary workspace and in the permanent ROW. The table submitted with the April 1, 2016 supplemental information lists the wetland area affected during construction and wetland area affected during operation. Please confirm that the actual area affected during construction would be the sum of the two columns.**

AECOM Response:
The total acreage affected during construction includes both temporary workspace and permanent ROW. An updated Table 2.5-3 is provided on the enclosed CD as Enclosure 11. Table headings have been adjusted for clarity, and an additional footnote was added.

17) **Is the acreage of the wetland area affected during operation based on the 50-foot wide PE or the narrower maintained ROW? In wetlands, is this narrower maintained ROW 30 feet or 10 feet wide?**

AECOM Response:
The column heading in Table 2.5-3 has been revised to clarify that the wetland acreages presented represent impacts within the temporary workspace and the 50-foot wide permanent ROW. The two columns are additive, and the total wetland impacts are shown in a new column that has been added to the table. The Pennsylvania and New Jersey Wetland Impact tables (Enclosure 5) provide permanent wetland impacts associated with the conversion of palustrine forested (PFO) and palustrine scrub shrub (PSS) wetlands to palustrine emergent (PEM) wetlands within the 30-foot maintained ROW.

18) **The wetland total for Pennsylvania in Table 2.5-3 may include the acreage of wetlands in the Susquehanna River Basin. Please confirm.**

AECOM Response:
The wetland total for Pennsylvania in Table 2.5-3 does not include the acreage of wetlands in the Susquehanna River Basin. The wetlands that will be impacted in the Susquehanna River Basin between milepost 0.0 and 14.4 have not been included in this application. The updated Table 2.5-3 in Enclosure 11 corresponds with the updated wetland impacts tables provided in Enclosure 5.

Section 2.5.4.1

19) **Please clarify the pipeline's minimum installation depth below surface grade within upland areas, floodways and flood fringe at stream crossing locations. Bullet 2 indicates 3 feet below surface grade in floodways and Bullet 4 and elsewhere it is noted as minimums of 3 feet below surface grade in upland locations subject to flooding and 5 feet below surface grade at water body crossings.**

AECOM Response:
The pipeline will be installed with a minimum of 3-foot depth of cover. In actively cultivated agricultural lands, PennEast plans to install the pipeline with a minimum of 4 feet of cover, except where rock prevents this depth. At waterbody crossings where the pipeline is located directly under a stream channel, PennEast will increase the depth of cover to 5 feet to provide extra depth for potential scour and for additional overburden for negative buoyancy for the pipe. Therefore, the minimum depth of cover within a DRBC-defined floodway or flood fringe may vary from 3 to 5 feet, with a minimum of 3 feet of cover within the flood fringe and within the portion of the floodway that is outside of the stream channel, and a minimum of 5 feet of cover under the stream channel.

Table 2.5-4

20) **Please confirm that the 206 water body crossings include the crossings of pipeline, access roads, and crossings of the construction workspace where the pipeline does not cross the waterbody. I believe the sum of the PA mainline crossings should read 124.**

AECOM Response:
The sum of waterbody crossings on the PA mainline is 124. There are 215 total waterbody crossings. This includes waters crossed by access roads and waters that are within the construction workspace that are not crossed by the pipeline. A revised Table 2.5-4 is provided on the enclosed CD as Enclosure 12.

Section 3.0 Water Use

21) Please describe how the water will be transferred from the source to the vehicles, HDD equipment or natural gas pipeline. Are any land improvements planned due to the frequent trips back to the source to refill water trucks for dust control? Will the intake and pumping equipment be removed from the waterbody when not used or will it be left in place during the construction period?

AECOM Response:
The method of water transfer from the source to the pipeline will be dependent on the distance the pipeline is from the water source. The water may be transported via temporary conduit to the site or the water may be transported via truck. If trucks are utilized, water will transferred to the trucks via hose or other temporary conduit. It is anticipated that trucks will stay on established travel ways and suitable parking areas and that hoses will be run to the water sources; locations will be determined to minimize any land improvements. Intake and pumping equipment will be removed from the waterbody when not in use.

22) For each purchased water source, please provide the owner of the facility/water supply, a description of the facility and how water will be taken and delivered to the point of use.

AECOM Response:
A table that lists the owner of each proposed purchased water source, a description of the facility, and the anticipated delivery method is provided on the enclosed CD as Enclosure 13.

Tables 3.1-1 and -2

23) The table notes that the 31,500 gallons of water used to hydrostatically test the Kidder Compressor station will be hauled off site. If known, please indicate the location.

AECOM Response:
The hydrostatic test water from the Kidder Compressor Station will be hauled offsite and disposed of at an approved wastewater treatment facility within the Delaware River Basin. PennEast is currently evaluating disposal options within the Delaware River Basin.

3.2 HDD Activities

24) Are HDD figures showing entry and exit points and profiles available for the New Jersey HDD's?

AECOM Response:
The New Jersey HDD figures that were filed with the FERC on March 24, 2016 show the entry and exit points and profiles. These figures are provided on the enclosed CD as Enclosure 14.

25) Please provide the location of the HDD drilling mud disposal facilities if they have been identified.

AECOM Response:
The HDD drilling mud disposal facilities have not been identified at this time. PennEast will provide DRBC with the locations of the disposal facilities when the locations have been determined.

26) Please keep us updated on the potential I-80 HDD and the Alexauken Creek HDD discharge location.

AECOM Response:
The I-80 HDD concept has not been finalized; however, the Alexauken Creek is one of the New Jersey HDDs provided in the HDD figures (Enclosure 14). The HDD buoyancy control water may be discharged at the existing discharge location D15, which is located in close proximity to one of the HDD's entry and exit points. If the 1-80 HDD is implemented in the Project Design, PennEast will provide DRBC with a figure showing the entry and exit points and profile, as well as the discharge location of any HDD buoyancy control water.

Appendix B3

27) It does not appear that all of the waterbodies are shown on the Wetland Delineation Maps for the New Jersey portion of the project.

AECOM Response:
Updated Wetland Delineation Report Mapping for Pennsylvania and New Jersey is included on the enclosed CD as Enclosure 15.

Appendix D Wetlands crossed by the PennEast Project

28) The table refers to E&SC Plan alignment sheets. I located the E&SC Plan Alignment sheets that were included in the PA application data submitted to DRBC on April 1, 2016. Are E&SC Plan alignments available for the NJ portion of the project?

AECOM Response:
A site-specific E&SCP is currently being developed for the New Jersey portion of the Project. Upon completion of PennEast's New Jersey E&SCP, AECOM will provide an electronic copy to the DRBC. This E&SCP will be reviewed by county soil conservation districts during the permitting process. Alignment sheets that do not yet show erosion and sediment controls have been developed for the New Jersey portion of the Project, and they were filed with the FERC on May 16, 2016. Electronic copies of the alignment sheets are provided on the enclosed CD as Enclosure 3.

29) The tables appear to include all wetlands associated with the pipelines, laterals and compressor station and access roads. Please confirm no wetland disturbance at the aboveground facilities (off ROW), staging areas and pipeyards?

AECOM Response:
The Project will not result in temporary or permanent wetland impacts at pipeyards, staging areas, contractor yards, or aboveground facilities with the exception of the Kidder Compressor Station.

30) Several columns of information presented in the Pennsylvania wetland tables are not included in the NJ wetland tables. Please provide the wetland cover type and square footage of perm conversion PFO&PSS within the 30 foot maintained ROW information. Also, please indicate if the maintained ROW width is 10 feet or 30 feet.

AECOM Response:
The Pennsylvania wetland and waterbody tables submitted in the February 5, 2016 application included several columns of data that were presented to the Pennsylvania Department of Environmental Protection and US Army Corps of Engineers in the Joint Permit Applications. To facilitate a more unified dataset, PennEast is resubmitting the Pennsylvania and New Jersey wetland and waterbody tables. These tables are consistent with those submitted to the FERC in May 2016, but have been pared down to only show wetland and waterbody impacts within the Delaware River Basin, and have been modified to show the square footage of permanent conversion of palustrine forested and palustrine scrub shrub wetlands within the 30-foot maintained ROW. Although only 10 feet of the 30-foot maintained ROW will be regularly mowed, PennEast will selectively cut woody vegetation within 15 feet of the pipeline (a 30-foot ROW) so that roots do not damage the protective pipeline coating. The updated tables are provided on the enclosed CD as Enclosure 16.

Appendix E

31) PA Table: Crossing Width foot note No. 13 indicates that this number is not equal to the width of the stream. Please explain.

AECOM Response:
Footnote 13 indicates that in some instances the crossing width listed may be longer than the bank-to-bank width of the stream if the pipeline is crossing the waterbody at an angle other than perpendicular to the streamline. The crossing width may be longer, but will not be shorter, than the actual bank-to-bank width.

FEMA Floodplain Map

32) I compared the map to FEMA's National Flood Hazard Layer. The FEMA mapping shows 100-year floodplains surrounding Indian Creek (MP 54.3), UNT Hokendauqua Creek (MP 56.7), UNT Lehigh River (MP 70.4) and Bull Run (HL 0.3). Please confirm and update any information as necessary.

AECOM

AECOM Response:
The FEMA floodplain mapbook has been updated, and 100-year floodplains are shown surrounding Indian Creek (MP 54.3), UNT Hokendauqua Creek (MP 56.7), UNT Lehigh River (MP 70.4) and Bull Run (HL 0.3). The updated mapbook is provided on the enclosed CD as Enclosure 4.

Thank you for your time and effort in reviewing this application. Please feel free to contact me at (610) 832-2713 or sarah.binckley@aecom.com if you need any additional information.

Sincerely,

AECOM

Sarah K. Binckley

Sarah K. Binckley
Biologist

cc: Tony Cox, PennEast Pipeline Company LLC

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October 31, 2016

Eric Engle
Project Reviewer
Delaware River Basin Commission
25 State Police Drive
West Trenton, New Jersey 08628

Re: PennEast Pipeline Company, LLC.
PennEast Pipeline Project
Delaware River Basin Commission Application – Supplemental Information

Dear Mr. Engle:

On behalf of PennEast Pipeline Company, LLC (PennEast), AECOM has prepared the enclosed supplemental information package for the PennEast Pipeline Project water withdrawal and discharge application that was submitted on February 5, 2016. This supplemental information package includes tables and figures that have been updated to reflect route changes that PennEast filed with the Federal Energy Regulatory Commission (FERC) on September 23, 2016. The first table in the package lists each February 5, 2016 application component , provides the last date each component was provided to the DRBC, and states whether or not the route changes resulted in a need to update the table or figure. We have also updated tables that were provided in PennEast's July 22, 2016 response to DRBC comments. The updated tables and figures are presented in the order outlined on the summary table. Please find enclosed one hardcopy and one electronic copy of the supplemental information package for your review.

Thank you for your time and effort in reviewing this application. Please feel free to contact me at (610) 832-2713 or sarah.binckley@aecom.com if you need any additional information.

Sincerely,

AECOM CORPORATION

Sarah K. Binckley

Sarah Binckley, PWS
Biologist

cc: Tony Cox, PennEast Pipeline Company LLC

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May 5, 2017

Eric Engle
Project Reviewer
Delaware River Basin Commission
25 State Police Drive
West Trenton, New Jersey 08628

Re: PennEast Pipeline Company, LLC.
PennEast Pipeline Project
Delaware River Basin Commission Application – Supplemental Information

Dear Mr. Engle:

On behalf of PennEast Pipeline Company, LLC (PennEast), AECOM has prepared the enclosed supplemental information package for the PennEast Pipeline Project (Project) water withdrawal and discharge application that was submitted on February 5, 2016. This supplemental information package includes updated water withdrawal and discharge tables and figures and a narrative that describes water withdrawal plans for each of the sources as discussed during the April 18, 2017 site visit. Please find enclosed one hardcopy and one electronic copy of the supplemental information package for your review.

The information PennEast has provided to the Delaware River Basin Commission (DRBC) represent PennEast's preferred withdrawal and discharge plans; however, several factors could influence the execution of those plans. These factors include the construction schedule, climatic conditions at the time of withdrawals or discharges, continuing negotiations with water suppliers, and coordination with other permitting agencies such as the Pennsylvania Department of Environmental Protection and the New Jersey Department of Environmental Protection. To allow flexibility to address these potential changes, PennEast respectfully requests that the DRBC incorporate the following conditions in the docket:

- In the event that an alternative water source that has an existing, approved DRBC docket is identified before construction, and using that source would minimize impacts to the environment or the surrounding communities, PennEast would like the opportunity propose alternate water sources for Executive Director approval. Any alternate sources must have sufficient allocation to meet the docket holders' needs and provide water for the Project without exceeding its maximum allocation or instantaneous withdrawal rates.
- In instances where PennEast proposes to purchase water from sources with existing dockets (i.e. Big Boulder Ski Resort, Jack Frost Ski Resort, and Blue Mountain Ski Resort), PennEast may use the docket holder's existing water withdrawal equipment or may set up its own water withdrawal system provided that all water usage is metered and the total amount withdrawn does not exceed the docket holder's permitted allocation or withdrawal rates.

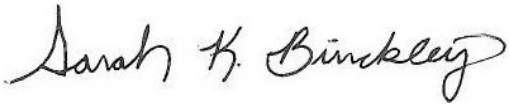
- PennEast may propose alternate hydrostatic test discharge locations, which are subject to state regulations and permit requirements.
- PennEast may haul water used for horizontal directional drilling or hydrostatic test water to a water treatment facility for disposal, provided that there is no inter-basin transfer of water.

As previously discussed, ongoing environmental surveys, negotiations with landowners/land managers, and federal and state permitting will affect the impact acreages impact acreages for wetlands, waterways, floodplains, forests, and DRBC Reservoirs and Recreation Areas that PennEast has submitted to the DRBC. PennEast also requests that the DRBC allows Executive Director approval of these changes, which would be submitted in advance of construction.

Thank you for your time and effort in reviewing this application. Please feel free to contact me at (610) 832-2713 or sarah.binckley@aecom.com if you need any additional information.

Sincerely,

AECOM CORPORATION



Sarah Binckley, PWS
Biologist

cc: Jeff England, PennEast Pipeline Company LLC

Enclosures:

1. Supplemental Information Memorandum
2. Updated Table 3.1-1 - *Water Withdrawal and Discharge Locations for Construction Activities Associated with the PennEast Project*
3. Updated Table 3.1-2: *Summary of Water Use Needs for the PennEast Project*
4. Updated Appendix B5: *Proposed Water Withdrawal and Discharge Location Map*
5. New table: *Delaware River Basin Water Source Withdrawal and Delivery Methods*

Pennsylvania State Historic Preservation Office

August 20, 2014

Mr. Douglas McLearen, Chief
Division of Archaeology and Protection
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: PennEast Pipeline Company, LLC - PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Buck Counties, Pennsylvania.

Dear Mr. McLearen:

The PennEast Pipeline Company, LLC (PennEast) is a partnership with UGI Energy Services (UGIES), AGL Resources, NJR Pipeline Company, and South Jersey Industries. On behalf of PennEast, URS Corporation (URS) is initiating cultural resource consultation for the proposed PennEast Pipeline Project. The PennEast Pipeline Project (Project) proposes to construct a new 100-mile, 30-inch pipeline to deliver natural gas from northeast Pennsylvania to other markets in Pennsylvania and New Jersey. This document describes the proposed undertaking for the project as it is understood at this time, as well as our proposed protocol for cultural resource investigations. The lead agency for this project is the Federal Energy Regulatory Commission (FERC). We are requesting the Pennsylvania Historical and Museum Commission's (PHMC) review of URS's plans to identify cultural resources that may be affected by the project.

Description of the Undertaking

The PennEast Pipeline Project is designed to transport natural gas from Luzerne County, Pennsylvania to the Transco Trenton-Woodbury interconnect in Mercer County, New Jersey. The Project will include construction of approximately 100 miles of new 30-inch pipeline, three compressor stations, and three taps/interconnects. In Pennsylvania, the Project will extend approximately 72 miles from UGI Energy Services' (UGIES) compressor station in Luzerne County to the Delaware River in Bucks County. A series of USGS-based maps depicting the approximate location of the project is included with this letter (Attachment A).

