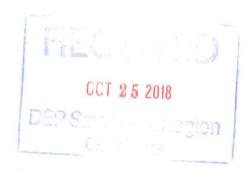


ARM Group Inc.

Engineers and Scientists

October 24, 2018

Mr. Michael Stephan Aquatic Biologist Supervisor PA Department of Environmental Protection Southwest District Oil & Gas Operations 400 Waterfront Drive Pittsburgh, PA 15222



Response to Completeness
Deficiency
Permit No. GP05020718-002
ET - Braddock Well Pad & Pipelines
Merrion Oil & Gas
East Pittsburgh Borough, North
Braddock Borough, North Versailles
Township
Allegheny County, PA
ARM Project 180549-1-1

Dear Mr. Stephan:

On behalf of Merrion Oil & Gas (Merrion), ARM Group Inc. (ARM) hereby provides this package in response to comments Merrion received in an email from the Pennsylvania Department of Environmental Protection (PADEP) dated June 29, 2018 pertaining to the General Permit Registration for the above mentioned project spanning three municipalities in East Pittsburgh Borough, North Braddock Borough, and North Versailles Township, Allegheny County, Pennsylvania. ARM has replaced the previous certifying engineer. The following paragraphs outline the PADEP comments in bold/italics followed by Merrion's responses in standard text.

Comment 1: Update all applicable drawings to show the location of the stream above the inlet of the stream enclosure. Please also provide photos of the stream. §105.13(e).

Response: The project drawing has been updated to reflect the location of the stream (Trib

64495 to Turtle Creek) above the inlet of the stream enclosure. Refer to the blue line on the enclosed Sheet C701. A picture of the stream outfall is also provided.

Comment 2: Aerial Stream crossings in urban areas need to be elevated above the 100 year storm event. Provide Hydrologic and Hydraulic Calculations for the 100-year storm event for the stream enclosure. The calculations should be affixed with

2548	Park	Center	Bou	levard		•		State	College,	PA	16801
voice:	(814)	272 - 04	5 5	· fa	a x :	(814)	272 -	0467	• WWW.	armgr	oup.net



ARM Project 180549-1-1 2 October 24, 2018

the seal of a registered professional engineer and a certification, signed by the registered professional engineer, which shall read as follows:

"I (name) do hereby certify pursuant to the penalties of 18 Pa.C.S.A. Sec. 4904 to the best of my knowledge, information and belief, that the information contained in the accompanying plans, specifications and reports has been prepared in accordance with accepted engineering practice, is true and correct, and is in conformance with Chapter 105 of the rules and regulations of the Department of Environmental Protection." §105.315, §105.161 c(3) §105.13(j)

Response: The Hydrologic and Hydraulic calculations for the 100-year storm event, sealed by a registered professional engineer, are provided in the enclosed H&H analysis summary. A sealed certification statement is also contained within the memorandum.

Comment 3: Please provide a final clearance letter from the PA Fish and Boat Commission.

This item is not needed for the application to be considered Complete, but will be needed before the General Permit can be acknowledged.

Response: A copy of the final clearance letter from the PA Fish and Boat Commission is enclosed.

ARM is submitting one (1) original and one (1) copy of this comment response package for your review and approval. We trust that this additional information addresses your review comments concerning the ET - Braddock Well Pad and Pipelines General Permit Registration. If you have any other questions or comments, or require any additional information, please do not hesitate to contact me at 814-272-0455, extension 2205.

Respectfully submitted,

Jessa M. antolick

ARM Group Inc.

Tessa Antolick, P.E. Senior Engineer

Attachments

- Sheet C701 Existing Conditions Overlay Map
- Stream Photograph
- H&H Analysis
- PA Fish & Boat Commission Clearance Letter



Sheet C701 – Existing Conditions Overlay Map





Stream Photograph





ET – Braddock Well Pad & Pipelines 1 Photograph Log



Photograph 1 – View of existing concrete headwall of 48-inch diameter culvert conveying Trib 64495 to Turtle Creek. The enclosed stream culvert is buried nearly 20 feet below existing ground surface. View is facing north.



ARM Project 180549-1-1 October 24, 2018

ARM Group Inc.

Hydrologic and Hydraulic Analysis





ARM GROUP INC. MEMO

To:

Ryan Davis, Operations Manager, Merrion Oil & Gas

From:

Brian Bonner, P.E., Project Manager

Date:

October 23, 2018

Re:

Proposed ET Braddock Well Pad and Pipelines - Summary of Hydrologic and Hydraulic

Analysis

ARM Group Inc. (ARM) has prepared this memo for Merrion Oil and Gas, (Merrion) to summarize the findings from a hydrologic and hydraulic (H&H) evaluation of the referenced project site in East Pittsburgh Borough, North Braddock Borough and North Versailles Township, Allegheny County, Pennsylvania. The purpose of this work was to determine and quantify the effect, if any, that the installation of a buried gas pipeline and an aboveground water pipeline would have on the 100-year flood elevation of an existing stream enclosure that crosses beneath the project site (Figure 1). The scope of this project included: (1) a review of available published H&H information relevant to the site; (2) a desktop hydrologic study to determine the 100-year flood event discharge; (3) the development of a hydraulic pipeline profile using HydraFlow Extensions within AutoCAD Civil 3D; (4) analysis of the 100-year flood event; and (5) compilation of this summary report.

BACKGROUND

Based upon the information received from Merrion, ARM understands that two proposed pipelines will cross above the existing stream enclosure, which carries Tributary 64495 to Turtle Creek under the existing US Steel mill and rail yard. A proposed freshwater pipeline will be installed aboveground along an abandoned rail grade. The proposed natural gas pipeline will be buried approximately 4 feet below the existing ground surface. The stream enclosure inverts are at an average depth of 18 to 20 feet below the existing ground surface resulting in a minimum separation of greater than 10 feet between the stream culvert and the pipelines.

AVAILABLE HYDROLOGIC INFORMATION

ARM utilized the online StreamStats tool for Pennsylvania, which is comprised of various GIS data layers and integrated regression equations for estimating the various recurrence intervals, or flood events. For the purposes of this exercise, ARM only reviewed the 100-year recurrence interval.

The existing stream enclosure is a 48-inch diameter culvert which encloses Tributary 64495 to Turtle Creek. This tributary ultimately discharges to Turtle Creek at approximately N40.392222° W79.848056°. Using the StreamStats application, the drainage area to this coordinate (e.g. the upstream invert of the stream enclosure) was determined to be approximately 0.44 square miles (281 acres). The StreamStats calculated peak discharge for to 100-year recurrence interval, as presented in Appendix A, was found to be 210 cubic feet per second (cfs).

	_		
	-		
20			

ARM 180539 2 October 23, 2018

HYDRAULIC MODELLING

The hydraulic model was created utilizing the results of the desktop topographic evaluation of the drainage area, a review of aerial imagery, as well as relevant information from the available FEMA Flood Insurance Study (FIS) and Flood Insurance Rate Map (FIRM) panels (Figure 2). Manning's roughness coefficients were derived from a review of the available information in conjunction with typical published values [e.g., as available in Hydrology and Floodplain Analysis (2008) and other standard textbooks].

