



Transcontinental Gas Pipe Line Company, LLC
2800 Post Oak Boulevard (77056)
P.O. Box 1396
Houston, Texas 77251-1396
713/215-2000

August 11, 2022

Kevin S. White | P.E.
Environmental Group Manager
PADEP Regional Permit Coordination Office
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

**RE: REGIONAL ENERGY ACCESS EXPANSION PROJECT
TECHNICAL DEFICIENCY RESPONSE SUBMITTAL
WATER OBSTRUCTION & ENCROACHMENT PERMIT APPLICATION**

**BUCK TOWNSHIP, BEAR CREEK TOWNSHIP, PLAINS TOWNSHIP, JENKINS TOWNSHIP,
KINGSTON TOWNSHIP, DALLAS BOROUGH, WYOMING BOROUGH, WEST WYOMING
BOROUGH & LAFLIN BOROUGH, LUZERNE COUNTY;
PADEP APPLICATION NO. E4083221-006; APS ID NO. 1036224; AUTH ID NO. 1349631**

**ROSS TOWNSHIP, CHESTNUTHILL TOWNSHIP & TUNKHANNOCK TOWNSHIP, MONROE
COUNTY;
DEP APPLICATION NO. E4583221-002; APS ID NO. 1036240; AUTH ID NO. 1349660**

Dear Mr. White;

On April 8, 2021, Transcontinental Gas Pipe Line Company, LLC (Transco), a subsidiary of The Williams Companies, Inc., submitted a Chapter 105 Water Obstruction and Encroachment Application to the Pennsylvania Department of Environmental Protection (PADEP) for the proposed Regional Energy Access Expansion Project (Project). The PADEP issued a technical deficiency letter on January 7, 2022, and Transco responded on March 7, 2022. The PADEP issued a second technical deficiency letter on June 2, 2022. The response package herein responds to PADEP's technical deficiencies outlined in the June 2, 2022 deficiency letter. In respect to Technical Deficiency Comment #1, Transco is still in a concurrent review phase with the United States Fish and Wildlife Service (USFWS) with final clearance pending. Transco will submit the USFWS clearance to PADEP upon receipt.

All Counties

- 1. Provide final reports and final PNDI clearances from applicable agencies and revise the application accordingly. [25 Pa. Code §§ 105.21(a)(1) and 105.24(a)]**

Within both the Luzerne and Monroe County applications, the applicable sections have been updated to reflect the results outlined in the PNDI clearances for the Project. Clearance letters from the Pennsylvania Fish and Boat Commission, Pennsylvania Department of Conservation and Natural Resources, and the Pennsylvania Game Commission are included within Requirement G. Discussion within Requirement G and the Environmental Assessment within Requirement L has been updated accordingly. Transco is still in a concurrent review phase with the United States Fish and Wildlife Service (USFWS) and a final clearance is pending. Transco will submit the final USFWS clearance to PADEP upon receipt.

- 2. Provide final reports and clearances from the Pennsylvania Historical and Museum Commission (PHMC) and update the application accordingly. [25 Pa. Code §§ 105.21(a)(1) and 105.14(b)(5)]**

Transco has completed all cultural studies for the PHMC and clearance has been provided. Letters issued on January 5, 2021, July 9, 2021, September 24, 2021, and November 15, 2021 provide clearance for the initial and Addendum 1 architectural surveys. Letters issued on January 5, 2021 and July 8, 2021 provide clearance for the initial and Addendum 1 archaeological surveys. The February 11, 2022 email from the PHMC clarifies that all project counties/components submitted to that date are included in their clearance statements (some previous response letters did not list all counties). The Addendum 2 studies were the final studies completed for the Project as proposed, and the PHMC issued clearance responses on March 29, 2022 (architecture) and April 21, 2022 (archaeology) for these studies. Updated correspondences and additional reports are included within Requirement D of the Permit Application.

Luzerne County

- 3. Original Comment # 57. S2-T12 does not list any floodway impacts associated with the pipeline or the pipeline construction. Please include in the floodway impacts for S2-T12 on the Impact Drawing Table and the ARIT. [25 Pa. Code § 105.21(a)(1)]**

Provide the impacts to the floodway in the ARIT.

