



September 26, 2017

Ms. Sara Holmes
Environmental Scientist
NV5
1315 Walnut Street, Suite 900
Philadelphia, PA 19107

RE: ER 2017-2210-042-A; FERC: ICE Pipeline Modification Project; Northampton, Bucks, Montgomery, Chester, and Delaware Counties; Request to Initiate Section 106 Consultation

Dear Ms. Holmes,

Thank you for submitting information concerning 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. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Archaeological Resources

We concur with the recommendation for Phase I archaeological testing for the Salford Site and the PennEast Laterals (Options A and B). We concur with the recommendation that no archaeological testing is necessary for the Marcus Hook Site, the Cromby Compressor Station Site, the Hellertown Interconnect Site, and the Martin's Creek Terminal Site.

Above Ground Resources

Based on the information received and available within our files, we offer the following comments with respect to each of the project sites.

- Marcus Hook Interconnects and Delivery Laterals Site – According to our files, the Sun Oil Company Marcus Hook Refinery (Key No. 200549) has not been previously evaluated for eligibility for listing in the National Register of Historic Places (“Insufficient Information to Evaluate”). We concur with the recommendations to complete individual Historic Resource Survey Forms (HRSF) for the Lawn Croft Cemetery (Key No. 016773 to also include the structure identified as Key No. 016772) and the newly identified Aniline Village/Penn-Del City. In addition, we concur that the Delaware-Pennsylvania Arc Boundary should be investigated with regards to features within the Area of Potential Effects (APE).
- Cromby Compressor Station Site – We concur that no additional above-ground investigations are warranted for this site.
- Salford Materials Storage Area Site – We concur with the recommendations that the farm located at 58 Cressman Road should be documented and evaluated on a HRSF. In addition, please provide additional information regarding the Salford Site and the built

resources located therein (or please confirm if these are the Interstate Energy Salford Reheating Station). Please note, if these buildings are 50 years of or older, a HRSF should be prepared.

- Quakertown Compressor Station Site – We concur with the recommendations that HRSFs should be prepared for each of the following properties: Heinrich Plank Farm (Key No. 098089); the Heinrich Plank Farm at 1115 Rich Hill Road (although please note if this is historically associated with Key No. 098089 – both properties should be evaluated/documentated on one HRSF); and the Housekeeper/Frank/Clymer Farmstead at 1175 Rich Hill Road.
- PennEast Interconnect and Lateral Site – We concur that a HRSF should be prepared for the Weaver Farmstead (2565 Applebutter Road). Please note additional historic property identification investigations on cultural resources that may be within or adjacent to the project area currently ongoing as part of the PennEast Pipeline Project (ER # 2014-1767-042). Our Cultural Resource GIS on-line mapping and inventory should be consulted regularly for updated information.
- Hellertown Interconnect Site – We are requesting additional information regarding the Gearhart-Farmstead (Key No. 202491). While this property is currently being evaluated for the aforementioned PennEast Pipeline Project, the current study recommends no additional investigations warranted. The proposed project location appears to be within the boundary for the farm. Please provide information as to the proposed project, including photographs, of work within the boundaries of the farm.
- Martin’s Creek Terminal Site - We concur that no additional above-ground investigations are warranted for this site.

Please note that all farms/farmsteads should be evaluated utilizing our “Historic Agricultural Resources of Pennsylvania, c. 1700-1960” context. A copy of the agricultural context and registration requirements for the specific agricultural region(s) within which each farm is located are available via the agricultural history website here:

<http://www.phmc.state.pa.us/portal/communities/agriculture/history/index.html>

Each HRSF should also include agricultural census data for the property and the township, as well as a site plan with the buildings labeled with approximate construction dates. In addition, as part of each HRSF, please provide historic and current aerial photographs of the property (available via www.pennpilot.psu.edu).

A copy of the HRSF as well as guidelines for completing the form is available via the “Forms and Guidance” page of our website: www.phmc.pa.gov/Preservation (please note that interior photographs and floor plans are not required).

If you need further information regarding archaeological resources, please contact Mark Shaffer at mshaffer@pa.gov or (717) 783-9900. If you need further information concerning above ground resources, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection



January 11, 2018

Ms. Sara Holmes
Environmental Scientist
NV5, Inc.
813 North Dupont Street
Wilmington, DE 19805

RE: ER 2017-2210-042-B; FERC: Adelpia Gateway Project (formerly known as IEC Pipeline Modification Project), Northampton, Bucks, Montgomery, Chester and Delaware Counties

Dear Ms. Holmes:

Thank you for providing information concerning 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. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