A detailed FEMA study was completed for the Monongahela River and extends upstream into Turtle Creek. Therefore, existing regulatory cross sections are available in the immediate vicinity of the site. On the published FIRM Panel 42003C0388H, an established base flood elevation (BFE) of 740 feet occurs just upstream from where the unnamed tributary discharges from the enclosure. The enclosure discharge point is situated within the FEMA Zone AE floodplain of Turtle Creek. The known BFE was used to determine culvert flow characteristics during a 100-year return period.

The known invert elevations of the culvert and existing ground surface grade elevations were used with the HydraFlow Express software (within AutoCAD Civil 3D 2016) to calculate the 100-year water surface elevation (WSE) for the stream enclosure. The model results (Appendix B) also provide a hydraulic grade line (HGL) for the culvert based upon the Tailwater Depth (obtained from the FEMA Flood Insurance Rate Map mentioned above), which was determined to be 740 feet.

CONCLUSION

Under the 100-year flood condition per the HydraFlow results, this stream enclosure will operate under outlet control conditions, but will not overtop. As such, the proposed pipelines crossing the stream will not influence the 100-year water surface elevation or impact the inlets or outlets of the existing culvert.

LIMITATIONS

All conclusions and recommendations presented in this report are based on the appropriateness of available regression equations and historic data by others, the assumption that the topographic and geometric conditions do not deviate appreciably from those presented herein, and other factors presented in this report. In the event that the proposed construction and/or anticipated geometry change with respect to those currently proposed or assumed, if significant development or other activities that can increase stormwater runoff are known to occur in upstream locations, or in the event that conditions encountered during construction are different from those described herein, ARM should be notified so supplementary recommendations can be provided, if warranted.

CERTIFICATION

I, Brian C. Bonner, do hereby certify pursuant to the penalties of 18 Pa.C.S.A. Sec. 4904 to the best of my knowledge, information and belief, that the information contained in the accompanying plans, specifications and reports has been prepared in accordance with accepted engineering practice, is true and correct, and is in conformance with Chapter 105 of the rules and regulations of the Department of Environmental Protection." §105.315, §105.161 c(3) §105.13(j)

ARM Group Inc.

ARM 180539 3 October 23, 2018

CLOSING

Please contact the undersigned at 814-272-0455 if you have any questions or comments regarding this summary. We appreciate your time and look forward to an efficient review.

Sincerely, ARM Group Inc.