As part of the pipeline route evaluation process, PennEast has undertaken a thorough Critical Issues Assessment (CIA). The CIA initially focused on the identification of a series of corridors to determine which were most feasible from an environmental and engineering perspective. The selected route corridor was then analyzed using federal, state and regional databases to map out resources in proximity to the corridor. Once this mapping was completed, the route was sequentially evaluated along its entirety, and the centerline adjusted to avoid and/or minimize impacts to resource areas.

The following discussion outlines the results of background research conducted to date, as well as a proposed methodology for identification of archaeological and above-ground resources within the Area of Potential Effects (APE). The APE for direct effects includes all currently known areas of potential project-related ground disturbance. The APE for visual effects includes locations from which elements of the pipeline project may be visible, including potential changes to the landscape. The study corridor for cultural resource surveys is 400 feet wide. Within that 400-foot corridor, the pipeline will be constructed within a right-of-way (ROW) of approximately 100 feet encompassing both temporary and permanent ROW. The study corridor is wider than the disturbance area to allow for minor alignment shifts to avoid any sensitive resources that may be identified during the environmental field investigations.

Background Research

URS consulted the files of the PHMC in July 2014 in an effort to determine the extent of previous cultural resource surveys in the vicinity of the project alignment, and to assess the density of inventoried cultural resources in the region. The PHMC's online Cultural Resource Geographic Information System (CRGIS) system was consulted to gather locational and other data on previously recorded archaeological sites, architectural resources, and cultural resource surveys as maintained in the Pennsylvania Archaeological Site Survey (PASS) files and the Historic Resource Inventory (HRI). A one-mile study area on either side of the proposed centerline was used to identify an adequate sample of previously recorded sites from which to derive information regarding the expected types and settings of sites in the vicinity of the project. A one-quarter-mile study area on either side of the proposed centerline was used to identify architectural resources

Background research identified 98 PASS-inventoried archaeological sites within the one-mile study area. Seven archaeological sites are mapped partly or wholly within the 400-foot study corridor: 36LU149, 36LU150, 36NM75, 36NM76, 36NM180, 36BU119, and 36BU123. None of these sites have been evaluated for listing on the National Register of Historic Places (NRHP). Twenty-three architectural resources are located within the one-quarter-mile study area. Further discussion of archaeological and architectural resources is provided in the sections below. The locations of archaeological sites and architectural resources are depicted in Attachments B and C, respectively.

Previous Cultural Resources Surveys

Archaeological investigations associated with 32 projects have been conducted within one mile of the study corridor. These investigations ranged from a few acres for small commercial developments to longer linear surveys for pipelines and highways. Although the majority of these investigations were Phase I identification-level surveys, several Phase II site evaluations and two data recovery excavations have also been conducted. Archaeological sites encountered by these surveys have primarily been prehistoric Native American sites that ranged from briefly occupied surface sites to longer-term camps in stratified contexts. The results of these investigations and others in the Susquehanna River and Delaware River drainages will be used to

develop contexts for the evaluation of the potential NRHP-eligibility of sites identified in the Phase I archaeological investigation for the current project. In addition, many of the Phase I and II surveys have included geomorphological investigations on alluvial landforms of streams and rivers crossed by the current project, which will permit an informed approach to the identification of archaeological sites in these settings.

Previously Recorded Archaeological Sites

Ninety-eight previously recorded archaeological sites were identified within one mile of the proposed centerline and are presented in Table 1. General site characteristics are summarized, including site type, temporal component, landform setting, and approximate lateral distance to the current study corridor. The NRHP eligibility status for each of these sites as recorded in the CRGIS is listed in the table below as either: Undetermined (U), Not Eligible (NE), Eligible (E), or Listed (L). Sites within the 400-foot study corridor are listed in the table below as SC; those outside of the study corridor but within the one-mile study area are listed SA.

Seven of the 98 recorded archaeological sites are located either partially or wholly within the 400-foot study corridor. Sites 36LU0149 and 36LU0150 intersect the study corridor at Milepost [redacted] and [redacted], respectively. Site 36LU0149 is a nineteenth-century farmstead, and site 36LU0150 is a nineteenth-century wooden dam. The NRHP status of these sites is undetermined. Site 36NM0075 is located on a slope overlooking the Lehigh River at Milepost [redacted]. The site is a prehistoric Native American site of unknown temporal affiliation; its NRHP status is undetermined. Site 36NM0076, a Native American site dated to the Late and Terminal Archaic, is located on a slope above a Lehigh River tributary and intersects the study corridors at Milepost [redacted]. The NRHP eligibility of this site is undetermined. Site 36NM0180 is a nineteenth-century domestic site located on a hilltop at Milepost [redacted]. Its NRHP status has not been determined. Site 36BU0119 is a temporally undefined Native American site located on a terrace of the Delaware River at Milepost [redacted]. Its NRHP status is undetermined; however the CRGIS record indicates that hearth features have been identified at the site. Site 36BU0123 is a temporally undefined Native American site located on a hilltop at Milepost [redacted]; its NRHP status is undetermined.

Ninety-one of the 98 recorded archaeological sites are located outside of the 400-foot study corridor, but within one-quarter-mile of the proposed centerline. The majority of these sites (62) are prehistoric Native American sites ranging from Paleoindian through Late Woodland in age. Twenty-three are historic Euro-American sites dating from the late eighteenth century through the early twentieth century. Six sites have both historic and prehistoric components. One site (36LU0181) is NRHP-listed, four sites (36NM0116, 36NM0117, 36BU0001, 36BU0005) are NRHP-eligible, and five sites (36LU0125, 36LU0305, 36NM0175, 36NM0176, 36NM0160) have been determined not eligible for listing on the NRHP. The NRHP status of the remaining 88 sites is undetermined.

Table 1: Previously Recorded Archaeological Sites Within One Mile of the Study Corridor

Site ID	Type	Temporal Component	Setting	NRHP Status	Relationship to Study Corridor
36LU0005	Open Habitation	Prehistoric: Archaic, Woodland	Hillslope	U	SA (MP [redacted])
36LU0006	Rockshelter/Cave	Prehistoric: Late, Terminal Archaic, Early through Late Woodland	Hillslope	U	SA (MP [redacted])
36LU0030	Rockshelter/Cave	Prehistoric: Early and Late Woodland	Hilltop	U	SA (MP [redacted])
36LU0044	Open Habitation	Prehistoric: Archaic, Middle and Early Woodland	Floodplain	U	SA (MP [redacted])
36LU0045	Open Habitation	Prehistoric: No data	Floodplain	U	SA (MP [redacted])
36LU0047	Open Habitation	Prehistoric: Late Archaic	Floodplain	U	SA (MP [redacted])
36LU0065	Rockshelter/Cave	Prehistoric Woodland	Hillslope	U	SA (MP [redacted])
36LU0082	Open Habitation	Prehistoric: Archaic, Woodland	Floodplain	U	SA (MP [redacted])
36LU0088	Open Habitation	Prehistoric: No data	Stream bench	U	SA (MP [redacted])
36LU0103	Rockshelter/Cave	Prehistoric: No data	Hillslope	U	SA (MP [redacted])
36LU0110	Open Habitation	Prehistoric Archaic, Late Woodland	Floodplain	U	SA (MP [redacted])
36LU0121	No data	Prehistoric: No data Historic: No data	Floodplain	U	SA (MP [redacted])
36LU0124	No data	Historic: No data	Floodplain	U	SA (MP [redacted])
36LU0125	Unknown	Prehistoric: Late Archaic, Late Woodland	Stream bench	NE	SA (MP [redacted])
36LU0127	Domestic	Historic: Mid-19th c.	Floodplain	U	SA (MP [redacted])
36LU0149	Domestic	Historic: 19th c.	Floodplain	U	SC (MP [redacted])
36LU0150	Industrial	Historic: 19th c.	Upland Flat	U	SC (MP [redacted])
36LU0155	Unknown	Historic: Early 20th c.	Upland Flat	U	SA (MP [redacted])
36LU0181	Domestic	Historic: Late 18th to mid-19th c.	Floodplain	L	SA (MP [redacted])
36LU0305	Unknown surface scatter	Prehistoric: No data	Terrace	NE	SA (MP [redacted])
36CR0026	Open Habitation	Prehistoric: No data	Floodplain	U	SA (MP [redacted])
36CR0027	Open Habitation	Prehistoric: Late Archaic	Floodplain	U	SA (MP [redacted])
36CR0029	Open Habitation	Prehistoric: No data	Floodplain	U	SA (MP [redacted])
36CR0058	Open Habitation	Prehistoric: Late Archaic	Hill Ridge/Toe	U	SA (MP [redacted])
36CR0059	Industrial	Historic: No data	Hillslope	U	SA (MP [redacted])

Table 1: Previously Recorded Archaeological Sites Within One Mile of the Study Corridor

Site ID	Type	Temporal Component	Setting	NRHP Status	Relationship to Study Corridor
36CR0060	Domestic	Historic: No data	Hillslope	U	SA (MP [redacted])
36CR0061	Open Habitation	Prehistoric: No data	Hillslope	U	SA (MP [redacted])
36CR0083	Open Habitation	Prehistoric: Early Archaic through Late Woodland	Floodplain	U	SA (MP [redacted])
36CR0098	No data	Historic: 19th through Early 20th c.	Lower slopes	U	SA (MP [redacted])
36CR0099	Lithic Reduction	Prehistoric: Late and Terminal Archaic, Late Woodland	Terrace	U	SA (MP [redacted])
36CR0100	Lithic Reduction	Prehistoric: Archaic, Woodland	Stream bench	U	SA (MP [redacted])
36CR0102	Lithic Reduction	Prehistoric: Middle and Late Archaic	Floodplain	U	SA (MP [redacted])
36CR0146	Industrial	Historic: No data	Middle slopes	U	SA (MP [redacted])
36NM0050	Open Habitation	Prehistoric: Late and Terminal Archaic	Stream bench	U	SA (MP [redacted])
36NM0071	Open Habitation	Prehistoric: Late Archaic	Floodplain	U	SA (MP [redacted])
36NM0075	Open Habitation	Prehistoric: No data	Hillslope	U	SC (MP [redacted])
36NM0076	Open Habitation	Prehistoric: Late and Terminal Archaic	Hillslope	U	SC (MP [redacted])
36NM0086	Open Habitation	Prehistoric: Terminal Archaic	Hillslope	U	SA (MP [redacted])
36NM0088	Open Habitation	Prehistoric: Late Archaic through Early Woodland, Late Woodland	Hillslope	U	SA (MP [redacted])
36NM0089	Open Habitation	Prehistoric: Late Archaic	Saddle	U	SA (MP [redacted])
36NM0090	Open Habitation	Prehistoric: No data	Hillslope	U	SA (MP [redacted])
36NM0115	Open Habitation	Prehistoric: No data	Floodplain	U	SA (MP [redacted])
36NM0116	Quarry	Prehistoric: No data	Hillslope	E	SA (MP [redacted])
36NM0117	Open Habitation	Prehistoric: Late and Terminal Archaic	Hillslope	E	SA (MP [redacted])
36NM0135	Domestic	Historic: No data	Hillslope	U	SA (MP [redacted])
36NM0136	Commercial	Historic: No data	Hillslope	U	SA (MP [redacted])
36NM0137	Industrial	Historic: No data	Hillslope	U	SA (MP [redacted])
36NM0138	Lithic Reduction	Prehistoric: Late Archaic through Early Woodland, Late Woodland	Stream bench	U	SA (MP [redacted])
36NM0140	Open Habitation	Prehistoric: Late Archaic, Late Woodland	Floodplain	U	SA (MP [redacted])
36NM0143	Open Habitation	Prehistoric: Late Archaic, Early Woodland	Stream bench	U	SA (MP [redacted])

Table 1: Previously Recorded Archaeological Sites Within One Mile of the Study Corridor

Site ID	Type	Temporal Component	Setting	NRHP Status	Relationship to Study Corridor
36NM0156	Historic and Prehistoric	Prehistoric: No data Historic: No data	Hillslope	U	SA (MP [redacted])
36NM0157	Lithic Reduction	Prehistoric: No data	Hillslope	U	SA (MP [redacted])
36NM0158	Lithic Reduction	Prehistoric: No data	Hillslope	U	SA (MP [redacted])
36NM0159	Lithic Reduction	Prehistoric: Late Archaic	Hillslope	U	SA (MP [redacted])
36NM0160	Industrial	Historic: 19th c.	Hillslope	NE	SA (MP [redacted])
36NM0161	Domestic	Historic: 19th c.	Upland flat	U	SA (MP [redacted])
36NM0162	Lithic Reduction	Prehistoric: No data	Stream bench	U	SA (MP [redacted])
36NM0164	Lithic Reduction	Prehistoric: No data	Stream bench	U	SA (MP [redacted])
36NM0175	Historic and Prehistoric	Prehistoric: No data Historic: No data	Floodplain	NE	SA (MP [redacted])
36NM0176	Historic and Prehistoric	Prehistoric: No data Historic: No data	Floodplain	NE	SA (MP [redacted])
36NM0180	Domestic	Historic: 19th c.	Hilltop	U	SC (MP [redacted])
36NM0182	Domestic	Historic: 20th c.	Lower slopes	U	SA (MP [redacted])
36NM0184	Historic and Prehistoric	Prehistoric:Early, Middle and Terminal Archaic, Early and Late Woodland Historic: 19th c.	Floodplain	U	SA (MP [redacted])
36NM0185	Industrial	Historic: 19th and Early 20th c.	Hillslope	U	SA (MP [redacted])
36NM0188	Domestic	Historic: No data	Lower slopes	U	SA (MP [redacted])
36NM0189	Domestic	Historic: 19th c.	Lower slopes	U	SA (MP [redacted])
36NM0190	Domestic	Historic: 19th c.	Stream bench	U	SA (MP [redacted])
36NM0215	Lithic Reduction	Prehistoric: No data	Lower slopes	U	SA (MP [redacted])
36NM0216	Domestic	Historic: 19th c.	Lower slopes	U	SA (MP [redacted])
36NM0217	Lithic Reduction	Prehistoric: No data	Lower slopes	U	SA (MP [redacted])
36NM0218	Lithic Reduction	Prehistoric: No data	Lower slopes	U	SA (MP [redacted])
36NM0219	Domestic	Historic: 19th c.	Lower slopes	U	SA (MP [redacted])
36NM0221	Open Habitation	Prehistoric: No data	Lower slopes	U	SA (MP [redacted])

Table 1: Previously Recorded Archaeological Sites Within One Mile of the Study Corridor

Site ID	Type	Temporal Component	Setting	NRHP Status	Relationship to Study Corridor
36NM0291	Open Habitation	Prehistoric: Middle Archaic through Early Woodland	Floodplain	U	SA (MP [redacted])
36NM0294	Open Habitation	Prehistoric: No data	Floodplain	U	SA (MP [redacted])
36NM0301	Open Habitation	Prehistoric: Middle Archaic through Early Woodland	Upland flat	U	SA (MP [redacted])
FortNM01	Military	Historic: 18th c.	Lower slopes	U	SA (MP [redacted])
36BU0001	Open Habitation	Prehistoric: Late Woodland	Terrace	E	SA (MP [redacted])
36BU0004	Open Habitation	Prehistoric: Archaic	Floodplain	U	SA (MP [redacted])
36BU0005	Village	Prehistoric: Early and Late Woodland	Terrace	E	SA (MP [redacted])
36BU0026	Quarry	Prehistoric: No data	Upper Slopes	U	SA (MP [redacted])
36BU0112	No data	Prehistoric: No data	Terrace	U	SA (MP [redacted])
36BU0113	No data	Prehistoric: No data	Terrace	U	SA (MP [redacted])
36BU0114	No data	Prehistoric: No data	Saddle	U	SA (MP [redacted])
36BU0115	No data	Prehistoric: No data	Terrace	U	SA (MP [redacted])
36BU0118	Village	Prehistoric: Early and Late Woodland	Floodplain	U	SA (MP [redacted])
36BU0119	No data	Prehistoric: No data	Terrace	U	SC (MP [redacted])
36BU0120	No data	Prehistoric: No data	Terrace	U	SA (MP [redacted])
36BU0121	No data	Prehistoric: No data	Floodplain	U	SA (MP [redacted])
36BU0122	No data	Prehistoric: No data	Terrace	U	SA (MP [redacted])
36BU0123	No data	Prehistoric: No data	Hilltop	U	SC (MP [redacted])
36BU0196	Rockshelter/Cave	Prehistoric: Early and Middle Archaic	Hillslope	U	SA (MP [redacted])
36BU0217	Open Habitation	Prehistoric: Paleoindian	Upper slopes	U	SA (MP [redacted])
36BU0263	Open Habitation	Prehistoric: No data	Floodplain	U	SA (MP [redacted])
36BU0315	Village	Prehistoric: Early and Late Woodland	Floodplain	U	SA (MP [redacted])
36BU0403	Historic and Prehistoric	Historic: 19th c. Prehistoric: Woodland	Floodplain	U	SA (MP [redacted])
36BU0404	Domestic	Historic: 19th c.	Terrace	U	SA (MP [redacted])
36BU0411	Commercial	Historic: 19th c.	Floodplain	U	SA (MP [redacted])

Previously Recorded Above-Ground Resources

The CRGIS research conducted for this project identified a total of 23 previously identified resources located within the one-quarter-mile study area. There are ten National Register listed and eligible resources identified in the study area, including two National Register-eligible districts, five National Register-eligible buildings, one National Register listed object, and two National Register-Listed buildings (Table 2). National Register eligibility has not been determined for eight of the 23 inventoried historic architectural resources within one-quarter-mile of the study corridor (Table 3). In addition, there are five aggregate file resources extending across multiple counties that are not listed in Tables 2 and 3: Lehigh Valley Railroad (BHP Key #156109), Lehigh Valley Railroad (BHP Key # 126031), Lehigh & New England Railroad (BHP Key #156534), Lehigh & New England Railroad (BHP Key # 156534) and the Central Railroad of New Jersey (BHP Key #155754). Tables 2 and 3 list these historic architecture resources in addition to information specific to their location and NRHP status.

