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December 27, 2017

Joseph J. Buczynski, P.E.  
Environmental Program Manager  
Pennsylvania Department of Environmental Protection  
Waterways and Wetlands Program  
2 Public Square  
Wilkes-Barre, PA 18701-1915

Re: PennEast Pipeline Company, LLC  
Request for Extension  
DEP Application Nos. E40-780, E13-185, E48-435, E09-998, and ESG02000160001  
Luzerne County, Carbon County, Northampton County, and Bucks County

Dear Mr. Buczynski:

On behalf of PennEast Pipeline Company, LLC (PennEast), AECOM respectfully submits this request for extension to respond to the Pennsylvania Department of Environmental Protection's (PADEP) December 23, 2016 Incompleteness Review Letters for the PennEast Pipeline Project (Project). On June 26, 2017, PennEast submitted a request to extend the timeline to submit the necessary information to make the four Chapter 105 Joint Permit Applications (JPA) and one Erosion and Sediment Control General Permit (ESCGP) application complete and technically adequate. Due to unanticipated delays in the FERC review process that are beyond PennEast's control, PennEast does not yet have the legal authority to conduct surveys on 100% of the Project workspace, thus deeming a project "administratively complete" as per PADEP standards. In June 2017, PennEast presumed that a quorum at FERC would be restored quickly enabling the issuance of the Certificate of Public Convenience and Necessity (Certificate) in late-summer 2017, and the remaining surveys could be completed and applications revised before December 29, 2017. In its August 10, 2017 letter, the PADEP granted the extension through December 29, 2017.

As you are aware, the FERC faced an unprecedented absence of a quorum for six months, and the quorum was restored in August 2017 after the swearing in of two commissioners. The fifth and final commissioner was sworn in on December 7, 2017. The FERC continues to work through the backlog of project reviews that was created during the six-month inactive period. It has recently issued Certificates for natural gas pipeline projects for which the National Environmental Policy Act (NEPA) review process is complete. PennEast anticipates that the FERC will issue the Certificate for the Project in the near future.

Since its last update, PennEast has continued to refine the Project design, reducing workspace wherever possible near wetlands, watercourses, and within riparian areas, and also addressing requests from other agencies and private landowners that will minimize environmental impacts. Overall, PennEast has reduced the Project footprint by 17% (268 acres) since its February 2016 JPAs and March 2016 ESCGP-2 application. Wetland and watercourse surveys have been completed on 98% of the current Project route in Luzerne County, 94% of the route in Carbon County, 79% of the route in Northampton County, and

88% of the route in Bucks County. PennEast has continued to coordinate with the US Army Corps of Engineers to verify the accuracy of delineations as surveys are completed, and anticipates one final round of site visits after all surveys are complete.

PennEast has also continued to update its JPAs using forms, instructions, and protocols that PADEP has implemented as policy since its February 2016 applications. PennEast acknowledges that the revised applications, which will be submitted as soon as possible after all of the Pennsylvania surveys are complete, will include the application components the PADEP listed in the August 10, 2017 extension letter.

As you can see, PennEast continues to make steady progress in obtaining the information necessary to complete and submit applications.

PennEast respectfully requests a six-month extension to submit complete and technically adequate JPAs and an ESCGP-2 application. PennEast anticipates that six months is sufficient time to gain right-of-entry on currently inaccessible parcels, complete surveys, and update applications, assuming that the FERC issues a Certificate for the Project in early 2018. Weather conditions and snow cover may also influence the anticipated schedule. If any of these external factors, which are beyond PennEast's control, affect the resubmittal schedule, PennEast will consult with the PADEP to discuss the circumstances.

Thank you for your consideration of extending the timeframe to submit complete and technically adequate JPAs and an ESCGP-2 application. We look forward to continuing to work with the PADEP in the coming months. Please feel free to call me at (610) 832-2713 if you need any additional information, particularly pertaining to the percentage of surveys completed to date, agency consultations to date, and PennEast's proposed avoidance, minimization and mitigation measures for anticipated impacts associated with the Project.

Sincerely,

AECOM



Sarah K. Binckley  
Biologist

cc: Mike Dombroskie, US Army Corps of Engineers  
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