Brian Bonner, P.E. Project Manager

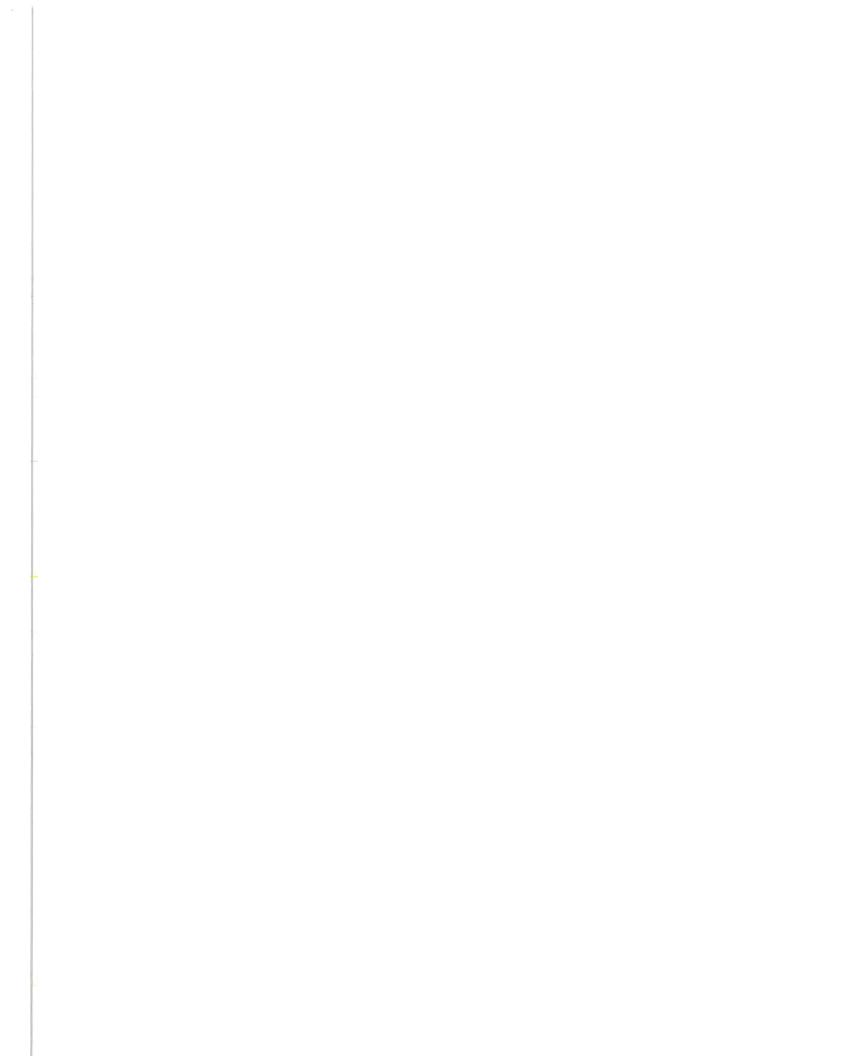
Attachments

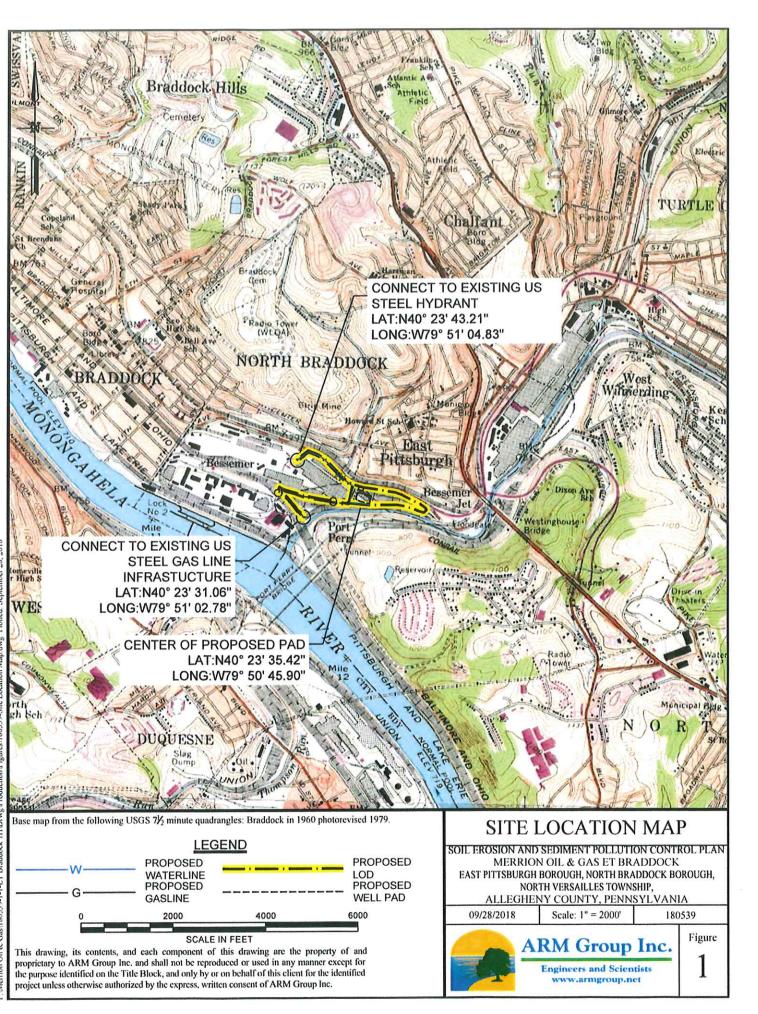


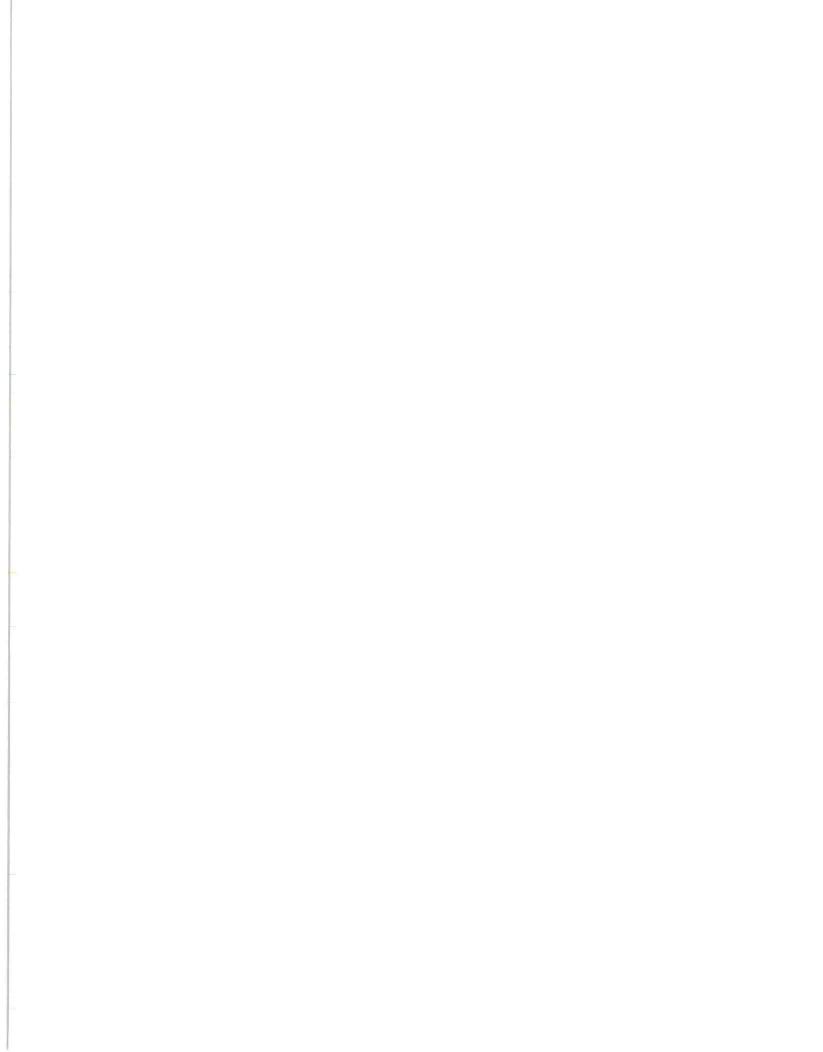
ARM Group Inc.