Table 2: NRHP Listed and Eligible Above-Ground Resources within 1/4 Mile of the Study Corridor

BHP Key #	Municipality	County	Resource Name	NR Status	Resource Type
000731	Wyoming Borough	Luzerne	Swetland Mansion	Listed	Building
115265	Wyoming Borough	Luzerne	Wyoming Monument	Listed	Object
144291	Lower Towamensing/ Moore Twps.	Carbon/ Northampton	Appalachian Trail	SHPO: Eligible	District
157176	Moore Twp.	Northampton	Fehnel Farm	SHPO: Eligible	Building
096309	Bethlehem Twp.	Northampton	Hopeville Historic District	SHPO: Eligible	District
096308	Lower Saucon Twp.	Northampton	Redington Steel Works: Proving Grounds	SHPO: Eligible	Building
086688	Lower Saucon Twp.	Northampton	Site No. 3: Farmhouse, Barn, & Outbuildings	SHPO: Eligible	Building
096307	Lower Saucon Twp.	Northampton	Oberly, Anthony, Farm: Baker Farm	SHPO: Eligible	Building
143013	Lower Saucon Twp.	Northampton	Christman Farm; Pichel Farm	SHPO: Eligible	Building
123914	Williams Township	Northampton County	Stout, Issac, House	Listed	Building

Table 3: Previously Identified Undetermined Above-Ground Resources within 1/4 Mile of the Study Corridor

BHP Key #	Municipality	County	Resource Name	Resource Type
86551	Wyoming Borough	Luzerne	Crawford House	Building
097158	Jenkins Township	Luzerne	Blanchard, Jeremiah, House	Building
101075	Bethlehem Township	Northampton	Walter Farm	District
086674	Lower Saucon Township	Northampton	Limekiln	Structure
098081	Durham Township	Bucks	1215 County Line	Building
156670	Dallas Township	Luzerne	Hildebrandt Farmstead	Building
126031	Jenkins Township	Luzerne	Port Blanchard Village	District
155212	Bethlehem Township	Northampton	Emrick, George, Farm; Riverside Campus West	Building

Historic Mapping Data

The proposed pipeline route was overlaid on nineteenth century maps and atlases of each of the counties crossed by the project (e.g.. Beers 18736 *Atlas of Luzerne County, Pennsylvania*). These sources show a number of structures near the study corridor which may now represent historic archaeological sites. As project research is further developed, URS will assess which, if any, of these map-documented structures have the potential to be directly or indirectly impacted by the project.

Preliminary Geomorphological Assessment

In consultation with Dr. Frank Vento, Geomorphologist, stream order was used to initially assess the potential for buried archaeological sites at each of the stream crossings and areas where the study corridor intersects potential alluvial soils. Stream crossings with moderate to high potential for buried, intact archaeological sites are listed in Table 4 from north to south along the proposed pipeline.

Table 4: Geomorphological Assessment of the Proposed Alignment

Stream Name	Stream Order	Potential for Site Burial	Milepost
Susquehanna River	4th	High	[redacted]
Lehigh River	3rd	Moderate	[redacted]
Pohopoco Creek	3rd	Moderate	[redacted]
Aquashicola Creek	3rd	Moderate	[redacted]
Lehigh River	4th	High	[redacted]
Delaware River	4th	High	[redacted]

The majority of crossings will be made through small rills, as well as first- and second-order streams. These streams typically exhibit moderate to steep gradients, straight to weak meandering channel habits, low discharges and relatively thin (less than 3.3 feet) Holocene vertical accretion deposits. As a result they possess valley bottom zones which lack flights of terraces above the aggrading flood plain zone. The potential for site burial is assessed as low. Third- and fourth-order streams generally display lower gradients, higher discharges, and wider valley bottom zones. Many possess a weak to well-developed meandering channel habit and higher terraces. The profiles have the potential to contain multiple stacked solas along the lower aggrading terraces with single well-developed pedons occurring on the higher terraces well above the 100-year floodway zone. Holocene alluvial packages are anticipated to range between 3.3 feet. and 14 feet. in thickness. These streams are assessed as having a medium to high potential for buried archaeological sites.

Archaeological Sensitivity Model

The archaeological sensitivity model created for the project is a simple weighted combination of environmental features including topographic slope and the distance to wetlands, streams, water bodies, and the Lockatong geologic formation. The objective of this model is to identify areas that are within proximity to valuable hydrologic resources and on soils suitable for habitation. In addition, the Lockatong geologic formation was factored into this model to account for the potential presence of Native American argillite quarry sites that may not be accounted for by topography and hydrology alone. By weighing each factor individually, the model is able to not only identify they suitability of single attributes as well as the combination of attributes. The theoretical underpinning of this model is simply that suitable ground and access to water are the most basic factors for habitation choices. Referred to as a "Camping model," this approach mirrors how archaeologists have been locating sites for decades, but uses the availability of digital data to apply it over a large area. Clearly, there are many potential habitation locations that such a model will not identify, but this model is intended primarily as a guide to the field effort and does not replace in-field decisions for locating judgmental test locations, which are equally, if not more, important.

The assignment of weights to the classification environmental variables allows the archaeologist to rank the importance of certain measures. There are various ways to weight a model factor, which include arbitrary assessment, inductive assessment based on known site locations, deductive assessments based on an a priori theory, or a combination of these. This model uses the theory that lower slopes and proximity to the Lockatong formation and water resources have a large influence on the location of most Native American archaeological sites. As such, each of the variables is weighted so that the more level or closer to a water resource or argillite-bearing geology an area is the greater the sensitivity for Native American archaeological sites. To create the weights, layers were created in a GIS to represent the topographic slope (percent), distance to the Lockatong bedrock geology formation, streams from the National Hydrologic Dataset (high resolution), and the wetlands and water bodies of the National Wetland Database and assigned weights from 10 to 1 based on a preference for lower slopes and proximity to water. Following

this, the weights of slope and distance to the Lockatong formation were added to the hydrologic resources to create the final set of weights. The final model had a range of weights from 2.5 to 41.

To create the thresholds of high, moderate, and low sensitivity, the weights were divided based on the percent of known sites located within each weight class and the amount of area that class occupied in the study area. The intention of this is to balance an acceptably high correct classification rate for known sites while at the same time not diluting the survey efficiency. The final classification of high and moderate sensitivity accounts for 70 percent of the known archaeological sites within a two-mile study area for the length of the project. Eighteen percent of the sites are located within low sensitivity areas and 12 percent within slopes greater than 15 percent. Given the high degree of variability for archaeological site location and environmental variation, this model will assist in targeting field work by correctly identifying the location of a large percent of known sites. Clearly, no single model can account for the full range of Native American habitation location decisions; therefore this model is simply a guide for the field effort. The true assessment of sensitivity will take place within the field where field directors can use on-the-ground observations to modify the model's recommendations and set the testing interval accordingly.

Proposed Methodology for Field Survey

Archaeological Resources

Methods for the identification of archaeological sites will be consistent with the PHMC's guidelines: *Cultural Resource Management in Pennsylvania: Guidelines for Archaeological Investigations* (2008). The 400-foot study corridor will be visually inspected to identify rockshelters, foundations, or other surface indications of archaeological sites regardless of field conditions (i.e. in areas of excessive slope, standing water). Based on the archaeological sensitivity model, previous archaeological surveys, and accepted practice, relatively level landforms within approximately 300 feet of perennial water sources and similar settings adjacent to previously-recorded archaeological sites are categorized as having a high probability for the presence of archaeological sites. In addition, areas in proximity to historic roads and structure locations indicated on historic maps are also categorized as high probability areas. Areas of moderate probability encompass level to gently sloping landforms between approximately 300 and 600 feet from a perennial water source. Areas with a low probability to contain archaeological sites include areas of steeper slope (≥ 12 percent) and areas at more than 600 feet distant from perennial water sources.

Geomorphological investigations will be conducted at stream crossings within the 400-foot study corridor that may contain buried archaeological sites. These investigations will be carried out in the early stages of Phase I archaeological fieldwork and will guide the methods used to identify archaeological sites.

Subsurface testing in high probability areas will be accomplished by shovel test pits (STPs) excavated at 15-meter intervals on landforms where archaeological sites can be demonstrated to occur within one meter of the surface. In high probability areas where archaeological sites may be present below one meter, test units (TUs) measuring one-meter-square or larger will be excavated at 30-meter intervals. Subsurface testing in medium probability areas will be conducted by STPs at 30-meter intervals, with closer-interval STPs excavated on a judgmental basis. STPs in low sensitivity areas will be excavated on a judgmental based (i.e. near locally prominent landforms, chert outcrops).

In portions of the study corridor where soil visibility is greater than 70 percent (except in areas of no-till agriculture), systematic inspection of the surface for artifacts will be conducted along transects spaced at 3.0-meter intervals in high probability areas. Surface survey transects in areas of medium and low probability will be spaced at 6.0-meter intervals. In general, subsurface testing will not be conducted on excessive slopes (≥ 15 percent slope) or in areas of standing water. As noted above, these settings will be visually inspected for the presence of rockshelters, lithic sources, and structural remnants. If evidence of these features is identified in areas of excessive slope or standing water, subsurface testing will be conducted on a judgmental basis.

All soils from STPs and TUs will be excavated by natural horizons. Soils from each horizon will be screened separately through one-quarter-inch wire mesh. Data from STPs and TUs will be recorded on standardized forms. Soil profiles will be recorded using the Munsell color system and standard texture classifications. Excavations will be completely backfilled, compacted, and the sod replaced. The location of survey transect beginning and end points, STPs, TUs, surface artifacts, and features will be mapped with a hand-held Global Positioning System (GPS) unit with sub-meter accuracy. Digital photography will be used to record surface conditions, select excavation profiles, cultural features, and identified archaeological sites.

Above-ground Resources

There is potential for the PennEast pipeline to cross through parcels containing above-ground resources, including agricultural buildings and landscape features that are fifty years of age or older. Parcels with historic above-ground resources may be physically impacted by the construction of a pipeline in the form of tree cutting and other alterations to the landscape, and may be visually impacted by the construction of above-ground pipeline facilities (including compressor stations).

URS proposes that the pipeline area of potential effects (APE) for above-ground historic resources be limited to the boundaries of parcels that are crossed by the proposed project survey corridor. Where new above-ground facilities such as compressor stations are proposed, a one-quarter-mile visual APE is recommended. It is anticipated that the project area will include three compressor stations and that their locations will be known during the reconnaissance survey.

Secretary of the Interior-qualified architectural historians will conduct an architectural history field reconnaissance of parcels along the Preferred Alignment containing above-ground resources 50 years of age or older in the APE. This survey will include documentation of both previously recorded and newly identified historic resources that are in the APE for historic above-ground resources. All resources included in the survey will be documented with high resolution digital photography and will be plotted on maps.

URS will submit PHMC short forms for parcels in the APE containing resources aged fifty years of age or older that are clearly not eligible for the National Register as recommended in PHMC's Survey Guidelines for Pipeline Projects using data from the reconnaissance survey. This includes properties that are intersected by the proposed study corridor as well as properties in the visual APE of proposed compressor stations. URS will follow the PHMC guidelines for historic resource survey short forms.

For resources that are 50 years or older and outside the category of "clearly not eligible", a modified tabular Identification Documentation Submission will be submitted to PHMC. For agricultural properties, URS will follow the Survey Guidelines for Pipeline Projects published by your PHMC Bureau for Historic Preservation in June 2013. This table will also include any non-agricultural historic above-ground resources that we document in the APE along with our research recommendations. All resources included in the survey will be documented with high resolution digital photography and will be plotted on maps. URS will submit to PHMC the Identification Documentation Submission. PHMC may require intensive level survey of a limited number of resources that are submitted for their review. URS will complete full historic resource survey forms for such resources.

URS

PennEast PIPELINE

Unanticipated Discovery Plan

Before the project begins, the FERC requires the development of a SHPO-approved Unanticipated Discovery Plan (UDP). The UDP is included with this letter as Attachment D for your review and concurrence.

URS would appreciate your consideration of the enclosed material and timely response to the proposed investigations as described herein. I look forward to hearing from you, but in the meantime should you have any questions please feel free to contact me at (717) 635-7942 or at andrew.wyatt@urs.com.

Sincerely,



URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

ATTACHMENT A: USGS-based Map of the PennEast Pipeline Project

ATTACHMENT B: Project Maps with Previously-Recorded Archaeological Sites and Archaeological Sensitivity Model Overlay

ATTACHMENT C: Project Maps with Previously Recorded Architectural Resources

ATTACHMENT D: Unanticipated Discovery Plan

Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

September 10, 2014

URS Corporation
Attn: Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

RE: ER# 2014-1767-042-A
FERC: Cultural Resources Scoping Document for the Proposed PennEast Pipeline Project, Bucks, Carbon, Luzerne & Northampton Counties

Dear Mr. Wyatt:

The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. Our comments are as follows:

Thank you for providing this proposed plan to identify both above-ground and below-ground cultural resources which may be affected by the proposed PennEast Pipeline Project. We concur with the proposed methodology for field survey to identify these resources. We also concur with the proposed Unanticipated Discovery Plan for this project.

We look forward to reviewing the results of the cultural resources investigations to be carried out for this project. If you have any questions or comments concerning our review for above-ground resources, please contact Barbara Frederick at (717) 772-0921. If you have any questions or comments concerning our review for below-ground resources, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

Douglas C. McLearen, Chief
Division of Archaeology and Protection

March 31, 2015

Mr. Douglas McLearen
Pennsylvania Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, we would like to thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company, a subsidiary of New Jersey Resources; PSEG Power LLC; South Jersey Industries; Spectra Energy Partners; and UGI Energy Services (UGIES), a subsidiary of UGI Corporation.

As an interstate natural gas pipeline, PennEast will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. Over the past months, PennEast has worked to refine a preferred alternative route and to obtain permissions to survey. To that end, we must inform you that the preferred alternative route has again been adjusted to account for engineering, environmental, and land use constraints that have been identified since we last provided your agency with detailed project mapping on January 14, 2015.