Archaeological Resources

- Parkway Lateral – It appears our office has not previously reviewed this component of the project, and because you have consulted with the Delaware SHPO on this, it is our understanding that this component of the project is not located in Pennsylvania. If this is not the case, please identify the locations of any aspects of this component that are located in Pennsylvania.
- Skippack Interconnect – We agree with the recommendation for Phase I testing of the temporary and permanent impact areas
- Tilghman Lateral – We agree with the recommendation for additional field survey and analysis of utility records and historic maps to document the extent of prior disturbance. If extensive previous disturbance can be documented, in our opinion, no archaeological testing is necessary. If extensive previous disturbance cannot be documented, in our opinion, Phase I testing should be conducted in the archaeologically-sensitive areas between M.P. 1.8 and M.P. 2.0; between M.P. 2.2 and M.P. 2.9; at M.P. 3.51 near Trainer Street; and at M.P. 3.7 near Palmer Street.
- Blowdown Assemblies and Proposed MainLine Valve Locations – We agree with the recommendation that further background research is necessary to determine the need for archaeological testing, although based on the mapping that has been provided, the Chester Creek MainLine Valve, the Paoli Pike MainLine Valve, the French Creek MainLine Valve, the Cromby Station MainLine Valve and the Schuylkill River MainLine Valve each appear to be located in archaeologically-sensitive areas.

Above Ground Resources

- Parkway Lateral: In our opinion, the following properties are **Not Eligible** due to a lack of integrity and/or significance:
 - Goodley-Armstrong House (Key No. 016772)
 - Lawn Croft Cemetery (Key No. 016773) – Although please note, the cemetery may have significance associated within the 1918 Spanish Influenza; however more information would need to be gathered. If the proposed project has no potential to affect the burial mound area, then no additional coordination with our office regarding this property is warranted.
 - Aniline Village (Key No. Pending) – Based on the information received, the planned community, while significant, appears to have lost integrity, including significant alteration of the original plant site, so that the community no longer retains integrity to convey an intact cohesive grouping of worker's housing constructed in 1918-1919 for the National Aniline and Chemical Company, Inc.
- Quakertown Compressor Station Site: In our opinion, the following properties are **Not Eligible** due to a lack of integrity:
 - Henry Blank Homestead No. 1 (Heinrich Plank House, Key No. 098089)
 - Henry Blank Homestead No. 2 (1115 Rich Hill Road)
 - Abraham Housekeeper Homestead (1175 Rich Hill Road)
- Skippack Interconnect Site: We concur that an updated HRSF (that applies the statewide agricultural context) should be prepared for the Kulp Farm (Key No. 140797) and that a new HRSF should be prepared for the Cook Farm (4805 Skippack Pike) that also applies the statewide agricultural context .A copy of the agricultural context and registration requirements for the specific region are available via the agricultural history website here:
<http://www.phmc.state.pa.us/portal/communities/agriculture/history/index.html> The HRSF should also include agricultural census data for the property and the township, as well as a site plan with the buildings labeled with approximate construction dates. In addition, as part of the HRSF, please provide historic and current aerial photographs of the property (available via www.pennpilot.psu.edu).
- Tilghman Lateral: We concur that no additional above-ground investigations are warranted for this site.
- Blowdown Assemblies and Proposed Mainline Valve Locations: In our opinion, based on the information received, no additional above-ground investigations are warranted for these locations.

If you need further information concerning archaeological resources, please contact Mark Shaffer at mshaffer@pa.gov or (717) 783-9900. If you need further information concerning above ground resources, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

September 14, 2018

NV5, LLC
Attn: Sara Holmes, Environmental Scientist
813 North Dupont Street
Wilmington, DE 19805

Re: ER 2017-2210-042-C – FERC: Adelpia Gateway Project (formerly IEC Pipeline Modification Project), Northampton, Bucks, Montgomery, Chester and Delaware Counties

Dear Ms. Holmes:

Thank you for submitting information concerning 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. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Historic (Above Ground) Resources

We offer the following comments with regards to the proposed project modifications in the following areas that have the potential to affect above ground historic properties:

Parkway Lateral- The Lawn Croft Cemetery (Key No. 016773) was determined Not Eligible in January 2018; therefore, no above ground properties will be affected by the proposed project.

Skippack Interconnect Site- Since the project has been revised in this location to exclude any above ground components, it is our opinion that this proposed project will have No Effect on above ground historic properties.

Pickering Creek Blowdown Assembly- The proposed project in this location is limited to replacement of an existing valve inclusive of any necessary replanting of existing tree and vegetative screening. Therefore, the proposed project will have No Effect on above ground historic properties.

Archaeological Resources

Skippack Interconnect – We agree with the recommendation that no archaeological testing is necessary provided there are no subsurface impacts outside of the existing pipeline trench. We also agree that if the project changes to include excavation in previously undisturbed locations, the need for archaeological testing should be re-evaluated.

Quakertown Compressor Station- We agree with the recommendation that no archaeological testing is necessary.