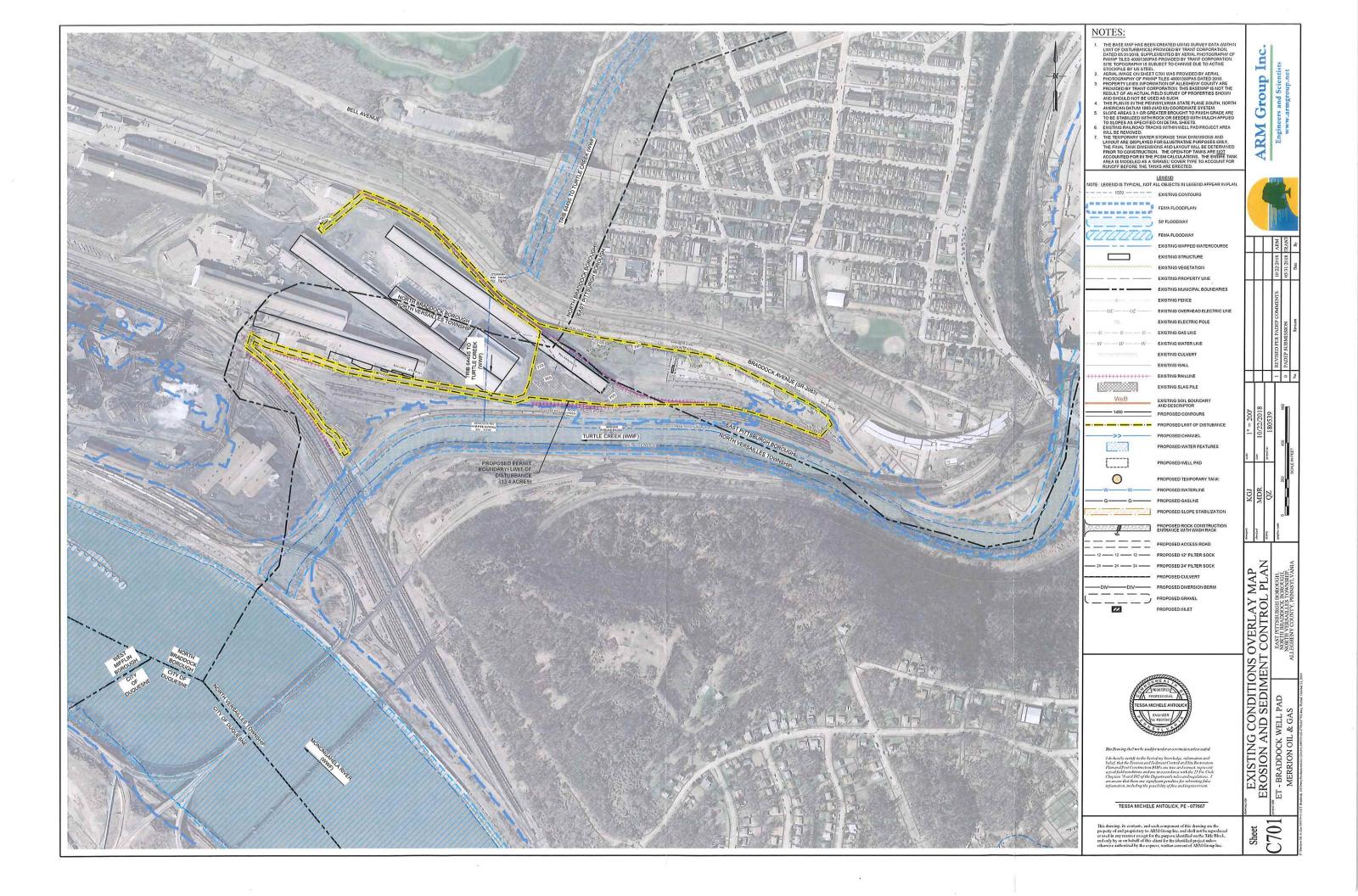
Figures











To obtain more detailed information in areas where Base Flood Elevation To obtain more detailed information in areas where Base Flood Elevations (BFEs) and/or floodways have been determined, users are encouraged to consult the Flood Profiles and Floodway Data and/or Summary of Stillwater Elevations tables contained within the Flood Insurance Study (FIS) perof that accompanies this FIRM. Users should be aware that BFEs shown on the FIRM represent rounded whole-foot elevations. These BFEs are intended for flood insurance rating purposes only and should not be used as the sole source of flood elevation data presented in the FIS report should be utilized in conjunction with the FIRM for purposes of construction and/or floodoldal management.

Coastal Base Flood Elevations shown on this map apply only landward of 0.0' North American Vertical Datum of 1988 (NAVD 88). Users of this FIRM should be aware that coastal flood elevations are also provided in the Summary of Silliwater Elevations tobles in the Flood Insurance Study report for this jurisdiction. Elevations shown in the Summary of Silliwater Elevations tables should be used for construction and/or floodplain management purposes when they are higher than the elevations shown on this EIRM.

Boundaries of the floodways were computed at cross sections and interpolated between cross sections. The floodways were based on hydraulic considerations with regard to requirements of the National Flood Insurance Program. Floodway widths and other pertinent floodway data are provided in the Flood insurance

Certain areas not in Special Flood Hazard Areas may be protected by flood control structures. Refer to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study report for information on flood control structures for this

The projection used in the preparation of this map was State Plane Pennsylvania south zone (FIPSZONE 3702). The horizontal datum was NAD 83, GRS80 spheroid. Differences in datum, spheroid, projection or State Plane zones used in the production of FIRMs for adjacent jurisdictions may result in slight positional differences in map features across jurisdiction boundaries. These differences do not affect the accuracy of this FIRM.

Flood elevations on this map are referenced to the North American Vertical Datum of 1988. These flood elevations must be compared to structure and ground elevations referenced to the same vertical datum. For information regarding conversion between the National Geodetic Vertical Datum of 1929 and the North American Vertical Datum of 1988, visit the National Geodetic Survey website at http://www.ngs.noaa.gov or contact the National Geodetic Survey at the following address:

NGS Information Services NOAA, N/NGS12 National Geodetic Survey SSMC-3, #9202 1315 East-West Highway Silver Spring, Maryland 20910-3282 (301) 713-3242

To obtain current elevation, description, and/or location information for benchmarks shown on this map, please contact the information Services Branci of the National Geodetic Survey at (301) 713-3242, or visit its website a http://www.ngs.noaa.gov.

Base map information shown on this FIRM was provided in digital format by the Allegheny County Geographic Information Systems Group. This information was photogrammetrically compiled at a scale of 1:2,400 from aerial photography dated

This map reflects more detailed and up-to-date stream channel configurations than those shown on the previous FIRM for this jurisdiction. The floodplains and floodways that were transferred from the previous FIRM may have been adjusted to conform to these new stream channel configurations. As a result, the Flood Profiles and Floodway Date tables in the Flood Insurance Study Report (which contains authoritative hydrautic data) may reflect stream channel distances that differ from what is shown on this map.

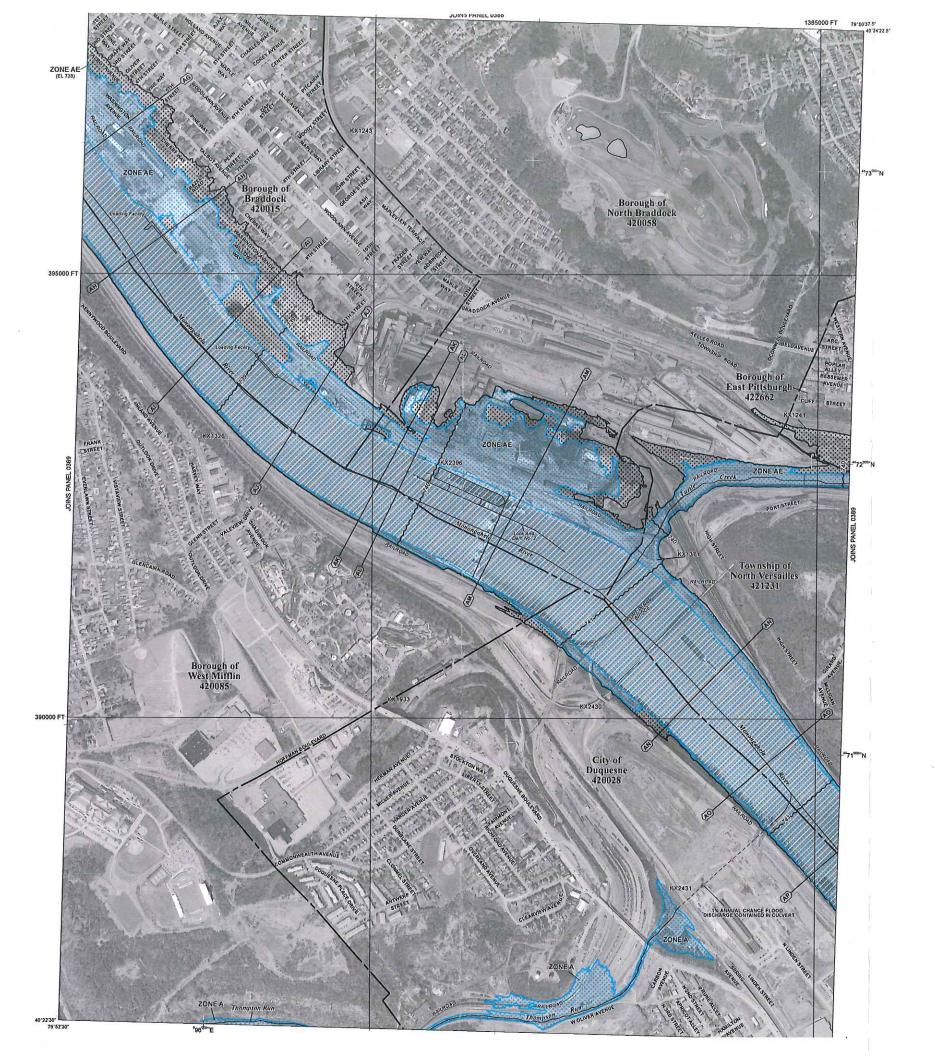
Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate

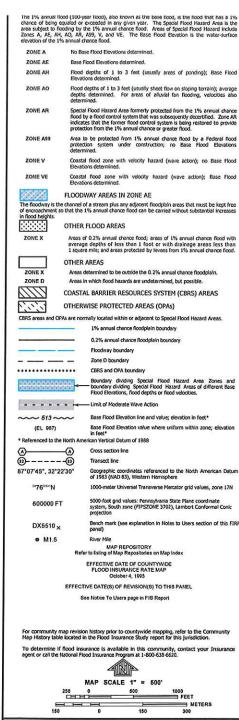
Please refer to the separately printed Map Index for an overview map of the county showing the layout of map panels; community map repository addresses; and a Listing of Communities table containing National Flood Insurance Program dates for each community as well as a listing of the panels on which each community is located.