Following feedback from FERC's scoping meetings and numerous conversations with landowners, state and local agencies, and other various stakeholders, PennEast has revised and refined various portions of the preferred alternative route. The largest variations to the previously released route are related to the location of the crossing of the Bethlehem Authority water supply mainline (MP 44 and MP 45), Appalachian Trail crossing (between MP 46 and MP 55), and accommodating future subdivision and housing development plans. Additional field data gained over the last month has helped make smaller adjustments related to environmental surveys and individual discussions with landowners.

In addition to the route variations noted above, an additional interconnect was needed for the Gilbert Power Generation facility in Holland Township, New Jersey, which is fed by a small lateral (12 inches) to supply natural gas to the facility. The previously located interconnection with Elizabethtown Gas was relocated so that both interconnects can be co-located within the power station's industrial property to minimize additional above-ground impacts.

A summary of the significant route variations in Pennsylvania is provided below:

- In Towamensing Township in Carbon County, PA, less than one mile of the alignment has been re-routed ¼-mile to the east as a result of consultations with the Bethlehem Authority (Authority). The alignment has been re-routed between mileposts 44 and 45 to cross the Authority's water supply mainline in a location where it is deeper in an effort to maximize protection of the Authority's resources.

- Straddling the Carbon – Northampton County line in PA, approximately 8 miles of the alignment between mileposts 46 and 55 has been re-routed up to 1 mile to the west of the previous route in an effort to refine the crossing location of the Appalachian Trail.

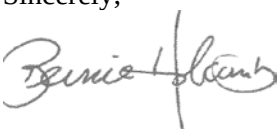
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- In Northampton County, PA, approximately 2.5 miles of the alignment has been re-routed less than ½-mile to the north of the previous route as a result of consultations with private landowners and local officials. The alignment has been re-routed between mileposts 59 and 62 to accommodate current and future land use plans in the area.

Updated USGS-based topographic maps for the entire new preferred alternative route are being provided to aide in your review and analysis of the project.

We look forward to continuing to work with you and your colleagues on this important project. Please contact me if you have any questions.

Sincerely,



Bernie Holcomb

Pipeline Environmental Services Manager

URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com

Fedex Tracking #: 773259075640

Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

22 April 2015

Mr. Bernie Holcomb
URS Corporation
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

RE: ER No. 2014-1767-042-I
FERC: Updated PennEast Pipeline Alignment
Bucks, Northampton, Carbon, & Luzerne Counties

Dear Mr. Holcomb:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Archaeological Resources
Significant archaeological sites are located in or near your project area and others are likely to exist. These resources could be adversely affected by project activities. A Phase I archaeological survey to verify the extent of known sites and to locate other sites is needed to determine their eligibility for listing in the National Register of Historic Places. Guidelines and instructions for conducting Phase I surveys are available on our web site or from our office upon request. The recorded sites in the area are listed below.

P.A.S.S. # 36BU0119 P.A.S.S. # 36BU0123 P.A.S.S. # 36NM0089

P.A.S.S. # 36NM0114 P.A.S.S. # 36NM0149 P.A.S.S. # 36NM0157

P.A.S.S. # 36NM0221

Historic Structures
An identification documentation submission of the project area is required to locate potentially significant above ground resources. Please see the "Survey Guidelines for Pipeline Projects – Above Ground Resources" for additional guidance located on our website: http://www.portal.state.pa.us/portal/server.pt/community/project_review_under_section_106_and_pa_history_code/3787/guidelines/415082 . For more information on survey strategies and methodologies, please contact the staff referenced below.

Based on a cursory review of our CRGIS on-line database and files, the following previously identified properties are located within the proposed project area:

Key No. 156670—Hildebrandt Farmstead (Undetermined)
Key No. 156166—Delaware, Lackawanna, & Western Railroad (Undetermined)
Key No. 001016—Lehigh Canal: Easton Section (National Register Listed)
Key No. 097158—Jeremiah Blanchard House (Undetermined)
Key No. 155754—Central Railroad of New Jersey (Undetermined)
Key No. 156109—Lehigh Valley Railroad (Undetermined)
Key No. 201072—Hickory Run Recreational Demonstration Area (National Register Eligible)
Key No. 144291—Appalachian Trail (National Register Eligible)
Key No. 156534—Lehigh & New England Railroad (Undetermined)
Key No. 156601—PNJ Interconnection: Wallenpaupack to Siegfried Transmission Line (National Register Eligible)
Key No. 157176—Fehnel Farm (National Register Eligible)
Key No. 096314—Koch Farm (National Register Eligible)
Key No. 086688—Site No. 3: Farmhouse, Barn, & Outbuildings (National Register Eligible)
Key No. 096315—Bayer Farm (National Register Eligible)
Key No. 096307—Anthony Oberly Farm (National Register Eligible)
Key No. 086674—Limekiln (Undetermined)
Key No. 143013—Christman Farm (National Register Eligible)
Key No. 123914—Isaac Stout House (National Register Listed)
Key No. 09081—1215 County Line (Undetermined)
Key No. 001661—Delaware Division of the Pennsylvania Canal (National Historic Landmark)

A preliminary review of this project indicates that there may be additional National Register-eligible historic buildings, structures, districts, or objects in the project area. Underground pipelines have the potential to affect these resources when compressor stations are proposed and/or the line requires clear cutting a new right-of-way or access roads through hedgerows, wooded area, other landscape features or placement of new features amongst clusters of buildings associated with a farm. A farm is defined as encompassing the farm dwelling(s), barn, outbuildings and the crop fields, meadows, pastures, orchards, woodlots, etc. and including landscape features such as fences, tree lines, contour strips, streams, etc. and circulation networks. Please use the PHMC-BHP Historic Agricultural Resources of Pennsylvania, c 1700-1960 context which is available here: http://www.portal.state.pa.us/portal/server.pt/community/pennsylvania%27s_agricultural_history/2584 to determine the identified agricultural region your project is located within and its registration requirements (farm, farmstead, or rural historic district).

Section 106 Consultation
As the project has the potential to affect National Register-eligible and listed resources, in accordance with the regulations for Section 106 (36 CFR 800.2.a.4), federal agencies, or those acting on their behalf, are required to consider the effects of their undertakings on historic properties in consultation with identified historic preservation stakeholders. Consultation is defined as the process of seeking, discussing and considering the views of other participants and, where feasible, seeking agreement with them regarding matters arising in the Section 106 process. Please provide documentation of your agency's efforts to identify consulting parties with an interest in the effect of this project on historic properties.

If you need further information regarding archaeological resources, please contact Mark Shaffer at (717) 783-9900. If you need further information concerning historic structures, please contact Emma Diehl at (717) 787-9121.

Sincerely,

Douglas C. McLearen, Chief
Division of Archaeology and Protection

URS

PennEast PIPELINE

September 24, 2015

Mr. Douglas McLearen
Attn: Mr. Mark Shaffer
Pennsylvania Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

RECEIVED ON
SEP 24 '15
BUREAU FOR
HISTORIC PRESERVATION

Re: ER# 2014-1767-042
Phase I Archaeological Survey Report and Unanticipated Discovery Plan, PennEast Pipeline Project, Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, (PennEast) URS is submitting a Phase I Archaeological Survey Report for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). The report details archaeological survey conducted in 2014 and 2015 on the preferred alignment. The Phase I survey identified 18 archaeological sites and five isolated finds in a 400-foot-wide study corridor centered on the proposed Project centerline. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, and proposed treatments for each of these resources are contained in the report and are summarized below.

Archaeological Resources in the Area of Potential Effects

Phase I survey identified eight archaeological sites and four isolated finds in the area of potential effects (APE). Five of these archaeological sites and the four isolated finds (36LU050, 36NM0324, 36NM0337, 36NM0338, 36NM0339, 36NM0342, 36NM/168, 36NM/169, and 36BU/103) are recommended as not eligible for listing on the NRHP; therefore, no further investigation or avoidance measures are recommended for these resources.

One site (36NM0330) is a portion of a larger archaeological site located adjacent to the APE. URS recommends that the portion of this site within the APE is not likely to contribute to the NRHP eligibility of the portion of the larger site and that no further investigation of the portion of the site within the APE is needed. The portion of 36NM0330 lying adjacent to the APE is recommended to be potentially NRHP eligible. In order to prevent unintentional damage to the potentially NRHP eligible portion of this site during Project construction, an avoidance plan was prepared and is included in Appendix C of the report.

Two sites (36CR0149, 36NM0328) are recommended as potentially eligible for listing on the NRHP. Based on current Project design, these sites will be affected by the Project; therefore PennEast will perform Phase II evaluations on these two sites to determine their NRHP eligibility.

Archaeological Resources Adjacent to the APE

Six archaeological sites and one isolated find were identified outside of but adjacent to the APE. URS recommends that one of these sites (36LU0330) and the isolated find (36NM/170) are not eligible for listing on the NRHP; therefore no further investigation or avoidance measures are recommended for these resources.

URS recommends that five of the archaeological sites (CEMLU0008, 36NM0336, 36NM0327, 36NM0343, and 36NM0329) are potentially eligible for listing on the NRHP. In order to prevent unintentional damage to these sites during Project construction, an avoidance plan was prepared and is included in Appendix C of the report.

Other Identified Archaeological Resources

Four archaeological sites (36CR0150, 36NM0331, 36NM0340, and 36NM0341) were identified in the study corridor for the preferred alignment or in study corridors for reroutes no longer under consideration and are recommended as potentially eligible for listing on the NRHP. These sites are located at sufficient distances from the APE such that no further investigation or avoidance measures are recommended provided that the APE limits do not change.

Also enclosed for your review is the Project's Unanticipated Discovery Plan (UDP), which has been revised to reflect FERC's comments.

I look forward to receiving your comments on the report and the UDP, but in the meantime should you have any questions please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com.

Sincerely,

URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)

Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
http://phmc.info/historicpreservation

October 22, 2015

URS Corporation
Attn: Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

RE: ER# 2014-1767-042-M
FERC: Phase I Archaeological Survey Report
PennEast Pipeline Project. Luzerne, Carbon,
Northampton and Bucks Counties

Dear Mr. Wyatt:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. Our comments are as follows:

Archaeological Sites within the APE

We agree with the recommendation that Phase II archaeological investigations are necessary to assess the eligibility of Sites 36CR0149 and 36NM0328 for listing in the National Register of Historic Places.

We agree with the recommendations that the following sites are not eligible for listing in the National Register of Historic Places and that no further investigation or avoidance is necessary for these sites:

36 NM0324; 36NM0337; 36 NM0338; 36NM0339; 36NM0342.

We agree with the recommendation that the portion of Site 36NM0330 located within the APE does not contribute to the potential eligibility of the greater portion of this site located adjacent to the APE. We also agree with the proposed avoidance plan for the greater portion of this site.

We agree with the recommendation that no further investigation or avoidance is necessary for the following isolated finds, which we agree are not eligible for listing in the National Register of Historic Places:

36LU/050; 36NM/168; 36NM/169; 36BU/103

Archaeological Sites Adjacent to the APE

We agree with the recommendations that Site 36LU0330 is not eligible for listing in the National Register of Historic Places and that no further investigation or avoidance is necessary for this site.

We agree with the proposed avoidance plans for the following sites:

36NM 0327; 36NM0329; 36NM0336; 36NM0343

We also agree with the proposed avoidance plan for the historic cemetery, CEMLU0008, but as an added safeguard, in our opinion, a qualified archaeologist should be on site to monitor all project-related ground disturbing activity in the vicinity of the cemetery, as it is not uncommon for unmarked burials to be located around the perimeter of areas marked by grave stones.

We agree with the recommendation that no further investigation or avoidance is necessary for isolated find 36NM/170, which we agree is not eligible for listing in the National Register of Historic Places.

Other Identified Archaeological Sites

We agree with the recommendation that no further investigation or avoidance is necessary for the following sites provided that the current limits of the APE do not change:

36CR0150; 36NM0331; 36NM0340; 36NM0341.

If the limits of the APE change such that any of the aforementioned resources is impacted by project activities, please continue consultation with our office.

We also concur with the proposed Unanticipated Discovery Plan for this project.

On an editorial note, we suggest you correct the typographical error on Page E-5 of Appendix C, in which the discussion of Site 36NM0330 in Williams Township, Northampton County references Site 36NM0329. You should also correct Figure 5.288, the site plan for Site 36NM0342 to reflect the fact that two concrete pads rather than two privies are located within the boundaries of this site. Please provide the corrected pages and we will incorporate them into the hard copy of the report you submitted. Also, please provide three electronic versions of all volumes of this report on three separate CDs for our files and for distribution to the other report repositories. We appreciate your cooperation.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

Douglas C. McLearen, Chief
Division of Archaeology and Protection

December 17, 2015

Mr. Douglas McLearen
Pennsylvania Historical & Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042, Updated PennEast Pipeline Alignment
PennEast Pipeline Company, LLC – PennEast Pipeline Project
Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company (PennEast), thank you for your continued coordination on the proposed PennEast Pipeline Project. PennEast is a joint project of AGL Resources; NJR Pipeline Company; PSEG Power; SJI Midstream; Spectra Energy Partners; and UGI Energy Services.

As an interstate natural gas pipeline, PennEast Pipeline will be regulated by the Federal Energy Regulatory Commission (FERC). FERC issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) for this project on January 13, 2015. PennEast filed Certificates of Public Convenience and Necessity and Related Authorizations with FERC on September 24, 2015. Since the September 24 filing, PennEast has evaluated several additional route alternatives based on discussions with landowners, regulatory agencies and other stakeholders, as well as comments filed in this proceeding. In light of those evaluations, PennEast has adopted five minor deviations from the route proposed in the September 24 Filing:

- Deviation No. 1005 is located between mileposts ("MP") 9.07 and 12.10 in Luzerne County, Pennsylvania. PennEast adopted this deviation to address landowner concerns and to improve constructability of the proposed Project route. The landowner and quarry operators affected by this portion of the proposed Project route indicated that the proposed route in the September 24 Filing has the potential to adversely affect quarry operations. Additionally, this portion of the route in the September 24 Filing route presented a challenging crossing of Mill Creek. Deviation No. 1005 addresses both of these concerns. In addition, this deviation reduces the overall length of the Project and increases the route's co-location with existing utility easements.
- Deviation No. 1400 is located between MP 43.95 and 44.55 in Carbon County, Pennsylvania. This deviation has been adopted based on feedback that PennEast received in collaboration with

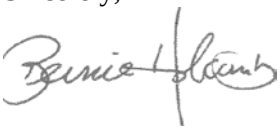
the Bethlehem Authority, which operates a water supply system in Carbon and Northampton Counties, Pennsylvania. Deviation No. 1400 provides a means of crossing the Bethlehem Authority waterline by a trenchless method and avoids the need to locate temporary workspace near the waterline. This deviation also includes a single HDD crossing of Beltzville Lake, instead of the two crossings that were proposed in the September 24 Filing, which minimizes impacts to the Beltzville State Park.

- Deviation No. 1701 is located between MP 79.10 and 81.60 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route and is based on feedback that PennEast received in collaboration with the New Jersey Department of Environmental Protection. Deviation No. 1701 minimizes impacts to the New Jersey Natural Lands Trust's Gravel Hill Preserve by increasing co-location with existing utility easements and impacting fewer parcels within the Gravel Hill Preserve. In addition, this deviation allows the proposed route to be in closer proximity to the proposed NRG REMA, LLC/Elizabethtown Gas delivery meter station, and it also relocates a proposed mainline valve from a residential area to an industrial area.
- Deviation No. 1802 is located between MP 84.68 and 86.54 in Hunterdon County, New Jersey. This deviation has been adopted to optimize the Project route to avoid crossing a federally preserved farm. PennEast considered different alternatives to avoid this crossing, and the adopted Deviation No. 1802 minimizes land use impacts and overall land requirements to avoid this crossing.
- Deviation No. 1900 is located between MP 91.91 and 93.55 in Hunterdon County, New Jersey. This deviation has been adopted to incorporate a route optimization that avoids crossing the Lockatong Creek three times with an open cut. This deviation now allows the Project route to cross the Lockatong Creek using a trenchless method. Deviation No. 1900 also avoids impacts to both a federally preserved farm and a New Jersey Green Acres Program protected parcel.