The ARIT, Subfacility Table, and Sheet 31 of the Chapter 105 Drawings for Crossing REL-26 have been updated to show the impact area of the floodway for S2-T12.

- 4. Provide a signed copy of the August 20, 2021 letter from the National Park Service regarding the Captain John Smith Chesapeake National Historic Trail. [25 Pa. Code §§ 105.21(c)(1) and 105.24)]**

A signed copy of the August 20, 2021 letter is included within Appendix 4 of the Joint Permit Application.

- 5. Confirm resource type of S13. This resource is listed as UNT to Shades Creek in the ARIT. However, Photo 13 within Requirement K – Color Photos and Maps indicates that this is a wetland. [25 Pa. Code § 105.21(a)(1)]**

S13-T5 is a stream. The notes in Requirement K - Color Photos and Maps has been updated to address this comment.

- 6. Discuss why the access road (maintenance only) located directly adjacent to the proposed pipeline from MP 2.9 – MP 4.9 is required. Utilization of this access road requires that some resources, such as W96 and S40-T2, be crossed or impacted at two different locations and creates a temporary limit of disturbance greater than 200 linear feet in some locations. [25 Pa. Code § 105.13(e)(1)(viii)]**

Transco proposes to utilize the upland portions of AR-LU-029 during construction and restoration of the Project. Additionally, Transco proposes use of the access road over Meadow Run (S38-T2). Transco proposes to use this access road during construction over Meadow Run with the installation of a Bridge Equipment Crossing that will not include instream supports. Using the access road across Meadow Run during construction is necessary in order to maintain construction access during pipeline installation in this remote portion of the Project. Because the bridge does not require instream supports it will not impact Meadow Run. The Chapter 102 and 105 drawings have been updated to reflect Bridge Equipment Crossing only, with no instream supports.

The remaining resource crossings along the road will only be impacted during construction restoration activities. Those resource crossings along the road include W41-T11, W31-T3, W96-T2, S40-T2, W15B-T5, S8-T5 (Bear Creek), W97-T2, and W34-T3. The Chapter 102 and 105 drawings have been updated to note at these crossings “No Access during pipeline construction. Existing access road use limited to restoration activities in this area”.

Transco is requesting the resource impacts along this access road for restoration activities to minimize impacts to portions of the ROW that will have been stabilized. The existing access road is gravel and parallels the proposed pipeline for over 2 miles in this remote section of the Project. Within the stream and wetland resources along AR-LU-029, existing fords are in place. By utilizing the existing ford with the proposed crossing BMP’s (Timber Mats/Bridge Equipment Crossings) instead of continued access use on the proposed ROW, long-term access impacts to the resources will be concentrated in one location. Use of the existing gravel road will minimize impacts to vegetated upland and wetland areas as well as stream crossing on the pipeline ROW.

- 7. Provide trench plugs at resource W6-T13 (PFO) near station 984+00. [25 Pa. Code § 05.13(e)]**

Trench plugs have been added to W6-T13 at the wetland boundaries near station 984+00 on the E&S Plans.

During review of this crossing, it was noted that W6a-T13 was previously merged with W6-T13 within the application. This error was addressed in the onsite and offsite mitigation plans, impact drawings, ARIT, and Subfacility table by separating the two resources. No change in impact areas or impact types occurred as a result of this correction.

- 8. Update the mitigation plan so that it includes the amount of acreage at each offsite mitigation site being used to offset functional loss in Luzerne County. [25 Pa. Code § 105.13(e)(1)(ix)]**

This mitigation plan narrative and summary table have been updated to clarify mitigation site acreage information.

The PNDI Receipt for the Grajewski site was updated as the previous version was dated September 2020. No impacts were identified on the updated receipt.

- 9. Confirm the presence of an existing culvert crossing at station 599 + 00 and update plans as necessary. [25 Pa. Code § 105.13(e)(1)(i)]**

A culvert is present at this location. The Chapter 102 and 105 Drawings both show a culvert at this location. Transco is proposing to protect the existing culvert with additional matting to prevent

damage to the culvert. An updated photo has been added to the Requirement K Photo Pages and a call out noting "Existing Culvert to be protected with BEC/Matting during Construction" is included on Chapter 102 and 105 drawings.