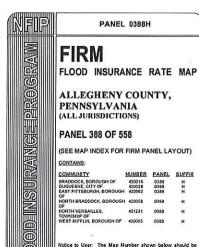
For information on available products associated with this FIRM visit the Map Servic Center (MSC) website at http://msc.ferna.gov. Available products may includ previously issued Letters of Map Change, a Flood insurance Study Report, and/c digital versions of this map. Many of these products can be ordered or obtained irectly from the MSC website.

If you have questions about this map, how to order products or the National Flood Insurance Program in general, please call the FEMA Map Information eXchange (FMIX) at 1-877-FEMA-MAP (1-877-336-2627) or visit the FEMA website at http://www.fema.gov/business/nfip.









ALLEGHENY COUNTY,

UGH OF 420015 0388 F 420028 0388 BOROUGH 422662 0388



MAP NUMBER 42003C0388H

MAD DEVICED

APPENDIX A

StreamStats Output



StreamStats Report

Region ID:

PA

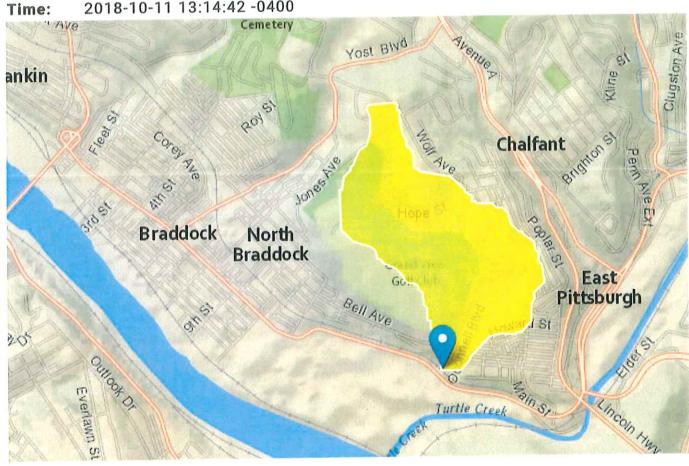
Workspace ID:

PA20181011171414822000

Clicked Point (Latitude, Longitude):

40.39508, -79.84784

2018-10-11 13:14:42 -0400



Basin Characteristics

Parameter Code	Parameter Description	Value	Unit
DRNAREA	Area that drains to a point on a stream	0.44	square miles
ELEV	Mean Basin Elevation	1059.2	feet
CARBON	Percentage of area of carbonate rock	0	percent
PRECIP	Mean Annual Precipitation	37	inches

Parameter Code	Parameter Description	Value	Unit
FOREST	Percentage of area covered by forest	45	percent
URBAN	Percentage of basin with urban development	51	percent
BSLOPD	Mean basin slope measured in degrees	9.1	degrees
BSLOPDRAW	Unadjusted basin slope, in degrees	9.32	degrees
CENTROXA83	X coordinate of the centroid, in NAD_1983_Albers, meters	-156841.6	meters
CENTROYA83	Basin centroid horizontal (y) location in NAD 1983 Albers	157375.9	meters
DRN	Drainage quality index from STATSGO	3.4	dimensionless
GLACIATED	Percentage of basin area that was historically covered by glaciers	0	percent
IMPNLCD01	Percentage of impervious area determined from NLCD 2001 impervious dataset	29	percent
LC01DEV	Percentage of land-use from NLCD 2001 classes 21-24	96	percent
LC11DEV	Percentage of developed (urban) land from NLCD 2011 classes 21-24	96.3	percent
LC11IMP	Average percentage of impervious area determined from NLCD 2011 impervious dataset	28.6	percent
LONG_OUT	Longitude of Basin Outlet	-79.84785	degrees
MAXTEMP	Mean annual maximum air temperature over basin area from PRISM 1971-2000 800-m grid	60	degrees F
OUTLETXA83	X coordinate of the outlet, in NAD_1983_Albers,meters	-156855	meters
OUTLETYA83	Y coordinate of the outlet, in NAD_1983_Albers, meters	156535	meters
ROCKDEP	Depth to rock	2.4	feet

Parameter Code	Parameter Description	Value	Unit
STORAGE	Percentage of area of storage (lakes ponds reservoirs wetlands)	0	percent
STRDEN	Stream Density total length of streams divided by drainage area	0	miles per square mile
STRMTOT	total length of all mapped streams (1:24,000-scale) in the basin	0	miles

Low-Flow Statistics Parameters [Low Flow Region 4]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	0.44	square miles	2.26	1400
ELEV	Mean Basin Elevation	1059.2	feet	1050	2580

Low-Flow Statistics Disclaimers [Low Flow Region 4]

One or more of the parameters is outside the suggested range. Estimates were extrapolated with unknown errors

Low-Flow Statistics Flow Report [Low Flow Region 4]

Statistic	Value	Unit
7 Day 2 Year Low Flow	0.00993	ft^3/s
30 Day 2 Year Low Flow	0.0198	ft^3/s
7 Day 10 Year Low Flow	0.00278	ft^3/s
30 Day 10 Year Low Flow	0.00627	ft^3/s
90 Day 10 Year Low Flow	0.013	ft^3/s

Stuckey, M.H.,2006, Low-flow, base-flow, and mean-flow regression equations for Pennsylvania streams: U.S. Geological Survey Scientific Investigations Report 2006-5130, 84 p. (http://pubs.usgs.gov/sir/2006/5130/)

Bankfull Statistics Parameters [Statewide Bankfull Noncarbonate 2018 5066]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	0.44	square miles	2.62	207
CARBON	Percent Carbonate	0	percent		

Bankfull Statistics Disclaimers [Statewide Bankfull Noncarbonate 2018 5066]

One or more of the parameters is outside the suggested range. Estimates were extrapolated with unknown errors

Bankfull Statistics Flow Report [Statewide Bankfull Noncarbonate 2018 5066]

Statistic	Value	Unit
Bankfull Area	6.44	ft^2
Bankfull Streamflow	23.3	ft^3/s
Bankfull Width	9.8	ft
Bankfull Depth	0.699	ft