USGS 7.5 minute quadrangle maps with the project area are enclosed to facilitate your review. We look forward to continuing to work with you and your colleagues on this important Project. Please contact me if you have any questions.

On behalf of Jeff England, PennEast Project Manager

Sincerely,



Bernie Holcomb
Pipeline Environmental Services Manager

URS Corporation 625 West Ridge Pike, Suite E-100; Conshohocken, PA 19428
Direct: 610 832 1810; Cell: 215 275-7956; Fax: 610-832-3501 bernard.holcomb@urs.com

FedEx Tracking #: 7752 4000 0018

URS

PennEast PIPELINE

March 18, 2016

RECEIVED ON
MAR 18 '16
BUREAU FOR HISTORIC PRESERVATION

Mr. Douglas McLearen
Attn: Mr. Mark Shaffer
Pennsylvania Historical & Museum Commission
Pennsylvania State Historic Preservation Office
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093

Re: ER# 2014-1767-042
Phase I Archaeological Survey Report,PennEast Pipeline Project, Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania. Addendum 1

Dear Mr. McLearen:

On behalf of PennEast Pipeline Company, LLC, (PennEast) URS is submitting an addendum to the Phase I Archaeological Survey Report for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). This addendum details archaeological survey conducted between July 2015 and February 2016 on the preferred alignment and associated facilities. The Phase I survey identified eight archaeological resources within or adjacent to the area of potential effects (APE) for the preferred alignment. The addendum also includes the results of Phase I survey on areas that are no longer included on the preferred alignment. Phase I survey in these areas identified 12 archaeological resources. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, and proposed treatments for each of these resources are contained in the report.

Appendix D contains proposed Phase II workplans for the NRHP evaluation of sites 36CR0149 and 36NM328. These sites were documented in the initial Phase I report for the Project, which was reviewed by your office under ER# 2014-1767-042-M.

I look forward to receiving your comments on the report and the Phase II workplans, but in the meantime should you have any questions please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com.

Sincerely,

URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)

April 14, 2016

Mr. Andrew Wyatt, Senior Archaeologist
URS Corporation
4507 North Front Street, Suite 200
Harrisburg, PA 17110

ER 2014-1767-042-T
FERC Docket No. CP15-558-000
Phase I Archaeological Survey Report, Addendun 1, PennEast Pipeline Project, Luzerne, Carbon, Northampton and Bucks Counties

Dear Mr. Wyatt:

Thank you for submitting this report for the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. Our comments are as follows:

Archaeological Sites within the APE

We agree with the recommendation that Phase I testing should be completed at Sites 36LU0110 and 36LU0337 once access to these properties is available. The results of this additional Phase I testing should be provided to our office in another Phase I addendum report.

We agree with the recommendation that no further work is needed for the portion of Site 36NM0345 located with the APE. It is our understanding that the portion of this site located adjacent to the APE will be avoided by project impacts by marking the site boundaries adjacent to the APE on construction plans, fencing this area of the site off and monitoring at the time of construction in order to avoid inadvertent impacts to this portion of the site. We concur with this avoidance proposal for this site.

It is our understanding that Site 36NM0346 will be avoided because project impacts in this area will involve horizontal directional drilling at a depth of from 110 to 137 feet beneath the site. Based on this, in our opinion, no further work is necessary for Site 36NM0346.

Based on the results of this investigation, we agree with the recommendation that Site 36Nm0347, the stone springbox, is not eligible for listing in the National Register of Historic Places. In our opinion, no further work is necessary for this site.

We concur with the avoidance plan that is proposed for Site 36BU0454, to include marking the site boundaries on construction plans, covering the portion of the site within the access road limit-of-disturbance with geotextile and fill in order to lessen soil compaction and vehicle rutting in the site area, and fencing the limits of the of the access road prior to

construction in order to avoid inadvertent impacts to the portions of the site located outside of the access road limit-of-disturbance.

Archaeological Sites Adjacent to the APE

We concur with the avoidance plan that is proposed for Site 36LU0338, to include marking the site boundaries on construction plans, fencing the site boundaries off, and monitoring at the time of construction in order to avoid inadvertent impacts to this site.

Based on the results of this investigation, we agree with the recommendation that Site 36LU0339, a very low density lithic scatter, is not eligible for listing in the National Register of Historic Places. In our opinion, no further work is necessary for this site.

Archaeological Sites in Abandoned Alignment Segments

It is our understanding that none of the nine sites identified on pipeline alignment segments that have since been eliminated from consideration will be affected by the current preferred alignment. This pertains to Sites CEMLU009, CEMNM 0001, 36CR0151, 36CR0152, 36NM0325, 36NM0326, 36NM0332, 36NM0344 and 36BU0442. If project plans are amended, such that any of these resources is impacted by project activities, then we agree with the recommendation for Phase II archaeological evaluations in order to assess the eligibility of these resources for listing in the National Register of Historic Places.

Isolated Finds

We agree with the recommendation that no further work is necessary for the following Isolated Finds:

36CR/003, 36NM/167 and 36NM/171

Please provide three electronic versions of this report (including all figures) on three separate compact disks. We appreciate your cooperation. If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900 or MShaffer@pa.gov.

Sincerely,

Douglas C. McLearen, Chief
Division of Archaeology and Protection

Native American Consultation - Absentee Shawnee Tribe of Indians of Oklahoma

December 31, 2014

Joseph Blanchard, THPO
Absentee-Shawnee Tribe of Indians of Oklahoma
2025 S. Gordon Cooper Drive
Shawnee, Oklahoma 74801

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Blanchard,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772426267244

December 31, 2014

Edwina Butler-Wolfe, Governor
Absentee-Shawnee Tribe of Indians of Oklahoma
2025 S. Gordon Cooper Drive
Shawnee, Oklahoma 74801

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Butler-Wolfe,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

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On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772426298357

December 31, 2014

Ms. Liana Stacy Hesler
Absentee Shawnee Tribe of Oklahoma
2025 S. Gordon Cooper Drive
Shawnee, OK 74801

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Hesler,

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On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard P. Holcomb

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772426315504

RECORD OF CONTACT

February 13, 2015, 10:30 am

Grace Ziesing, URS Senior Archaeologist (610-832-2791; grace.ziesing@aecom.com)
Eddie Brokeshoulder, Absentee Shawnee Tribe of Indians of Oklahoma, Office of Governor Edwina Butler-Wolfe (405-275-4030, ext. 6307)

RE: PennEast Pipeline Project
Follow-up to December 31, 2014, Project Introduction Letters Addressed to Governor Edwina Butler-Wolfe, Liana Stacy Hesler, and Joseph Blanchard

Ms. Ziesing called the main phone number for the Absentee Shawnee Tribe of Indians of Oklahoma and requested the Governor's office. Mr. Brokeshoulder answered the phone and said that Ms. Edwina Butler-Wolfe was in a meeting, but offered his assistance. Ms. Ziesing explained that she was calling on behalf of PennEast in reference to the PennEast Project and the project information letter sent to Ms. Butler-Wolfe on December 31, 2014. Mr. Brokeshoulder said that the letter would have been forwarded to the Cultural Department, which is headed by Joseph Blanchard. He provided the correct extension number (6310) for the Cultural Department. He stated that he was not aware of anyone by the name of Liana Stacy Hesler within the Cultural Department (who was also sent a Project Information Letter).

Ms. Ziesing called the Cultural Department (405-275-4030, ext. 6310) and left a message explaining the reason for the call and a phone number at which she could be reached.

From: Ziesing, Grace
To: "joseph.blanchard@astribe.com"; "lhesler@astribe.com"
Cc: Holcomb, Bernard; Wyatt, Andrew
Subject: PennEast Project
Date: Tuesday, August 04, 2015 5:34:00 PM
Importance: High

Dear Mr. Blanchard and Ms. Hesler—

A letter introducing the PennEast Pipeline project was sent to you on December 31, 2014. Having received no response, I called the Absentee Shawnee Tribe of Indians of Oklahoma cultural department and left a message (on 2/13/2015 and again on 3/20/2015). Although we have not yet received a response from you, we would still like your input on the project.

We respectfully request a formal response via letter or email confirming or declining your group's participation in the project.

If you need further information in order to respond, please let me know.

Thank you,

--Grace

Grace H. Ziesing, RPA
Senior Archaeologist
Design and Consulting Services Group (DCS)
D 1-610-832-2791
grace.ziesing@aecom.com

AECOM
625 West Ridge Pike, Suite E-100, Conshohocken, Pennsylvania 19428
T 1-610-832-3500 F 1-610-832-3501
www.aecom.com

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Native American Consultations - Cayuga Nation

December 31, 2014

Chief William Jacobs
Cayuga Nation
P.O. Box 803
Seneca Falls, NY 13148

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Chief Jacobs,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

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The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215696874

December 31, 2014

Timothy Two Guns
Cayuga Nation
P.O. Box 803
Seneca Falls, NY 13148

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Two Guns,

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215696881

RECORD OF CONTACT

February 13, 2015, 11:00 am

Grace Ziesing, URS Senior Archaeologist (610-832-2791; grace.ziesing@aecom.com)
Receptionist, Cayuga Nation Tribal Office (315-568-0750)

RE: PennEast Pipeline Project
Follow-up to December 31, 2014, Project Introduction Letters Addressed to Chief William Jacobs and Timothy Two Guns

Ms. Ziesing called the main phone number for the Cayuga Nation and requested to speak to Chief William Jacobs or Timothy Two Guns. The receptionist informed Ms. Ziesing that William Jacobs was not associated with the Cayuga Nation and that there was no contact information available. The receptionist then stated that Mr. Two Guns was not in the office. Ms. Ziesing asked if she could leave a message, at which point the receptionist provided his email address instead. Ms. Ziesing wrote an email to Mr. Two Guns requesting that he provide a response to the Project Information Letter sent to him on December 31, 2014.

From:	Ziesing, Grace
To:	"timtwoguns@verizon.net"
Cc:	Holcomb, Bernard; Wyatt, Andrew (andrew.wyatt@urs.com)
Subject:	RE: PennEast Project
Date:	Tuesday, August 04, 2015 4:49:00 PM
Importance:	High

Dear Mr. Twoguns:

Your email address was provided to me by the Cayuga Nation tribal office, who told me this is the best means of contacting you. We have not received a response to either of the emails below, but would still like any input you might have on the PennEast Pipeline project. The project was introduced to you in a letter dated December 31, 2014, and received by your office on January 6, 2015.

We respectfully request a formal response via letter or email confirming or declining your group's participation in the project.

Thank you,

--Grace

Grace H. Ziesing, RPA
Senior Archaeologist
Design and Consulting Services Group (DCS)
D 1-610-832-2791
grace.ziesing@aecom.com

AECOM
625 West Ridge Pike, Suite E-100, Conshohocken, Pennsylvania 19428
T 1-610-832-3500 F 1-610-832-3501
www.aecom.com

AECOM and URS have joined together as one company. Learn more.
Please note my new AECOM email address.

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From: Ziesing, Grace
Sent: Friday, March 20, 2015 12:56 PM
To: 'timtwoguns@verizon.net'
Cc: Holcomb, Bernard; Wyatt, Andrew (andrew.wyatt@urs.com)
Subject: RE: PennEast Project

Dear Mr. Twoguns:

I am following up on the email below as I have not heard back from you.

Please confirm that you received our initial letter dated December 31, 2014, which was sent via USPS Certified Mail and signed for by Tina Orbaker on January 6, 2015.

Let me know if you need more information before providing a response.

Thank you,

--Grace

Grace H. Ziesing, RPA
Senior Archaeologist
Design and Consulting Services Group (DCS)
D 1-610-832-2791
grace.ziesing@aecom.com

AECOM
625 West Ridge Pike, Suite E-100, Conshohocken, Pennsylvania 19428
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AECOM and URS have joined together as one company. Learn more.
Please note my new AECOM email address.

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From: Ziesing, Grace
Sent: Friday, February 13, 2015 11:37 AM
To: 'timtwoguns@verizon.net'
Cc: Holcomb, Bernard; Wyatt, Andrew (andrew.wyatt@urs.com)
Subject: PennEast Project

Dear Mr. Twoguns:

I am writing on behalf of PennEast Pipeline Company, LLC, to follow up on a letter sent to you on December 31, 2014, introducing the PennEast Project and requesting your participation as an interested party. We respectfully request a formal response via letter or email confirming or declining your group's participation.

Please let me know if you need further information before providing your response.

Thank you,

--Grace

Grace H. Ziesing, RPA
Senior Archaeologist
Design and Consulting Services Group (DCS)
D 1-610-832-2791

grace.ziesing@aecom.com

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Native American Consultations - Delaware Nation

December 31, 2014

Ms. Tamara Francis-Fourkiller, THPO
The Delaware Nation
Cultural Preservation Office
31064 State Highway 281
Anadarko, Oklahoma 73005

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Francis-Fourkiller,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites,

buildings, structures, or objects that are included in or eligible for inclusion in the National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

December 31, 2014

Kerry Holton, Tribal President
The Delaware Nation
P.O. Box 825
Anadarko, Oklahoma 73005

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Holton,

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215696911

December 31, 2014

Darrin Ahshapanek, EPA Director
Delaware Nation
31064 State Highway 281
Anadarko, OK 73005

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Ahshapanek,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215696928

The Delaware Nation
Cultural Preservation Office
P.O. Box 825 - 31064 State Highway 281- Anadarko, OK 73005
Phone: 405/247-2448 – Fax: 405/247-8905

NAGPRA ext. 1403
Section 106 ext. 1181
Museum ext. 1181
Library ext. 1196
Clerk ext. 1182

February 11, 2015

RE: PennEast Pipeline Company, LLC, Proposed PennEast Pipeline Project-Bucks, Northampton, Carbon, and Luzerne Counties, PA – Hunterdon and Mercer Counties, NJ

Mr. Holcomb,

The Delaware Nation Cultural Preservation Department received correspondence regarding the above referenced project. Our office is committed to protecting sites important to tribal heritage, culture and religion. Furthermore, the tribe is particularly concerned with archaeological sites that may contain human burials or remains, and associated funerary objects.

As described in your correspondence and upon research of our database(s) and files, we find that the Lenape people occupied this area either prehistorically or historically. However, the location of the project does not endanger cultural or religious sites of interest to the Delaware Nation. Please continue with the project as planned. However, should this project inadvertently uncover an archaeological site or object(s), we request that you halt all construction and ground disturbance activities and immediately contact the appropriate state agencies, as well as our office (within 24 hours).

Please Note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation Cultural Preservation Office to conduct proper Section 106 consultation. Should you have any questions regarding this email or future consultation feel free to contact our offices at 405-247-2448 or by email nalligood@delawarenation.com.

Sincerely,

Nekole Alligood

Nekole Alligood
Director

Native American Consultations - Delaware Tribe

December 31, 2014

Blair Fink
Delaware Tribe of Indians Historic Preservation Representative
Department of Anthropology
Gladfelter Hall, Temple University
1115 W. Polett Walk
Philadelphia, Pennsylvania 19122

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Fink,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772426466633

December 31, 2014

Susan Bachor
Delaware Tribe Historic Preservation Representative
Department of Anthropology
Gladfelter Hall, Rm. 207
Temple University
1115 W. Polett Walk
Philadelphia, Pennsylvania 19122

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Bachor,

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Sincerely
URS Corporation,



Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772426495662

December 31, 2014

Dr. Brice Obermeyer, THPO
Delaware Tribe of Indians
Delaware Tribe Historic Preservation Office
1200 Commercial St.
Roosevelt Hall, Rm. 212
Emporia, Kansas 66801

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Dr. Obermeyer,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772430232275

December 31, 2014

Paula Pechonick, Chief
Delaware Tribe of Indians
Delaware Tribal Headquarters
170 N Barbara Avenue
Bartlesville, Oklahoma 74003

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Chief Pechonick,

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Sincerely
URS Corporation,



Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772430237597

Delaware Tribe Historic Preservation Representatives
Department of Anthropology
Rm. 207, Gladfelter Hall
Temple University
1115 W. Polett Walk
Philadephia, PA 19122
temple@delawaretribe.org

January 8, 2015
URS Corporation
Att: Bernard Holcomb
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

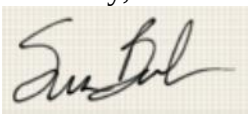
RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne Counties, Pennsylvania and Hunterdon and Mercer Counties, NJ
FERC Process Participation Request

Dear Mr. Holcomb,

Thank you for informing the Delaware Tribe regarding the above referenced project. The Delaware Tribe is committed to protecting historic sites important to our tribal heritage, culture and religion. We would like to enter into consultation on this project. We appreciate your cooperation and look forward to working together on our shared interests in preserving Delaware cultural heritage.

