



September 12, 2016

Kimberly Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: OEP/DG2E/Gas 2
PennEast Pipeline Company, LLC
FERC Docket No. CP15558000
FERC/EIS0271D

Re: Supplement to Delaware Riverkeeper Network Field-Truthing Report

Secretary Bose:

DRN's extensive comments and series of expert reports on the DEIS field earlier today are available here: <http://bit.ly/DRNreDEIS>. The DRN monitoring and field report is available here: <http://www.delawariverkeeper.org/sites/default/files/DRN.Penn%20East%20DEIS%20Field%20Truthing%20Monitor%20Report.FINALwFigures.pdf>

Community members and volunteer monitors have shared additional potential freshwater wells and freshwater springs that may be within 150 feet of the Penn East Pipeline route (or 500 ft if karst topography) and that are not listed in the current inadequate Draft Environmental Impact Statement (DEIS). Since alignment sheets are not updated we have not field verified the groundwater well findings but share the information as requested by the community to ensure it is on record for consideration since currently there are many gaps in the DEIS that need further scrutiny and the community has tremendous concern as all of these inadequacies continue to unfold with a flawed DEIS.

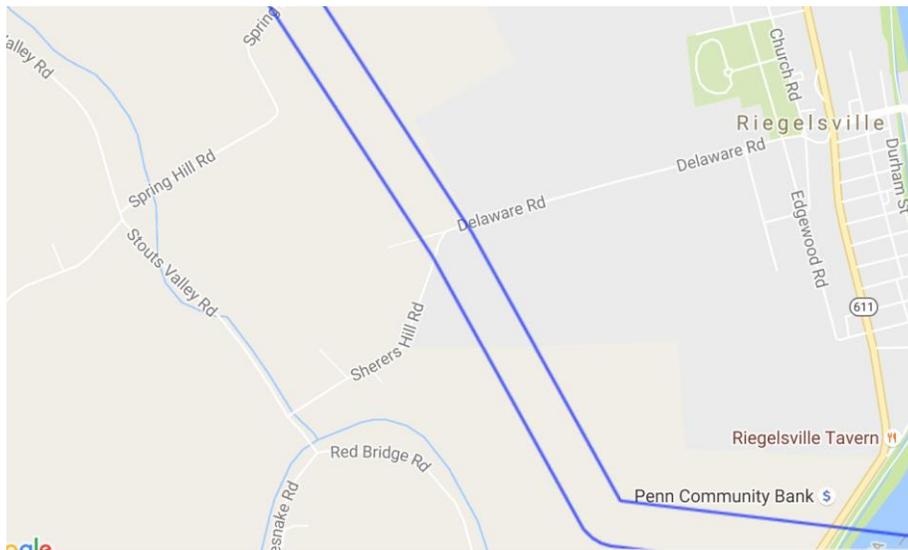
These potential additions below add to the private wells that Schmid & Company noted in the Delaware Riverkeeper Network (DRN) detailed submission and technical expert memo report commissioned by DRN dated Sept 9, 2016 and the springs and seeps noted in DRN's Field Truthing report dated September, 2016. The following was noted by Mr. Kunz in the Schmid report: *"We have identified properties and specific landowners in Pennsylvania where there are (confirmed), or where there are likely to be, springs or drinking water wells located within 150 feet of the proposed pipeline construction workspace. Examples include: at MP 58.2 along E. Dannersville Road in Moore Township,*

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
drm@delawariverkeeper.org
www.delawariverkeeper.org

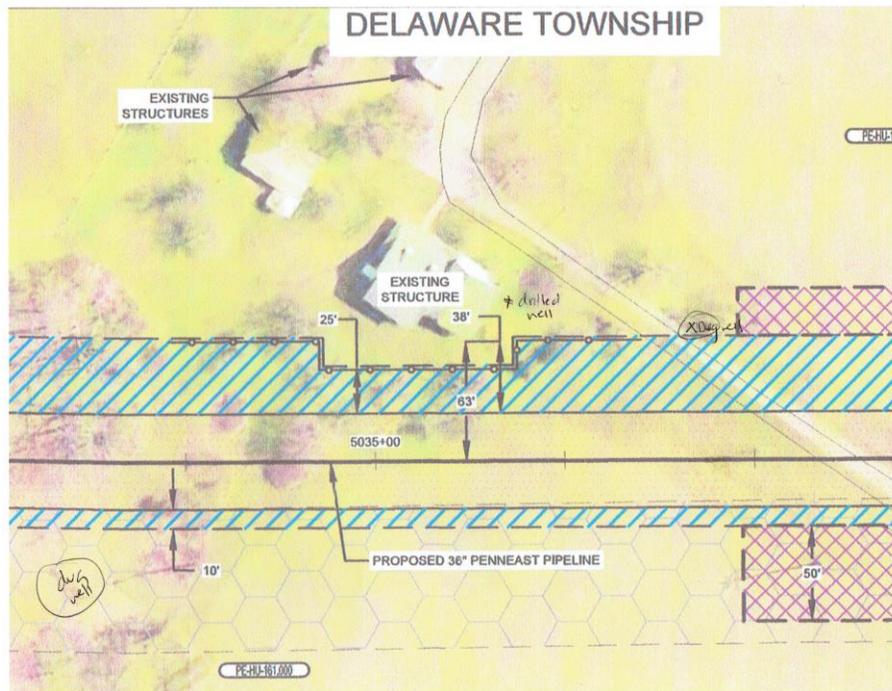
Northampton County; at MP 57.8 along W. Beersville Road in Moore Township, Northampton County; near MP 53 along North Cottonwood Road in Danielsville, Northampton County; near MP 45.75 east of Beers Lane, Towamensing Township, Carbon County.”