Bankfull Statistics Citations

Clune, J.W., Chaplin, J.J., and White, K.E.,2018, Comparison of regression relations of bankfull discharge and channel geometry for the glaciated and nonglaciated settings of Pennsylvania and southern New York: U.S. Geological Survey Scientific Investigations Report 2018–5066, 20 p. (https://doi.org/10.3133/sir20185066)

Annual Flow Statistics Parameters (Statewide Mean and Base Flow)

Parameter				Min	Max
Code	Parameter Name	Value	Units	Limit	Limit

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	0.44	square miles	2.26	1720
ELEV	Mean Basin Elevation	1059.2	feet	130	2700
PRECIP	Mean Annual Precipitation	37	inches	33.1	50.4
FOREST	Percent Forest	45	percent	5.1	100
URBAN	Percent Urban	51	percent	0	89
CARBON	Percent Carbonate	0	percent	0	99

Annual Flow Statistics Disclaimers [Statewide Mean and Base Flow]

One or more of the parameters is outside the suggested range. Estimates were extrapolated with unknown errors

Annual Flow Statistics Flow Report [Statewide Mean and Base Flow]

Statistic	Value	Unit
Mean Annual Flow	0.559	ft^3/s
Harmonic Mean Streamflow	0.0937	ft^3/s

Annual Flow Statistics Citations

Stuckey, M.H.,2006, Low-flow, base-flow, and mean-flow regression equations for Pennsylvania streams: U.S. Geological Survey Scientific Investigations Report 2006-5130, 84 p. (http://pubs.usgs.gov/sir/2006/5130/)

Base Flow Statistics Parameters [Statewide Mean and Base Flow]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	0.44	square miles	2.26	1720

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
PRECIP	Mean Annual Precipitation	37	inches	33.1	50.4
CARBON	Percent Carbonate	0	percent	0	99
FOREST	Percent Forest	45	percent	5.1	100
URBAN	Percent Urban	51	percent	0	89

Base Flow Statistics Disclaimers [Statewide Mean and Base Flow]

One or more of the parameters is outside the suggested range. Estimates were extrapolated with unknown errors

Base Flow Statistics Flow Report [Statewide Mean and Base Flow]

Statistic	Value	Unit
Base Flow 10 Year Recurrence Interval	0.179	ft^3/s
Base Flow 25 Year Recurrence Interval	0.159	ft^3/s
Base Flow 50 Year Recurrence Interval	0.147	ft^3/s

Base Flow Statistics Citations

Stuckey, M.H.,2006, Low-flow, base-flow, and mean-flow regression equations for Pennsylvania streams: U.S. Geological Survey Scientific Investigations Report 2006-5130, 84 p. (http://pubs.usgs.gov/sir/2006/5130/)

Peak-Flow Statistics Parameters [Peak Flow Region 4]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	0.44	square miles	0.92	1720

Peak-Flow Statistics Disclaimers [Peak Flow Region 4]

One or more of the parameters is outside the suggested range. Estimates were extrapolated with unknown errors

Peak-Flow Statistics Flow Report [Peak Flow Region 4]

Statistic	Value	Unit	
2 Year Peak Flood	33.3	ft^3/s	
5 Year Peak Flood	63.4	ft^3/s	
10 Year Peak Flood	90.1	ft^3/s	
50 Year Peak Flood	168	ft^3/s	٠
100 Year Peak Flood	210	ft^3/s	
500 Year Peak Flood	332	ft^3/s	

Peak-Flow Statistics Citations

Roland, M.A., and Stuckey, M.H.,2008, Regression equations for estimating flood flows at selected recurrence intervals for ungaged streams in Pennsylvania: U.S. Geological Survey Scientific Investigations Report 2008-5102, 57p. (http://pubs.usgs.gov/sir/2008/5102/)

USGS Data Disclaimer: Unless otherwise stated, all data, metadata and related materials are considered to satisfy the quality standards relative to the purpose for which the data were collected. Although these data and associated metadata have been reviewed for accuracy and completeness and approved for release by the U.S. Geological Survey (USGS), no warranty expressed or implied is made regarding the display or utility of the data for other purposes, nor on all computer systems, nor shall the act of distribution constitute any such warranty.

USGS Software Disclaimer: This software has been approved for release by the U.S. Geological Survey (USGS). Although the software has been subjected to rigorous review, the USGS reserves the right to update the software as needed pursuant to further analysis and review. No warranty, expressed or implied, is made by the USGS or the U.S. Government as to the functionality of the software and related material nor shall the fact of release constitute any such warranty. Furthermore, the software is released on condition that neither the USGS nor the U.S. Government shall be held liable for any damages resulting from its authorized or unauthorized use.

USGS Product Names Disclaimer: Any use of trade, firm, or product names is for descriptive purposes only and does not imply endorsement by the U.S. Government.

Application Version: 4.2.1

APPENDIX B

HydraFlow Output



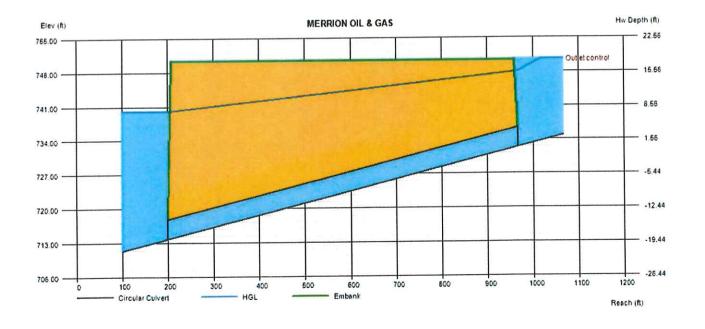
Culvert Report

Hydraflow Express Extension for Autodesk® AutoCAD® Civil 3D® by Autodesk, Inc.

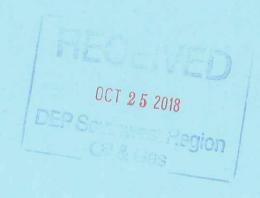
Monday, Oct 15 2018

MERRION OIL & GAS

Invert Elev Dn (ft)	= 713.80	Calculations	
Pipe Length (ft)	= 766.00	Qmin (cfs)	= 210.00
Slope (%)	= 2.43	Qmax (cfs)	= 210.00
Invert Elev Up (ft)	= 732.44	Tailwater Elev (ft)	= 740
Rise (in)	= 48.0		
Shape	= Circular	Highlighted	
Span (in)	= 48.0	Qtotal (cfs)	= 210.00
No. Barrels	= 1	Qpipe (cfs)	= 146.52
n-Value	= 0.013	Qovertop (cfs)	= 63.48
Culvert Type	= Circular Culvert	Veloc Dn (ft/s)	= 11.66
Culvert Entrance	 Smooth tapered inlet throat 	Veloc Up (ft/s)	= 11.66
Coeff. K,M,c,Y,k	= 0.534, 0.555, 0.0196, 0.9, 0.2	HGL Dn (ft)	= 740.00
		HGL Up (ft)	= 747.97
Embankment		Hw Elev (ft)	= 750.51
Top Elevation (ft)	= 750.44	Hw/D (ft)	= 4.52
Top Width (ft)	= 750.00	Flow Regime	= Outlet Control
Crest Width (ft)	= 1000.00	3	
Ciest Width (it)	1000.00		



PA Fish and Boat Commission Clearance







Pennsylvania Fish & Boat Commission

Division of Environmental Services
Natural Gas Section
595 E Rolling Ridge Dr.
Bellefonte, PA 16823

June 11, 2018

IN REPLY REFER TO SIR# 49603

Trant Corporation Alexander Trant 11279 Perry Highway Wexford, Pennsylvania 15090

RE: Species Impact Review (SIR) - Rare, Candidate, Threatened and Endangered Species

PNDI Search No. 657407_1

Merrion Oil & Gas ET Braddock 1H

ALLEGHENY County: East Pittsburgh Borough, North Braddock Borough, North

Versailles Township

Dear Alexander Trant:

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 jurisdiction (fish, reptiles, amphibians, aquatic invertebrates only) using the Pennsylvania Natural Diversity Inventory (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.