If you have any questions, feel free to contact this office by phone at (610) 761-7452 or by e-mail at temple@delawaretribe.org.

Sincerely,



Susan Bachor
Delaware Tribe Historic Preservation Representative
Department of Anthropology
RM. 207, Gladfelter Hall
Temple University
1115 W. Polett Walk
Philadephia, PA 19122
temple@delawaretribe.org
610-761-7452

September 24, 2015

Susan Bachor
Delaware Tribe Historic Preservation Representative
Department of Anthropology
Gladfelter Hall, Rm. 207
Temple University
1115 W. Polett Walk
Philadelphia, Pennsylvania 19122

Re: Phase I Archaeological Survey Reports
PennEast Pipeline Project, Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania, Hunterdon and Mercer Counties, New Jersey

Dear Ms. Bachor:

On behalf of PennEast Pipeline Company, LLC, (PennEast) and as requested in your email of March 4, 2015, URS is submitting Phase I archaeological survey reports for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). The reports detail archaeological survey conducted in 2014 and 2015 on the preferred alignment in Pennsylvania and New Jersey. The Phase I survey identified 18 archaeological sites and five isolated finds in Pennsylvania and six archaeological sites and 11 isolated finds in New Jersey. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, and proposed treatments for each of these resources are contained in the reports.

I look forward to receiving your comments on the reports. In the meantime, should you have any questions regarding the report for Pennsylvania, please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com. If you have any questions on the report for New Jersey, please contact Grace Ziesing at 610.832.2791 or at grace.ziesing@urs.com.

Sincerely,



URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)

Fedex Tracking Number 774589009408

March 28, 2016

Susan Bachor
Delaware Tribe Historic Preservation Representative
111 Hillside Terrace
Pocono Lake, PA 18347

Re: FERC Docket # CP15-558-000
Phase I Archaeological Survey Report, PennEast Pipeline Project, Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania. Addendum 1.

Dear Ms. Bachor:

On behalf of PennEast Pipeline Company, LLC, (PennEast) and as requested in your email of March 4, 2015, URS is submitting an addendum to the Phase I Archaeological Survey Report for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). This addendum details archaeological survey conducted between July 2015 and February 2016 on the preferred alignment and associated facilities. The Phase I survey identified eight archaeological resources within or adjacent to the area of potential effects (APE) for the preferred alignment. The addendum also includes the results of Phase I survey on areas that are no longer included on the preferred alignment. Phase I survey in these areas identified 12 archaeological resources. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, and proposed treatments for each of these resources are contained in the report.

I look forward to receiving your comments on the reports. In the meantime, should you have any questions regarding the report, please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com.

Sincerely,

URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)

Fedex Tracking Number 7759 7613 5026

Native American Consultations - Eastern Shawnee Tribe

December 31, 2014

Glenna Wallace, Chief
Eastern Shawnee Tribe of Oklahoma
P.O. Box 350
Seneca, MO 64865

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Chief Wallace,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215696898

December 31, 2014

Ms. Robin Dushane
Cultural Preservation Officer
Eastern Shawnee Tribe of Oklahoma
P.O. Box 350
Seneca, MO 64865

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Dushane,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites,

buildings, structures, or objects that are included in or eligible for inclusion in the National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215696935

December 31, 2014

Ms. Roxane Weldon, EPA Director
Cultural Preservation Officer
Eastern Shawnee Tribe of Oklahoma
P.O. Box 350
Seneca, MO 64865

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Weldon,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites,

buildings, structures, or objects that are included in or eligible for inclusion in the National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

From:	Ziesing, Grace
To:	"rdushane@estoo.net"
Cc:	Holcomb, Bernard; Wyatt, Andrew
Subject:	PennEast Project
Date:	Tuesday, August 04, 2015 5:08:00 PM
Importance:	High

Dear Ms. Dushane—

A letter introducing the PennEast Pipeline project was sent to you on December 31, 2014, and, at your request, again on March 20, 2015. We have not yet received a response from you, but would still like your input on the project.

We respectfully request a formal response via letter or email confirming or declining your group's participation in the project.

Thank you,

--Grace

Grace H. Ziesing, RPA
Senior Archaeologist
Design and Consulting Services Group (DCS)
D 1-610-832-2791
grace.ziesing@aecom.com

AECOM
625 West Ridge Pike, Suite E-100, Conshohocken, Pennsylvania 19428
T 1-610-832-3500 F 1-610-832-3501
www.aecom.com

AECOM and URS have joined together as one company. Learn more.
Please note my new AECOM email address.

This e-mail and any attachments contain AECOM confidential information that may be proprietary or privileged. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information and you should destroy the e-mail and any attachments or copies.

Native American Consultations - Onieda Indian Nation

December 31, 2014

Raymond Halbritter, Nation Representative
Oneida Indian Nation
5218 Patrick Road
Verona, NY 13478

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Halbritter,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772430240940

December 31, 2014

Jesse Bergevin, Historian
Oneida Indian Nation
1256 Union Street
P.O. Box 662
Oneida, NY 13421

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Bergevin,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites,

buildings, structures, or objects that are included in or eligible for inclusion in the National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215696959

December 31, 2014

Laura Misita, Land Administrator
Oneida Indian Nation
5218 Patrick Road
Verona, NY 13478

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Misita,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

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- Project overview map with project alignment;
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On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772430245209

December 31, 2014

Stephen J. Selden, Esq.
General Council
Oneida Indian Nation
5218 Patrick Road
Verona, NY 13478

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Selden,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

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On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772432323839

ONEIDA INDIAN NATION

JESSE J. BERGEVIN
HISTORIC RESOURCES SPECIALIST

DIRECT DIAL: (315) 829-8463
FACSIMILE: (315) 829-8473
E-MAIL: jbergevin@oneida-nation.org

ONEIDA NATION HOMELANDS

January 20, 2015

Bernard Holcomb
Pipeline Environmental Services Manager
URS
625 West Ridge Pike, Suite E-100
Conshohocken, Pennsylvania 19428
(*Transmitted via email*)

Re: PennEast Pipeline Company, L.L.C.
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Holcomb,

The Oneida Indian Nation (the "Nation") received a letter dated December 31, 2014, from PennEast Pipeline Company, LLC ("PennEast") regarding the proposed PennEast Pipeline Project (the "Project"). In this letter, PennEast asks for information regarding any cultural resources of significance to the Nation that could be affected by the Project.

Based upon our review, it appears that portions of the Project's area of potential effects ("APE") are located within the Oneida Indian Nation's aboriginal territory. In light of this, there is a potential for the presence of significant historic resources with the Project's APE, including the potential for past settlements of Oneida ancestors and for the presence of Sacred Stone Landscapes, which are culturally significant to the Nation. The Nation is concerned that planned cultural resources studies for the Project's APE may not be sufficient to address and identify these potential resources. The Nation, therefore, requests to be included in the development of the planned scope of work for and review of any proposed archaeological or cultural resource surveys for the Project.

As planning for the Project progresses, the Nation requests that PennEast, along with its consultant URS, work with the Nation during the development of the Environmental Review, as part of the Federal Energy Regulatory Commission ("FERC") certification process, and that FERC consults with the Nation before making any decisions or determinations in the Section 106 process concerning the Project's APE, level of effort to identify historic properties, presence or absence of historic properties, National Register of Historic Places eligibility, findings of no effect or adverse effect and measures to address or resolve adverse effects.

If you have any questions, please call me at (315) 829-8463.

Very truly yours,

ONEIDA INDIAN NATION

Jesse J. Bergevin

FedEx Tracking No.: 7728 5628 5122

February 6, 2015

Jesse Bergevin, Historian
Oneida Indian Nation
1256 Union Street
P.O. Box 662
Oneida, NY 13421

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
Oneida Indian Nation Response to FERC Process Participation Request

Dear Mr. Bergevin,

Thank you for your response to our initial request for the views of the Oneida Indian Nation (Nation). Attached is a copy of our archaeological field survey methods that you requested in your letter to Bernard Holcomb dated January 20, 2015 and your telephone conversation with Grace Ziesing on January 16, 2015. These methods were approved by the Pennsylvania Historical and Museum Commission (PHMC) in a letter dated September 10, 2014. Approval by the New Jersey Historic Preservation Office (NJHPO) is pending.

These field methods do not specifically mention efforts to identify Sacred Stone Landscapes important to the Nation; however, the supervisor in charge of the field survey is familiar with the stone piles that indicate these landscapes from his work on the Constitution Pipeline Project. Although none have been encountered in our archaeological survey efforts for the PennEast Pipeline Project so far, please be assured that we will record them as archaeological sites with the PHMC and NJHPO if they are present within the 400-foot study corridor for the Project. We will also notify the Project's engineers of their location so that they can be avoided if possible. As you requested in your letter of January 20, 2015, we will provide copies of archaeological survey reports for your review. Based on your January 16, 2015 telephone conversation with Grace Ziesing, we will provide you with descriptions of potentially significant sites in Pennsylvania by email prior to completing the archaeological survey report.

If you have any questions or comments, please do not hesitate to contact me at (717) 635-7942 or at andrew.wyatt@urs.com.

Yours truly,

URS Corporation



Andrew Wyatt
Senior Archaeologist

URS Corporation
4507 North Front Street, Suite 200
Harrisburg, PA 17110
Tel: 717.635.7942
Fax: 717.635.7902

w/Enclosure

cc: Jeff England – UGI

PENNEAST PIPELINE PROJECT
ARCHAEOLOGICAL SURVEY METHODS

Archaeology team members will employ standard archaeological survey methods in order to test proposed pipeline land requirements for the presence of archaeological sites. These methods include:

- **Visual pedestrian survey** (walkover) of the entire 400-foot wide study corridor, as well as extra workspaces. A crew of up to 11 field archaeologists will make observations regarding terrain, vegetation, and surface anomalies. The crew will walk the study corridor at a set interval and inspect the exposed ground surface to identify artifacts.

- **Shovel testing** of level and nearly level areas within the direct APE. Individual shovel tests are holes dug into the ground surface 50 centimeters (20 inches) in diameter, and typically extending 50 centimeters (20 inches) or less in depth.

- **Test Unit excavation** will be undertaken at a limited number of stream crossings to identify archaeological sites that may be buried below a depth of approximately 75 centimeters (~2.5 feet) below ground surface. Test Units will measure 1.0 x 1.0 meters (3.3 x 3.3 feet) on a side and may extend up to 1.5 meters (~five feet) deep.

- Shovel testing and Test Units are excavated at 15- or 30-meter (~50- or 100-foot) intervals within the 400-foot study corridor. Soil from both excavation types is screened by field technicians through .25-inch wire mesh to ensure the recovery of relatively small artifacts. A series of notes are taken regarding observations made during the testing. All soil is collected on pieces of tarp, and immediately redeposited back into the excavated hole, and tamped down by foot or using a shovel. If possible, the sod is retained intact and replaced at the top of the hole. If Test Units take more than one day to excavate, they will be covered with plywood and marked with orange fencing. Only hand tools are employed in this testing; no mechanical apparatus will be used.

- Artifacts recovered by this method are usually prehistoric waste-flakes from stone tool production, small or broken stone tools, fire-cracked rock from ancient hearths, and a variety of historic debris (round and square nails, broken glass, broken kitchenware, etc.). Artifacts are temporarily removed from the area by URS archaeologists for analysis and documentation, but the landowner in all cases has rights of ownership. Following submittal and review of the reports by state agencies, the landowner will be contacted with a description of the items retained from his property, and will be given the option of having them returned at no expense, or of donating them for curation at a state facility.

- The boundaries of all cultural resources and relevant landscape features will be explicitly defined and mapped using GPS devices. Detailed notes will be taken regarding the setting and internal characteristics of each resource.

- Above-ground resources, such as standing historic structures, within view of the proposed undertaking will be photographed from the public right of way (whenever possible) and their locations identified on maps. In a few cases, surveyors may need to enter property to photograph buildings that are not visible from the public right of way. Following review of these data by URS architectural historians, those exhibiting potential cultural significance will be revisited by the architectural historians for further assessment, following acquisition of permission for access from the landowner.

For questions regarding field methods, contact Andrew Wyatt for Pennsylvania and Grace Ziesing for New Jersey

Andrew Wyatt
URS Corporation
4507 North Front Street, Suite 200
Harrisburg, PA 17110
Phone: (717) 635-7842
Fax: (717) 635-7902
Cell: (717) 380-7836
andrew.wyatt@urs.com

Grace Ziesing
Senior Archaeologist
URS Corporation
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428
Direct: 610- 832-2791
Grace_Ziesing@urs.com

September 24, 2015

Jesse Bergevin, Historian
Oneida Indian Nation
2037 Dream Catcher Plaza
Oneida, NY 13421

Re: Phase I Archaeological Survey Reports
PennEast Pipeline Project, Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania, Hunterdon and Mercer Counties, New Jersey

Dear Mr. Bergevin:

On behalf of PennEast Pipeline Company, LLC, (PennEast) and as requested in your letter dated January 20, 2015, URS is submitting Phase I archaeological survey reports for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). The reports detail archaeological survey conducted in 2014 and 2015 on the preferred alignment in Pennsylvania and New Jersey. The Phase I survey identified 18 archaeological sites and five isolated finds in Pennsylvania and six archaeological sites and 11 isolated finds in New Jersey. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, and proposed treatments for each of these resources are contained in the reports.

I look forward to receiving your comments on the reports. In the meantime, should you have any questions regarding the report for Pennsylvania, please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com. If you have any questions on the report for New Jersey, please contact Grace Ziesing at 610.832.2791 or at grace.ziesing@urs.com.

Sincerely,

URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)

Fedex Tracking Number 774588193540

RECORD OF CONVERSATION

February 24, 2016, 10:15 am

Andrew Wyatt, AECOM Senior Archaeologist (andrew.wyatt@aecom.com)
Jessie Bergevin, Oneida Nation Cultural Resource Specialist (jbergevin@oneida-nation.org)

Mr. Bergevin called Andrew Wyatt for an update on the PennEast archaeological survey in the northern portion of the project area in Pennsylvania. Mr. Bergevin asked if any Native American sites had been found in Luzerne County. Wyatt replied that only one isolated find had been identified in Luzerne County and that was reported in the Phase I archaeological survey report sent to Mr. Bergevin in September 2015. Wyatt also informed Mr. Bergevin that he would be receiving an addendum to that report in early March that includes information on Native American sites found within the study corridor on the Susquehanna floodplain and the Lehigh River. Mr. Bergevin replied that he looked forward to receiving the report, but that sites on the Lehigh River may be of greater concern to the Delaware Tribe of Indians. Wyatt responded that the same report will be sent to the Delaware Tribe of Indians for their review. Mr. Bergevin asked if any stacked stone features had been identified. Wyatt responded that none had been found. Mr. Bergevin thanked Wyatt for the information, and Wyatt thanked Mr. Bergevin for his continued interest in the project.

March 28, 2016

Jesse Bergevin, Historian
Oneida Indian Nation
2037 Dream Catcher Plaza
Oneida, NY 13421

Re: FERC Docket # CP15-558-000
Phase I Archaeological Survey Report, PennEast Pipeline Project, Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania. Addendum 1.