Tilghman Lateral

1. M.P. 0.3, Transco Meter Station – Goodlley/Allen Farm and Spring Site – The submitted information indicates that Phase I archaeological survey is currently underway. The Phase I report must be submitted electronically to our office via CRGIS. If you need further information on the electronic submittal process, please contact Hannah Harvey at harvey@pa.gov or (717) 346-0616.
2. M.P. 1.8 to M.P. 2.0, Crossing of Marcus Hook/Chichester Creek – We agree with the recommendation that no archaeological testing is necessary for the Horizontal Directional Drilling entry point or the Temporary Work Space.
3. M.P. 2.2 to M.P. 2.9, Crossing of Stony Run – We agree with the recommendation for Phase I archaeological testing in the area between M.P. 2.35 and 2.45 and the associated Temporary Work Space. For the pipeline alignment in the parking lot/access roadway adjacent to Stony Run, we agree with the recommendation for a geomorphological assessment in this area. The submitted information indicates that access to this area will not be granted by the property owner. In our opinion, the geomorphological assessment and subsequent Phase I archaeological testing, if warranted, should be conducted once the pipeline right-of-way has been acquired and prior to construction. We agree with the recommendation for Phase I archaeological testing for the approximately 250-foot long stretch of the pipeline alignment situated on the east side of Stony Run. We also agree with the recommendation for Phase I archaeological testing in the area of M.P. 2.85 to M.P. 2.9 and the associated Temporary Work Space and the proposed Horizontal Directional Drilling point at M.P. 2.9.
4. M.P. 3.15, Crossing of Unnamed Stream – Based on the submitted information, it is our opinion that no archaeological testing is necessary.
5. M.P. 3.55 and M.P. 3.7, Crossing of Harwick Run and Tributary – Based on the submitted information, it is our opinion that no archaeological testing is necessary.
6. M.P. 4.3 to M.P. 4.4, Adjacent to Lamokin Creek – We agree with the recommendation that no archaeological testing is necessary.

Blowdown Assembly and MLV Sites

1. Main Line Valve 1, Concord, Delaware County – We agree with the recommendation that no archaeological testing is necessary.
2. Chester Creek Assembly, Thornbury Township, Delaware County – We agree with the recommendation that no archaeological testing is necessary provided that ground disturbing activity is confined to the existing pipe trench. If new ground disturbing activity is required beyond the width and depth of the existing pipe trench, then we

agree with the recommendation for Phase I archaeological testing. We also agree that no archaeological testing is necessary for the existing access road.

3. Paoli Pike Assembly, East Goshen, Chester County – We agree with the recommendation that no archaeological testing is necessary.
4. Main Line Valve 2, East Whiteland, Chester County – We agree with the recommendation that no archaeological testing is necessary provided that ground disturbing activity is confined to the existing pipe trench. If new ground disturbance is required beyond the width and depth of the existing pipe trench, then we agree with the recommendation for Phase I archaeological testing in the areas to be impacted, including the portion of the access road located immediately south of the valve site.
5. Pickering Creek Blowdown Assembly, Charlestown, Chester County – The submitted information indicates that installation of the blowdown assembly will occur within the existing pipe and valve trench. Based on this, we agree with the recommendation that no archaeological testing is necessary. If the associated access road cannot be protected by matting to ensure there are no below-grade disturbances, then we agree with the recommendation for Phase I archaeological testing in the area of the proposed access road that is located within 300 feet of Pickering Creek.
6. French Creek Blowdown Assembly, East Pikeland, Chester County – We agree with the recommendation that no archaeological testing is necessary for the proposed Blowdown Assembly location, Temporary Work Spaces and access road provided that ground disturbing activity is confined to the existing pipe/valve trench. If new ground disturbance is required beyond the width and depth of the existing trench, then we agree with the recommendation for Phase I archaeological testing for areas to be impacted that are located within 300 feet of French Creek.
7. Cromby Station Blowdown Assembly, East Pikeland, Chester County – We agree with the recommendation that no archaeological testing is necessary.
8. Schuylkill River Blowdown Assembly, East Pikeland, Chester County – We agree with the recommendation that no archaeological testing is necessary for the location of the Blowdown Assembly. For the proposed access road, we agree with the recommendation that no archaeological testing is necessary provided that ground disturbing activity is confined to the area of the existing pipe trench or if the access road will be matted. If new ground disturbance is required beyond the width and depth of the existing trench, then we agree with the recommendation for Phase I archaeological testing for the alignment of the access road.
9. Perkiomen Creek Blowdown Assembly, Perkiomen, Montgomery County – We agree with the recommendation that no archaeological testing is necessary.

Page Four
Ms. Holmes, ER 2017-2210-042-C
September 14, 2018

10. East Branch Perkiomen Creek Blowdown Assembly, Skippack Township, Montgomery County – We agree with the recommendation that no archaeological testing is necessary for the proposed Blowdown location and Temporary Work Spaces provided that ground disturbing activity is confined to the existing pipe/valve trench. If new ground disturbance is required beyond the width and depth of the existing trench, then we agree with the recommendation for Phase I archaeological testing. We also agree that no archaeological testing is necessary in the area of the existing access road.

If you need further information concerning above ground resources, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121. If you need further information concerning archaeological resources, please contact Mark Shaffer at mshaffer@pa.gov or (717) 783-9900.

Sincerely,



Douglas C. McLearn, Chief
Division of Environmental Review