Freshwater Mussels and Fish

Rare or protected freshwater mussel and fish species are known from the vicinity of the project area. 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. Freshwater mussel and fish species are extremely vulnerable to physical (i.e., siltation, dredging, trenching, rip-rap) and chemical (i.e., pH, temperature, dissolved oxygen, organic contaminants, heavy metals) changes to their aquatic environment. Therefore, we recommend construction techniques that eliminate in-stream work, sedimentation and changes to water quality. I recommend that you avoid any in-stream disturbance or water quality degradation during and after the project installation. Storm sewers and retention basins should be designed so as to minimize/remove all silt from the water before it is released into the stream. Strict erosion and sedimentation control measures, as well as best management practices should be employed. Provided that these recommendations are followed, in-stream work is

Our Mission: www.fish.state.pa.us

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 freshwater mussel or fish species of concern.

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 reinitiated.

If you have any questions regarding this review, please contact Gary Smith at 814-279-3080 and refer to the SIR # 49603. Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

ary a. Smith

Sincerely,

Gary Smith

Natural Gas Section

GAS/dn

OCT 25 2018

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF WATERWAYS ENGINEERING AND WETLANDS

CHAPTER 105 WATER OBSTRUCTIONS AND ENCROACHMENT GENERAL PERMIT REGISTRATION

JUN 1 1 2018	SECTION A. APPLIC	ANT INFORMATION			
FERC Natural Gas Activity	Docket Number Quality Certification (WQC) r C approval and/or Oil & Gas	equest been sent to DE	Facility _ P?	s \square N	
	C approval and/or Oil & Gas ty is regulated by FERC and	provide the FERC dock	cet numbe		
Applicant's Name / Client DEP Client ID# (if known) Employer ID# (EIN) 850232430					
Merrion Oil & Gas Client Information - Please select Client Type / Code from drop down box under the correct entity shown to the right. (or may be written in) → Government Hodividual					
Mailing Address 610 Reilly Ave		City Farmington	State NM		ZIP + 4 87401
Contact Person – Last Name Davis	First MI Suffix Ryan	Telephone (505) 402-5798		Addres:	
	TION B. CONSULTANT INFO	ORMATION (If applicable	e) 🗌 N/.	Α	
Contact Person – Last Name Kneidel	First MI Suffix Matt	Consultants Title Project Manager			ulting Firm Corporation
Mailing Address 11279 Perry Hwy, Ste 206	City Wexford	State ZIP + 4 PA 15090		ZIP + 4	
Telephone (724) 935-7900	Telephone Fax Email Employer ID# (EIN)				
(124) 000 1000	SECTION C. PROJ	ECT INFORMATION	10.7.63		
Project / Site Name Merrion Oil & Gas ET 1H		DEP Site ID# (if known			
	ease select Site-to-Client down box to the right. (or may	Double-click on shad Client Relationship / C LESSE Lessee		elow to s	select correct Site-to-
County Allegheny	Municipality ☐ City ☐ North Braddock, North Versa	Borough 🛚 Township	Not No	e: Mui otificat	nicipal & County ion is Required
Site Location / Address	City Braddock	State PA		ZIP + 4 15104	
Collection Method: ☐ EMAP ☐ HGIS ☐ GISDR* ☐ ITPMP ☐ GPS ☐ WAAS ☐ LORAN					
Check the horizontal reference datum (or projection datum) employed in the collection method.					
EMAP and HGIS (PNDI) have known datum and do not require checking here. NAD27 NAD83 WGS84 (GEO84) LAT.: 40.393331 LONG.: -79.845723					

NOTE: A Submerged Lands License Agreement (SLLA) with an annual fee, if applicable, may also be required for your project. You will be notified if an SLLA is required.

The <u>Aquatic Resources Impact Table (SECTION E. PROPOSED IMPACTS)</u> must be completed or equivalent submitted for this registration to be complete.

	SECTION D. REGISTRATION CHECKLIST AND REQUIREME	ENTS					
	se an "X" next to each item (1-9) to ensure it is completed and/or provided.						
	Unless otherwise specified, all items are <u>required</u> to ensure a complete Registration package. **Provide ONE (1) ORIGINAL and ONE (1) COPY of the Registration package**						
Place p	royide a copy of the Registration form to the Municipality & County in which	h the work will be perfo	rmed.				
	Proof of receipt is not required to be provided to DEF.						
	ERING A GENERAL PERMIT (GP) check all that apply	CT EVERADT &					
Federal, St	ate, county or municipal agencies or municipal authorities:	EXEMPT fr	om tees				
☐ GP-1	Fish Habitat Enhancement StructuresPer Project	\$ 50 =	\$				
☐ GP-2	Small Docks and Boat Launching Ramps Per Dock / Ramp (#) X	(\$ 175 =	\$				
☐ GP-3	Bank Rehabilitation, Bank Protection and Gravel Bar Removal	\$ 250 =	\$				
☐ GP-4	Intake and Outfall StructuresPer Structure (#) X	\$ 200 =	\$				
⊠ GP-5	Utility Line Stream Crossings Per Individual Utility 2 (#) X 1 (#) X	\$ 250 =	\$ <u>500</u>				
☐ GP-6	Agricultural Crossings and Ramps Per Crossing / Ramp (#) X	\$ 50 =	: \$				
☐ GP-7	Minor Road Crossings ² Per Crossing (#) X	\$ 350 =	= \$				
☐ GP-8	Temporary Road Crossings ² Per Crossing (#) X	\$ 175	= \$				
☐ GP-9	Agricultural ActivitiesPer Project	\$ 50 =	= \$				
☐ GP-10	Abandoned Mine ReclamationPer Project	\$ 500	= \$				
☐ GP-11	Maintenance, Testing, Repair, Rehabilitation, or Replacement of Water Obstructions and Encroachments ¹	\$ 750 +					
	☐ Temporary Disturbance (\$400/0.1ac) acres x \$4,000) = \$ +					
	Permanent Disturbance (\$800/0.1ac) acres x \$8,000		= \$				
☐ GP-1	5 Private Residential Construction in Wetlands ¹	\$ 750 +					
	Temporary Disturbance (\$400/0.1ac) acres x \$4,000) = \$ +					
	Permanent Disturbance (\$800/0.1ac) acres x \$8,000	<u> </u>	= \$				
V	GP(s) FEE subtotal (b)	\$ <u>500</u>				