Dear Mr. Bergevin:

On behalf of PennEast Pipeline Company, LLC, (PennEast) and as requested in your letter dated January 20, 2015, URS is submitting an addendum to the Phase I Archaeological Survey Report for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). This addendum details archaeological survey conducted between July 2015 and February 2016 on the preferred alignment and associated facilities. The Phase I survey identified eight archaeological resources within or adjacent to the area of potential effects (APE) for the preferred alignment. The addendum also includes the results of Phase I survey on areas that are no longer included on the preferred alignment. Phase I survey in these areas identified 12 archaeological resources. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, and proposed treatments for each of these resources are contained in the report.

I look forward to receiving your comments on the reports. In the meantime, should you have any questions regarding the report, please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com.

Sincerely,

URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)

Fedex Tracking Number 7759 7605 0159

Native American Consultations- Oneida Indian Nation of Wisconsin

December 31, 2014

Ed Delgado, Chairman
Oneida Nation of Wisconsin
P.O. Box 365
Oneida, WI 54155-0365

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Delgado,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215696966

December 31, 2014

Corina Williams, THPO
Oneida Nation of Wisconsin
P.O. Box 365
Oneida, WI, 54155-0365

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Williams,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215696973

Native American Consultations - Onondaga Nation

December 31, 2014

Tony Gonyea, Faithkeeper
Onondaga Nation
RR #1 Box 245
Onondaga Nation
Via Nedrow, NY 13120

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Gonyea,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites,

buildings, structures, or objects that are included in or eligible for inclusion in the National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215696980

LETTER OF TRANSMITTAL

625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428
TEL: 610.832.2791 FAX: 610.832.3501
grace.ziesing@aecom.com

DATE: February 9, 2015

REFERENCE: PennEast Pipeline Project
Letter to Onondaga Nation

TO: Tony Gonyea, Faithkeeper
c/o Bev Lyons
Onondaga Nation
3951 Route 11
Nedrow, New York 13120

WE ARE SENDING:

☒ *Herewith* ☐ *Under Separate Cover*

☐ Shop Drawings ☐ Prints ☐ Plans ☐ Report ☐ Specifications ☐ Copy of Letter

☒ Other: Letter

☒ For Review ☐ For Reference ☐ As Requested ☐ For Comment ☐ For Correction ☐ Resubmit

Copies	Date	Description
1	December 31, 2014	Letter and maps introducing PennEast Pipeline Project

SENT VIA: ☐ *Our Messenger* ☒ *FedEx/Airborne* ☐ *Certified Mail* ☐ *As Noted Below*
☐ *Your Messenger* ☐ *United Parcel* ☐ *First Class Mail*

NOTES: Enclosed please find a copy of the letter originally sent on December 31, 2014. We are re-sending because delivery has not been confirmed through USPS certified mail. We are now sending via FedEx to a street address.

Copy to:
File

Sincerely,
URS Corporation

Grace H. Ziesing
Senior Archaeologist

FedEx Tracking No. 772865458552

Native American Consultations - Seneca-Cayuga Tribe of Oklahoma

December 31, 2014

LeRoy Howard, Chief
Seneca-Cayuga Tribe of Oklahoma
23701 S. 655 Road
Grove, OK 74344

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Chief Howard,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70111570000209367344

December 31, 2014

Paul Barton, Historic Preservation Officer
Seneca-Cayuga Tribe of Oklahoma
23701 South 655 Road
Grove, OK 74344

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Barton,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70111570000209367351

Native American Consultations - Seneca Nation of Indians

December 31, 2014

Beverly Cook, President
Seneca Nation of Indians
P.O. Box 231
Salamanca, NY 14779

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Cook,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

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- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215647357

December 31, 2014

Melissa Bach, THPO
Seneca Nation of Indians
Tribal Historic Preservation Office
90 O:hi'yoh Way
Salamanca, NY 14779

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Bach,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772431409073

From: Holcomb, Bernard
To: Wyatt, Andrew; Ziesing, Grace
Subject: FW: PennEast P[ipe line Projectt/106 review/Seneca Nation
Date: Thursday, February 19, 2015 5:09:23 PM

Bernie Holcomb, PWS
Pipeline Environmental Services Manager
Direct: 1-610-832-1810 Cell: 1-215-275-7956
bernard.holcomb@aecom.com

AECOM
625 West Ridge Pike, Suite E-100 Conshohocken, Pennsylvania 19428
Telephone: 610-832-3500 Fax: 610-832-3501
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Please consider the environment before printing this e-mail.

From: Jay Toth [mailto:jay.toth@sni.org]
Sent: Thursday, February 19, 2015 1:59 PM
To: Holcomb, Bernard
Cc: Scott Abrams
Subject: PennEast P[ipe line Projectt/106 review/Seneca Nation

URS

Seneca Nation Historic Preservation office has no issues regarding the PennEast Pipeline Project project. We will defer to The Delaware Nation as the primary representative for that area.

Seneca Nation has no further issues if the proposed PA and NJ SHPO plans are followed. However, if at any time your scope of work changes or cultural/burial sites are located, please notify our office as soon as possible.

Thanks

JAY toth., MA., MS.
Seneca Nation Tribal archeologist
90 OHI:WAY
Salamanca, NY 14779

Native American Consultations - Shawnee Tribe

December 31, 2014

Kim Jumper, THPO
Shawnee Tribe of Oklahoma
Historic Preservation Department
29 South Highway 69A
Miami, Oklahoma 74354

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. Jumper,

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Sincerely
URS Corporation,



Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772430268508

December 31, 2014

Ron Sparkman, Chairman
Shawnee Tribe
29 South Highway 69A
Miami, Oklahoma 74354

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Sparkman,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772430271824

From: Wyatt, Andrew
To: "kim.jumper@shawnee-tribe.com"
Cc: Holcomb, Bernard; Ziesing, Grace
Subject: PennEast Pipeline Project Section 106 Consultation Request
Date: Wednesday, February 18, 2015 3:26:00 PM
Attachments: Shawnee Tribe_Jumper_12-31-2014.pdf

Dear Ms. Jumper,

I am writing on behalf of PennEast Pipeline Company, LLC, to follow up on a letter (copy attached) sent to you on December 31, 2014. This letter introduced the PennEast Project, requested the Shawnee Tribe's comments regarding cultural resources and its participation as an interested party. The same letter was sent to Mr. Ron Sparkman, Chairman, Shawnee Tribe. We respectfully request a formal response via letter or email. Please let me know if you need further information before providing your response.

Sincerely,

Andrew Wyatt, M.A.
Senior Archaeologist
D 1-717-635-7942 C 1-717-380-7836
andrew.wyatt@aecom.com

AECOM
4507 Front Street, Suite 200
Harrisburg, Pennsylvania 17110
T 1-717-635-7901 F 1-717-635-7902
www.aecom.com

From: Kim Jumper
To: Wyatt, Andrew
Subject: RE: PennEast Pipeline Project Section 106 Consultation Request
Date: Thursday, February 19, 2015 4:53:14 PM

This letter is in response to the above referenced project.

The Shawnee Tribe's Tribal Historic Preservation Department concurs that no known historic properties will be negatively impacted by this project. We have no issues or concerns at this time, but in the event that archaeological materials are encountered during construction, use, or maintenance of this location, please re-notify us at that time as we would like to resume consultation under such a circumstance.

Thank you for giving us the opportunity to comment on this project.

Sincerely,
Kim Jumper, THPO
Shawnee Tribe

From: Wyatt, Andrew [mailto:andrew.wyatt@aecom.com]
Sent: Wednesday, February 18, 2015 2:27 PM
To: kim.jumper@shawnee-tribe.com
Cc: Holcomb, Bernard; Ziesing, Grace
Subject: PennEast Pipeline Project Section 106 Consultation Request

Dear Ms. Jumper,

I am writing on behalf of PennEast Pipeline Company, LLC, to follow up on a letter (copy attached) sent to you on December 31, 2014. This letter introduced the PennEast Project, requested the Shawnee Tribe's comments regarding cultural resources and its participation as an interested party. The same letter was sent to Mr. Ron Sparkman, Chairman, Shawnee Tribe. We respectfully request a formal response via letter or email. Please let me know if you need further information before providing your response.

Sincerely,

Andrew Wyatt, M.A.
Senior Archaeologist
D 1-717-635-7942 C 1-717-380-7836
andrew.wyatt@aecom.com

AECOM
4507 Front Street, Suite 200

Harrisburg, Pennsylvania 17110
T 1-717-635-7901 F 1-717-635-7902
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Native American Consultations - Stockbridge-Munsee Band of Mohicans

December 31, 2014

Sherry White, THPO
Stockbridge-Munsee Band of the Mohicans
W13447 Camp 14 Road
Bowler, Wisconsin 54416

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Ms. White,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215647364

December 31, 2014

Robert Chicks, Tribal President
Stockbridge-Munsee Band of the Mohicans
Route 1
P.O. Box 70
Bowler, Wisconsin 54416

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Chicks,

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

December 31, 2014

Greg Bunker
Stockbridge-Munsee Band of the Mohicans
W13447 Camp 14 Road
Bowler, Wisconsin 54416

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Bunker,

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Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215647388

From:	Holcomb, Bernard
To:	Wyatt, Andrew; Ziesing, Grace
Cc:	West, Jonathan; Brown, Lauren E
Subject:	FW: PennEast Tribal consultation
Date:	Tuesday, January 27, 2015 12:26:46 PM

Please circle back - Thanks

Bernie Holcomb, PWS
Pipeline Environmental Services Manager
Direct: 1-610-832-1810 Cell: 1-215-275-7956
bernard.holcomb@aecom.com

AECOM
625 West Ridge Pike, Suite E-100 Conshohocken, Pennsylvania 19428
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Please consider the environment before printing this e-mail.

From: Bonney Hartley [mailto:Bonney.Hartley@mohican-nsn.gov]
Sent: Tuesday, January 27, 2015 12:26 PM
To: Holcomb, Bernard
Subject: PennEast Tribal consultation

Dear Mr. Holcomb:

We received a letter on 1/5/15 from your office requesting our consultation under Section 106 for the Penn East Pipeline project.

We wish to continue consultation for this project. Our area of interest according to the current design plans is the portion in Bucks County, PA where the project crosses the Delaware River.

I would like to request the following information at this time:

- Copy of the Field Survey Protocols

Thank you,

Bonney Hartley
Tribal Historic Preservation Assistant- NY Office

Stockbridge-Munsee Mohican Tribal Historic Preservation
P.O. Box 718
Troy NY 12181
(518) 326-8870 office
(518) 888-6641 cell
Bonney.Hartley@mohican-nsn.gov

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From:	Wyatt, Andrew
To:	Bonney.Hartley@mohican-nsn.gov
Cc:	Holcomb, Bernard; Ziesing, Grace
Subject:	PennEast Pipeline Project-Archaeological Survey Protocol
Date:	Wednesday, February 04, 2015 10:26:12 AM
Attachments:	PennEast Archaeology Survey Methods.pdf

Dear Mrs. Hartley,

Thank you for response to our initial request for the views of the Stockbridge-Munsee Band of the Mohicans. Attached is a copy of our archaeological field survey methods that you requested in your email to Bernard Holcomb dated January 27, 2015.
These methods were approved by the Pennsylvania Historical and Museum Commission by letter dated September 10, 2014. Approval by the New Jersey Historic Preservation Office is pending.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

Andrew Wyatt, M.A.
Senior Archaeologist
D 1-717-635-7942 C 1-717-380-7836
andrew.wyatt@aecom.com

AECOM
4507 Front Street, Suite 200
Harrisburg, Pennsylvania 17110
T 1-717-635-7901 F 1-717-635-7902
www.aecom.com

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PENNEAST PIPELINE PROJECT
ARCHAEOLOGICAL SURVEY METHODS

Archaeology team members will employ standard archaeological survey methods in order to test proposed pipeline land requirements for the presence of archaeological sites. These methods include:

- **Visual pedestrian survey** (walkover) of the entire 400-foot wide study corridor, as well as extra workspaces. A crew of up to 11 field archaeologists will make observations regarding terrain, vegetation, and surface anomalies. The crew will walk the study corridor at a set interval and inspect the exposed ground surface to identify artifacts.

- **Shovel testing** of level and nearly level areas within the direct APE. Individual shovel tests are holes dug into the ground surface 50 centimeters (20 inches) in diameter, and typically extending 50 centimeters (20 inches) or less in depth.

- **Test Unit excavation** will be undertaken at a limited number of stream crossings to identify archaeological sites that may be buried below a depth of approximately 75 centimeters (~2.5 feet) below ground surface. Test Units will measure 1.0 x 1.0 meters (3.3 x 3.3 feet) on a side and may extend up to 1.5 meters (~five feet) deep.

- Shovel testing and Test Units are excavated at 15- or 30-meter (~50- or 100-foot) intervals within the 400-foot study corridor. Soil from both excavation types is screened by field technicians through .25-inch wire mesh to ensure the recovery of relatively small artifacts. A series of notes are taken regarding observations made during the testing. All soil is collected on pieces of tarp, and immediately redeposited back into the excavated hole, and tamped down by foot or using a shovel. If possible, the sod is retained intact and replaced at the top of the hole. If Test Units take more than one day to excavate, they will be covered with plywood and marked with orange fencing. Only hand tools are employed in this testing; no mechanical apparatus will be used.

- Artifacts recovered by this method are usually prehistoric waste-flakes from stone tool production, small or broken stone tools, fire-cracked rock from ancient hearths, and a variety of historic debris (round and square nails, broken glass, broken kitchenware, etc.). Artifacts are temporarily removed from the area by URS archaeologists for analysis and documentation, but the landowner in all cases has rights of ownership. Following submittal and review of the reports by state agencies, the landowner will be contacted with a description of the items retained from his property, and will be given the option of having them returned at no expense, or of donating them for curation at a state facility.

- The boundaries of all cultural resources and relevant landscape features will be explicitly defined and mapped using GPS devices. Detailed notes will be taken regarding the setting and internal characteristics of each resource.

- Above-ground resources, such as standing historic structures, within view of the proposed undertaking will be photographed from the public right of way (whenever possible) and their locations identified on maps. In a few cases, surveyors may need to enter property to photograph buildings that are not visible from the public right of way. Following review of these data by URS architectural historians, those exhibiting potential cultural significance will be revisited by the architectural historians for further assessment, following acquisition of permission for access from the landowner.

For questions regarding field methods, contact Andrew Wyatt for Pennsylvania and Grace Ziesing for New Jersey

Andrew Wyatt
URS Corporation
4507 North Front Street, Suite 200
Harrisburg, PA 17110
Phone: (717) 635-7842
Fax: (717) 635-7902
Cell: (717) 380-7836
andrew.wyatt@urs.com

Grace Ziesing
Senior Archaeologist
URS Corporation
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428
Direct: 610- 832-2791
Grace_Ziesing@urs.com

September 24, 2015

Bonney Hartley, THPO
Stockbridge-Munsee Mohican Tribal Historic Preservation
75 First Street
Troy, NY 12180

Re: Phase I Archaeological Survey Reports
PennEast Pipeline Project, Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania, Hunterdon and Mercer Counties, New Jersey

Dear Ms. Hartley:

On behalf of PennEast Pipeline Company, LLC, (PennEast) and as promised in our conference call of April 9, 2015, URS is submitting Phase I archaeological survey reports for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). The reports detail archaeological survey conducted in 2014 and 2015 on the preferred alignment in Pennsylvania and New Jersey. The Phase I survey identified 18 archaeological sites and five isolated finds in Pennsylvania and six archaeological sites and 11 isolated finds in New Jersey. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, and proposed treatments for each of these resources are contained in the reports.

I look forward to receiving your comments on the reports. In the meantime, should you have any questions regarding the report for Pennsylvania, please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com. If you have any questions on the report for New Jersey, please contact Grace Ziesing at 610.832.2791 or at grace.ziesing@urs.com.