- 10. Clarify why the WEC/BEC/VCRI crossing of the wetland resources (PSS, EV) at station 1152 + 00 is being proposed when the pipeline will be installed via trenchless technologies and there is an existing adjacent access immediately south of the crossing which does not impact wetland resources. [25 Pa. Code § 105.13(e)(1)(ix)]**

We are not planning to cross wetland resources. Accordingly, we have updated the Chapter 102 and 105 drawings at this location to note "No Disturbance within wetland area". Construction will access via the existing access noted.

Monroe County

- 11. Update the mitigation plan so that it includes the amount of acreage at each offsite mitigation site being used to offset functional loss in Monroe County. [25 Pa. Code § 105.13(e)(1)(ix)]**

This mitigation plan narrative and summary table have been updated to clarify mitigation site acreage information.

The PNDI Receipt for the Grajewski site was updated as the previous version was dated September 2020. No impacts were identified on the updated receipt.

- 12. The impacts to S4-T1-EI-16 as detailed in the ARIT table and the plan drawings are not consistent. Update as necessary. [25 Pa. Code § 105.21(a)(1)]**

The impacts within the ARIT are correct for all crossings. Plan drawing tables were updated for this crossing, as well as several others, as this inconsistency was noted in additional locations on these drawings as well.

- 13. Clarify why the WEC crossing of the wetland resources (PSS, other) at station 885 + 00 is being proposed when the pipeline will be installed via trenchless technologies and there is an existing adjacent access immediately adjacent to the crossing which does not impact wetland resources. [25 Pa. Code § 105.13(e)(1)(ix)]**

We are not planning to cross wetland resources. Accordingly, we have updated the Chapter 102 and 105 drawings at this location to note "No Disturbance within wetland area". Construction will access via the existing access noted.

- 14. Provide documentation that S4-T2 near station 1126 + 00 does not continue through the existing culvert or the existing drainage swale and will subsequently not be impacted by project activities. [25 Pa. Code § 105.13(e)(1)(i)]**

S4-T2 is clogged with debris and leaf litter, however it does filter some water into the pipe. During construction, the pipe will remain in place and flume water across the ROW, as it currently does, so no impact to S4-T2 will occur. The Chapter 102 and 105 drawings at this location have been updated to reflect this update. Additionally, the wetland delineation report, Requirement K - Photo Pages, ARIT, Subfacility Tables, Fee Calculation Worksheet and Environmental Assessment have been updated. Impact fees are also included, as the floodway impacts for this crossing increased. A check for \$800 is included to cover this additional impact acreage.

Additional Updates

For both the Luzerne and Monroe County Applications, the Act 14 notifications letters, Stormwater Management Consistency Letters and Floodplain Management Consistency Letters (Luzerne Only) were resubmitted in April 2022. Copies of those updated correspondences are included within Requirements C, O and P respectively.

Luzerne County

For crossings REL-AR-4 and REL-3, a PEM impact was previously shown to be included with REL-AR-4, but should have been included with REL-3. This error was addressed in the impact drawings and ARIT table. No change in impact areas or types occurred because of this error.

Monroe County

Two additional typos were corrected during the review of the ARIT.

1. The floodway impact for S8-T2 noted both S8-T2 and S9-T2 in the previous submission. S9-T2 was removed as this was incorrect as previously shown.
2. Structure/Activity Unique Identifier W12-T2-EL-11 previously indicated a Temporary PEM impact but should have been noted as a PFO impact. This error was corrected and was isolated to only the ARIT table. No changes to the Projects proposed mitigation occurred as a result of addressing this error.

It is our hope that the information as provided will allow you to complete your review in accordance with your regulations and issue the requested Permit. If you require any additional information that will facilitate your review, please do not hesitate to contact Karen Olson at (713) 215-4232 or at Karen.Olson@williams.com, or Josh Henry at (412) 787-4277 or at Josh.Henry@williams.com.

Sincerely,



Joseph Dean
Manager, Environmental Health and Safety