		Applicant Entry	DEP Use Only
2.	Location Map (USGS quad map) with project site marked:		
3.	Color Photographs with dates, locations, and descriptions: GP-3 GP-11 N/A		П
4.	Project Description: (Example: Linear pipeline project using multiple GP-5's and GP-8's; OGP-7 for an access road to my property) Two linear stream crossings (GP-5), both crossing existing stream enclosure. One proposed below ground gas line. One proposed above ground gas line.	an	
5.	Site Specific and/or Standard Drawings are (required for all) project's GP activities.		
	For Activities that qualify for GP-7 or GP-11		
	Plans, specifications, and reports for bridges and culverts across a stream which are to be used by general public such as an access to an industrial, commercial or residential development, etc., shall prepared by a registered professional engineer and shall be affixed with their seal and certification when shall read as follows on the drawings:	ich	
	If the project includes a bridge or culvert replacement or the proposed work will change the waterwopening, please complete and provide the <u>Bridge and/or Culvert Replacement Projects or Projects T Change the Waterway Opening (3150-PM-BWEW0552B)</u> worksheet. If the project consists of similar w (replacement or change in waterway opening) on more than one structure, provide the data requested each structure included in this Registration package.	hat ork for	
	"I (name) do hereby certify pursuant to the penalties of 18 Pa. C.S.A. Sec. 4904 to the best of my knowled information and belief, that the information contained in the accompanying plans, specifications, and repended been prepared in accordance with accepted engineering practice, is true and correct, and is conformance with Chapter 105 of the rules and regulations of the Department of Environmental Protection	orts : in	
	 Proposed Project Purpose depicting the site of the projects GP activities and impacts. Brid discuss the need for the authorization. 	efly 🔯	
7.	Erosion & Sediment Control Plan (E&S Plan) (Required for all GP's but specifical required with submission with a registration of GP-11 or GP's for oil and gas related activities submitted to DEP.)	ally 🖂	
8.	 Pennsylvania Natural Diversity Inventory (PNDI): PNDI Search Receipt and clearar letters, if available. See additional requirements for submission with Avoidance Measu and/or Potential Impacts. 	res 🖂	
9.	. Activities which impact wetlands: (For State Regulated Impacts) Please place an "X" next to the appropriate box indicating the information provided:		
	N/A because no wetland impacts are proposed or no compensatory mitigation is necessary		
	A wetland delineation with complete data sheets in accordance with the 1987 Corps Engineers Wetland Delineation Manual AND the appropriate Regional Supplements to Corps of Engineers Wetland Delineation Manual for use in Pennsylvania.	the	
	If direct or indirect wetland impacts are greater than 0.05 acre, a compensatory mitigal plan in accordance with the Department's Replacement criteria which provisions compensation for both affected acreage, and functions at a minimum of one to one ratio.	des	
	If compensatory mitigation onsite is determined not feasible: A check, number, in the amount of \$ payable to the National Fish and Wild Foundation, N.A. 1237, as compensatory mitigation for acres of impact in wetlar in accordance with the Pennsylvania Wetland Replacement Project.	Ilife ads,	
	(Additional Mitigation May Be Required by U.S. Army Corps)		
N	IOTE: If the Pennsylvania Wetland Replacement Fund is proposed to be used compensatory mitigation for waters of the Commonwealth the U.S. Army Corps Engineers may also require additional mitigation if the proposed activity impa waters of the United States.	of	

Aquatic Resource Impact Tablepplicant's Name / Client:

Date:

Merrion Oil Gas_

3150-PM-BWEW0557 7/2016

Project / Site Name:

Merrion Oil & Gas ET Braddock 1H

square feet A/N ₹ Z PADEP / 105
Floodway V
Impact
AREA square feet S 8 Perm DEP Impact TYPE temp/ Perm square feet Wetland Impact AREA square feet Stream Impact AREA Corps / 404
Stream
Impact
LENGTH
linear feet linear feet Stream Impact WIDTH Corps Impact TYPE femp / perm PA Code Chapter 93 Designation WWF -79.848094 Excavation TURTLE CR WWF UNT. TO TURTLE CR Waters Name Work Proposed / Impact Type Aerial -79.84533 Longitude dd nad83 Project Information 40.393734 40.392799 Latitude dd nad83 Aquatic Resource TYPE Floodway Aquatic Resource being impacted Stream Stream unique identifier SE 1 (water) Structure / Activity SE 1 (gas) DEP / Corps use only
PADEP Single and
Permit Complete Number
Number Project feave blank leave blank eave blank

Authorization.

	SEC	CTION F. CE	RTIFICATIO	N
knowledge and information and significant penalties for submitti (If any of the information and/or	d that I possess the ing false informatior r plans is found to b pension, or revocat	e authority to n, including th be in error, fa tion in accord	undertake t e possibility Ilsified, and/d	egistration is true and correct to the best of my he proposed action. I am aware that there are of fine and imprisonment for knowing violations. or incomplete, this authorization/verification may applicable regulations.) I further certify that this
	ernon			5-29-18 Date
(e of Applicant / Owr			Date
Presider	ed / Printed Name			
Тур	ed / Printed Title			
THIS ACKNOWLEDGE	or District, and, who	ere required, S GENERAL	obtained an . PERMIT F	Plan reviewed by the appropriate Regional Office SLLA from DEP. REGISTRATION PACKAGE AND THE ITE DURING CONSTRUCTION.
SE	CTION G. DECISION	ON / DISPOS	SITION – CO	MPLETED BY DEP
Decision Review:				
			GP	
DEP / District Re	eviewer Signature		Оr <u> </u>	
			GP	
Reviewer's Type	d / Printed Name		NOTE:	See Aquatic Resource Impact Table for any additional authorizations.
Dispositi	ion Status			Comments
. □ ACKNOWLEDGED	Date			
SLLA Required	☐ Yes Attached	☐ No		
☐ INCOMPLETE / DEFICIENCY	Date			
☐ EXTENSION REQUEST	Date			
☐ WITHDRAWN	Date			
NOTE: If the GP registration	applicant. A copy	of the return	ned registra	s registration form and requested additional ation form and additional information must be date listed above.
FEDERAL AUTHORIZATION Non-reporting PASPGF Reporting – A copy of Separate federal author	verification / authorities this General Permit	t registration p		been sent to the U.S. Army Corps of Engineers.
such authorization may be requ	ired prior to startin	ng your projec	ct. In accord	have Federal authorization for this project and dance with Section 404 of the Clean Water Act, a ged and/or fill material into waters of the United

- 5 -

States, including jurisdictional wetlands. Section 10 of the Rivers and Harbors Act also requires Department of the Army authorization for any work in, over, or under a navigable water of the United States. In accordance with procedures established with the U.S. Army Corps of Engineers, you will be contacted directly by the Corps regarding Federal