Sincerely,

URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)

Fedex Tracking Number 774588814160

Stockbridge-Munsee Tribal Historic Preservation

Main Office
W13447 Camp 14 Rd
Bowler, WI 54416

New York Office
65 First Street
Troy, NY 12180

Ms. Kimberley Bose
Federal Energy Regulatory Commission
888 First Street NE
Washington DC 20426
via e-file only

October 26, 2015

RE: PennEast Pipeline Project / CP15-558-000
Luzerne County PA to Mercer County NJ
Comments by Stockbridge-Munsee Mohican Tribe

Dear Ms. Bose:

I am in receipt of project materials for the PennEast project sent by URS Corporation on 9/24/15 and by PennEast on 10/9/15. We have reviewed the materials per our cultural resource responsibilities for Section 106 of the National Historic Preservation Act and are replying to you as the Federal contact for the project in keeping with our Government-to-Government consultation.

On behalf of the Stockbridge-Munsee Mohican Tribe, I offer the following comments:

- Re: Phase 1 Archeological Survey Reports- As previously stated in our comment letter dated 3/26/15, our cultural area of interest for the project is the Delaware River basin area in Bucks County. We understand that no archeological materials were found on the riverbank area, and that the method for the pipeline is HDD extending below the depth of any unknown cultural resources. Therefore, we do not have further cultural resource concerns with this segment in our interest area.
- Though Northampton County is not in our primary area of interest, we would like to note our concurrence with the treatment plan for one site (36NM0330) that is adjacent to the APE. We agree that the site should be monitored during construction and have a protective fencing barrier.
- Further, we would like to note that the Phase 1 states it covers 72% of the total length. Therefore, we wish to continue consultation by receiving the addendum reports for the remainder of the testing area.

Thank you for your review of the comments of Stockbridge-Munsee Mohican Tribe.

Kind regards,

B. Hartley

Bonney Hartley
Tribal Historic Preservation Officer
New York Office

Cc: Andrew Wyatt, URS *via email only*

(518) 244-3164 *Email: bonney.hartley@mohican-nsn.gov*

March 28, 2016

Bonney Hartley, THPO
Stockbridge-Munsee Tribal Historic Preservation
Stockbridge-Munsee Band of Mohicans
65 First Street
Troy, NY 12180

Re: Phase I Archaeological Survey Reports
PennEast Pipeline Project, Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania, Hunterdon and Mercer Counties, New Jersey

Dear Ms. Hartley:

On behalf of PennEast Pipeline Company, LLC, (PennEast) and as promised in our conference call of April 9, 2015, URS is submitting an addendum to the Phase I Archaeological Survey Report for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). This addendum details archaeological survey conducted between July 2015 and February 2016 on the preferred alignment and associated facilities. The Phase I survey identified eight archaeological resources within or adjacent to the area of potential effects (APE) for the preferred alignment. The addendum also includes the results of Phase I survey on areas that are no longer included on the preferred alignment. Phase I survey in these areas identified 12 archaeological resources. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, and proposed treatments for each of these resources are contained in the report.

I look forward to receiving your comments on the reports. In the meantime, should you have any questions regarding the report, please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com.

Sincerely,

URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)

Fedex Tracking Number 7759 7564 7987

From: Bonney Hartley <Bonney.Hartley@mohican-nsn.gov>
Sent: Thursday, April 21, 2016 3:34 PM
To: medha.kochhar@ferc.gov
Cc: Wyatt, Andrew
Subject: Penn East Pipeline- Phase 1 Reports

Dear Ms. Kochhar:

I understand you are the FERC project manager for the Penn East Pipeline Project. I am writing to you as the Federal contact with my comments in keeping with Government-to-Government protocol of Section 106.

On behalf of Stockbridge Munsee Mohican Tribe I have the following comments:

- I have completed review of the Phase 1 Archeological Survey Reports sent by Andrew Wyatt of URS on March 28, 2016. I note that the survey identified 8 archeological resources within or adjacent to the APE and that most of the sites are recommended for avoidance to be fenced off during construction.
- In addition, however, two sites (36LU0110 and 36LU0337) are not recommended for avoidance and appear to be culturally significant. From my perspective, they warrant further testing to recommend them for eligibility for the National Register. I ask that further examination of these sites take place and to receive the findings.

Kind regards,
Bonney

Bonney Hartley
Tribal Historic Preservation Officer
Stockbridge-Munsee Mohican Tribal Historic Preservation
New York Office
65 1st Street
Troy, NY 12180
(518) 244-3164
Bonney.Hartley@mohican-nsn.gov
www.mohican-nsn.gov
Physical Address: 37 1st Street

August 19, 2016

Bonney Hartley, THPO
Stockbridge-Munsee Tribal Historic Preservation
Stockbridge-Munsee Band of Mohicans
65 First Street
Troy, NY 12180

Re: Phase I Archaeological Survey Reports
PennEast Pipeline Project, Luzerne, Carbon, Northampton, and Bucks Counties, Pennsylvania, Hunterdon and Mercer Counties, New Jersey

Dear Ms. Hartley:

On behalf of PennEast Pipeline Company, LLC, (PennEast) and as promised in our conference call of April 9, 2015, URS is submitting a second addendum to the Phase I Archaeological Survey Report for the PennEast Pipeline Project (Project) for your review and comment. As an interstate natural gas pipeline, the Project will be regulated by the Federal Energy Regulatory Commission (FERC). This addendum details archaeological survey conducted between February 2016 and June 2016 on the preferred alignment and associated facilities as well as on route deviations that may be incorporated into the preferred alignment at a later date. Phase I survey identified six archaeological sites and one isolated find in the APE for the preferred alignment and in two potential route deviations that may be incorporated into the preferred alignment at a later date. Our recommendations on National Register of Historic Places (NRHP) eligibility, the need for further investigation, avoidance plans, and Phase II workplans are included in the report.

I look forward to receiving your comments on the reports. In the meantime, should you have any questions regarding the report, please feel free to contact me at 717.635.7942 or at andrew.wyatt@urs.com.

Sincerely,

URS Corporation
Andrew Wyatt, Senior Archaeologist
4507 North Front Street, Suite 200
Harrisburg, PA 17110

cc: Jeff England (UGI)
Bernard Holcomb (URS)

Fedex Tracking Number 7770 2795 8706

Native American Consultations - St. Regis Mohawk Tribe

December 31, 2014

Chief Randy Hart
St. Regis Mohawk Tribe
412 State Route 37
Hogansburg, NY 13655

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Chief Hart,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215647395

December 31, 2014

Ken Jocks, Director
Environmental Division
St. Regis Mohawk Tribe
RR #1, Box 8a
Hogansburg, NY 13655

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Jocks,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites,

buildings, structures, or objects that are included in or eligible for inclusion in the National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

December 31, 2014

Arnold Printup
Historic Preservation Officer
St. Regis Mohawk Tribe
412 State Route 37
Hogansburg, NY 13655

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Mr. Printup,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites,

buildings, structures, or objects that are included in or eligible for inclusion in the National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

USPS Tracking No. 70121010000215647418

From:	Wyatt, Andrew
To:	Arnold Printup, THPO
Cc:	Holcomb, Bernard; Ziesing, Grace
Subject:	PennEast Pipeline Project Section 106 Consultation Request
Date:	Friday, February 20, 2015 9:53:00 AM
Attachments:	St. Regis Mohawk Tribe_Printup_12-31-2014.pdf

Mr. Printup,

As per our telephone conversation yesterday, attached please find a copy of the Project Information Letter that was mailed to you on December 31, 2014. We look forward to your response on behalf of the St. Regis Mohawk Tribe. If you need additional information on the project, please do not hesitate to contact me.

Sincerely,

Andrew Wyatt, M.A.
Senior Archaeologist
D 1-717-635-7942 C 1-717-380-7836
andrew.wyatt@aecom.com

AECOM
4507 Front Street, Suite 200
Harrisburg, Pennsylvania 17110
T 1-717-635-7901 F 1-717-635-7902
www.aecom.com

From:	Holcomb, Bernard
To:	West, Jonathan; Wyatt, Andrew; Brown, Lauren E
Subject:	FW: PennEast Pipeline Company , LLC FERC Process Participation Request
Date:	Wednesday, February 25, 2015 7:01:12 AM

Bernie Holcomb, PWS
Pipeline Environmental Services Manager
Direct: 1-610-832-1810 Cell: 1-215-275-7956
bernard.holcomb@aecom.com

AECOM
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Please consider the environment before printing this e-mail.

-----Original Message-----
From: Arnold Printup [mailto:arnold.printup@srmt-nsn.gov]
Sent: Tuesday, February 24, 2015 2:23 PM
To: Holcomb, Bernard
Subject: PennEast Pipeline Company , LLC FERC Process Participation Request

She:kon Mr.Holcomb,

On behalf of the Saint Regis Mohawk Tribe and the Tribal Historic Preservation Office we would like to formally request to participate in the Section 106 process in regards to the PennEast Pipeline Company Project.
Please let me know if anything further is needed from this office.

Nia:wen,

Arnold L Printup
Saint Regis Mohawk Tribe
Tribal Historic Preservation Office

From: Wyatt, Andrew
To: Arnold Printup, THPO
Cc: Holcomb, Bernard; Ziesing, Grace
Subject: FW: PennEast Pipeline Company , LLC FERC Process Participation Request
Date: Wednesday, February 25, 2015 9:27:00 AM

Dear Mr. Printup,

Thank you for your response to our request for Section 106 consultation. As part of this consultation, is the Saint Regis Mohawk Tribe or the Tribal Historic Preservation Office aware of any historic properties that are of religious or cultural significance to the Tribe that may be affected by the project?

Sincerely,

Andrew Wyatt, M.A.
Senior Archaeologist
D 1-717-635-7942 C 1-717-380-7836
andrew.wyatt@aecom.com

AECOM
4507 Front Street, Suite 200
Harrisburg, Pennsylvania 17110
T 1-717-635-7901 F 1-717-635-7902
www.aecom.com

-----Original Message-----
From: Arnold Printup [mailto:arnold.printup@srmt-nsn.gov]
Sent: Tuesday, February 24, 2015 2:23 PM
To: Holcomb, Bernard
Subject: PennEast Pipeline Company , LLC FERC Process Participation Request

She:kon Mr.Holcomb,

On behalf of the Saint Regis Mohawk Tribe and the Tribal Historic Preservation Office we would like to formally request to participate in the Section 106 process in regards to the PennEast Pipeline Company Project.
Please let me know if anything further is needed from this office.

Nia:wen,

Arnold L Printup
Saint Regis Mohawk Tribe
Tribal Historic Preservation Office

Native American Consultations - Tonawanda Seneca Nation

December 31, 2014

Chief Darwin Hill
Tonawanda Seneca Nation
7027 Meadville Road
Basom, NY 14013

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Chief Hill,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the

National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772430681090

From:	Wyatt, Andrew
To:	"tonseneca@aol.com"
Cc:	Holcomb, Bernard; Ziesing, Grace
Subject:	PennEast Pipeline Project Section 106 Consultation Request
Date:	Wednesday, February 18, 2015 2:43:00 PM
Attachments:	Towanda Seneca Nation_Hill_12-31-2015.pdf

Dear Chief Hill,

I am writing on behalf of PennEast Pipeline Company, LLC, to follow up on a letter (copy attached) sent to you on December 31, 2014. This letter introduced the PennEast Project, requested the Tonawanda Seneca Nation's comments regarding cultural resources and its participation as an interested party. We respectfully request a formal response via letter or email.

Please let me know if you need further information before providing your response.

Sincerely,

Andrew Wyatt, M.A.
Senior Archaeologist
D 1-717-635-7942 C 1-717-380-7836
andrew.wyatt@aecom.com

AECOM
4507 Front Street, Suite 200
Harrisburg, Pennsylvania 17110
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Native American Consultations -Tuscarora Nation

December 31, 2014

Leo Henry, Chief
c/o Tuscarora Nation Chiefs Council
Neil Patterson, Jr., Director
Tuscarora Nation Environmental Program
2045 Upper Mountain Road
Tuscarora Nation
Sanborn, NY 14132

RE: PennEast Pipeline Company, LLC
Proposed PennEast Pipeline Project: Bucks, Northampton, Carbon, and Luzerne, Counties, Pennsylvania; Hunterdon and Mercer Counties, New Jersey
FERC Process Participation Request

Dear Chief Henry,

PennEast Pipeline Company, LLC (PennEast) is proposing the PennEast Pipeline Project, which is designed to bring lower cost natural gas produced in the Marcellus Shale region in eastern Pennsylvania to homes and businesses in Pennsylvania and New Jersey. The Project facilities include a 36-inch diameter, approximately 110-mile pipeline, extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. The Project will extend from various receipt point interconnections in the eastern Marcellus region, including interconnections with Transcontinental Gas Pipe Line Company, LLC (Transco) and gathering systems operated by Williams Partners L.P., Regency Energy Partners LP, and UGI Energy Services, LLC, all in Luzerne County, Pennsylvania, to various delivery point interconnections in the heart of major northeastern natural gas-consuming markets, including interconnections with UGI Utilities, Inc. (UGI) in Carbon County, Pennsylvania and Northampton County, Pennsylvania, respectively, Columbia Gas Transmission, LLC (Columbia Gas) in Northampton County, and Elizabethtown Gas, Texas Eastern Transmission, LP (Texas Eastern) and Algonquin Transmission, LLC, all in Hunterdon, New Jersey. The terminus of the proposed PennEast system will be located at a delivery point with Transco in Mercer County, New Jersey. Two alternative routes are under evaluation in New Jersey.

As a federally regulated utility under FERC regulations, we expect the PennEast Pipeline Project to be evaluated under the National Environmental Policy Act (NEPA) as part of the FERC certification process. The project will be regulated by the FERC under Section 7(c) of the Natural Gas Act (15 USC 717). These regulations require federal agencies such as FERC to consult with federally recognized Indian tribes as a part of the NEPA process. Pursuant to the certificate regulations, PennEast, as a non-federal representative

of the FERC, is obligated under Section 106 of the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C 470 *et seq*., as amended through 2000) to consider the effects of this undertaking upon any historic properties, which are defined as districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the National Register of Historic Places (NRHP). As representatives of FERC, PennEast and its consultant, URS, respectfully request your participation as an interested party regarding the proposed PennEast Project and seeks your input on any cultural resources that you may be aware of or have concerns about that are within the project boundaries and for which you have jurisdiction. We have coordinated with the Pennsylvania Museum and Historic Commission (PMHC) and New Jersey State Historic Preservation Office (NJ SHPO) and obtained their respective approvals for field survey protocols. Field investigations are ongoing.

The following are enclosed to facilitate your review:

- Project overview map with project alignment;
- USGS 7.5 minute quadrangle maps with project areas.

On behalf of UGI, URS will provide documentation of the responses of the participating agencies and stakeholders to FERC and would appreciate a formal response via letter or email confirming or declining your group's participation. If you have any questions regarding the project, please contact me by letter, by telephone at (610) 832-1810, or by email at bernard.holcomb@urs.com.

Sincerely
URS Corporation,

Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772430317635

December 31, 2014

Bryan Printup
c/o Tuscarora Nation Chiefs Council
Neil Patterson, Jr., Director
Tuscarora Nation Environmental Program
2045 Upper Mountain Road
Tuscarora Nation
Sanborn, NY 14132

RE: PennEast Pipeline Company, LLC
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Sincerely
URS Corporation,



Bernard Holcomb
Pipeline Environmental Services Manager
625 West Ridge Pike, Suite E-100
Conshohocken, PA 19428

Enclosures

cc: Jeff England – UGI

FedEx Tracking No. 772430320469

From:	Wyatt, Andrew
To:	"tonseneca@aol.com"
Cc:	Holcomb, Bernard; Ziesing, Grace
Subject:	PennEast Pipeline Project Section 106 Consultation Request
Date:	Wednesday, February 18, 2015 2:43:00 PM
Attachments:	Towanda Seneca Nation_Hill_12-31-2015.pdf

Dear Chief Hill,

I am writing on behalf of PennEast Pipeline Company, LLC, to follow up on a letter (copy attached) sent to you on December 31, 2014. This letter introduced the PennEast Project, requested the Tonawanda Seneca Nation's comments regarding cultural resources and its participation as an interested party. We respectfully request a formal response via letter or email.

Please let me know if you need further information before providing your response.

Sincerely,

Andrew Wyatt, M.A.
Senior Archaeologist
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andrew.wyatt@aecom.com

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