Freshwater wells and springs that the DEIS does not include that may be impacted and within 150 feet the proposed pipeline route:

- 1) Two wells in vicinity of MP 32.7 (9/22/15 MP) located on 1300 block N. Old Stage Rd., Albrightsville, PA Carbon County that may be within 150 ft. of the pipeline ROW
- 2) A spring supplying residential water within the 150 ft near vicinity of MP 45.9 along 400 block of Stagecoach Rd., Palmerton, PA. This spring is also part of preserved farmland.
- 3) The DEIS states that Karst topography should have a 500 foot buffer from wells and springs which DRN and groundwater experts believe is not protective enough but landowners and Durham Planning Commission shared that in Riegelsville, NJ there may be as many as a dozen but at least three properties within 500 ft. of the alignment. See map below:



- 4) At MP 95-96 area off Sanford Road a landowner reported two wells that are used for livestock on a preserved farmland within a C1 watershed. The landowner estimates the distance from the wells to the proposed route is about 75 feet. See image below:



5) At MP 77.6 a local café in Durham Township that is soon to open for the community may have a private well within the ROW construction zone – this is an area where HDD is proposed to take place under the Delaware River and the landowner has expressed a lot of concern. The mixed use commercial and residential building is a real estate investment for a local family who is soon to open a local coffeehouse and well water is critical to their business.

The current DEIS states: *“Based on review of the Pennsylvania Department of Conservation and Natural Resources (PADCNR) Pennsylvania Groundwater Information System, no public and/or private water supply wells or springs are located within 150 feet of the pipeline construction workspace in Pennsylvania. PennEast also observed no public or private water supply wells in Pennsylvania during its field investigations completed as of August 20, 2015; however, the route has been modified since these surveys were completed. PennEast identified two public supply wells near the proposed pipeline in Alexandria Township in Hunterdon County, New Jersey (table 4.3.1-4). These wells are near MP 84.7 and would be within 90 and 149 feet of the proposed workspace....PennEast has not identified private wells in the vicinity of the Project in New Jersey, but would identify private wells along the New Jersey segment of the pipeline using available public records and interviews with existing homeowners.*

DRN has documented well water problems at similar pipeline projects. Dr. Tom Meyers August 31, 2016 expert report submitted on the docket addresses other concerns with groundwater impacts that the PE pipeline could cause.

Bald eagle and osprey - missing from DEIS, recreation and picnic and swimming hole

A DRN volunteer monitor assessed vicinity of MP 43.5-44. The monitor’s observations included vernal pools located along Wild Creek Cove that DRN documented in our earlier 9/12/2016 comment. Section 4.1.5.2 specifically references MP 40.5 in Carbon to MP 54.1 in Northampton County as having a relatively high susceptibility to landslides. While the current discussion in the DEIS and for the Army Corp of Engineers is HDD across the Wild Creek and Pohopoco Creek, the DEIS also states that if it is deemed undoable PennEast would undertake an alternative method. Such an endeavor would be an environmental disaster for Beltzville State Park. Clearcutting and trenching would also open this

portion of the park to visitors who otherwise would not be able to access the area again leading to environmental damage from the increased foot traffic and compaction and all the other harms that come with an open cut. In addition the volunteer monitor documented a favorite swimming hole and boulder outcropping used for diving that would be impacted by the proposed route. This sounds like an area that may require blasting and the impacts that would go with that. Wild Creek Cove in this area of the route is heavily forested and very steep. Although not in the immediate vicinity of the proposed pipeline is the waterfall and the rapids. The monitor observed on multiple occasions and had been told this area is heavily enjoyed by the local community and visitors alike. Climbing, canoeing, kayaking, picnicking are all popular activities in this area. The community and local hunters have observed juvenile bald eagles frequenting this area of Wild Creek Cove over the years. Ospreys were also reported to nest and frequent the area of Wild Creek Cove and Pohopoco Creek, Carbon County PA. There is a local informal area to birdwatch for eagles and ospreys off Penn Forest Road. Bald eagles have also been reported at Beltsville State Park and Lake and Wild Creek reservoir.

The DEIS states that PennEast conducted habitat screening for bald eagles in accordance with the National Bald Eagle Management Guidelines (FWS 2007b). The DEIS states that bird surveys were conducted for bald eagles and only six eagle nests were identified near the Project area along the entire 115 mile path -- four in Pennsylvania and two in New Jersey.

The DEIS lists osprey as threatened in New Jersey and Pennsylvania but only present in Bucks PA and Hunterdon NJ. Volunteer monitors observed osprey in Carbon County, PA so this table is incorrect and incomplete. The DEIS also states in Table 4.6-2 that as of May 2016 no surveys for osprey were conducted or planned. In light of these observations of osprey expanding the scope and surveys for these species is recommended. Why were no surveys conducted in the first place?

Red-headed woodpeckers were observed and documented by DRN volunteer monitors at MP 93.5 – 93.6 and MP 95.1 on multiple occasions and multiple days throughout the breeding season. American kestrel, a threatened NJ bird, was also observed and nests near MP 95.0 to 96.0 along Sanford Rd, NJ.

Monarch butterflies are abundant and observed by volunteer monitors on August 12, 2016 near MP 95.0-96.0 along a preserved farm on Sanford Road that has been managing a diverse and native meadow habitat for grassland birds, pollinators and wildlife for several years and that borders a mature forest adjacent an UNT to the Wickecheoke, a C1 stream in NJ. Native plants observed (not complete list) in the meadow included: *liatris*, goldenrod, cardinal flower, pickerel weed (in stream), ironweed, wool grass, deer tongue, dogbane milkweed, sensitive fern, aster, wood aster, jewel weed, big blue stem, and sedges and rushes in low lying wetland areas present in the meadow. Shagbark hickory among many other native mature trees are growing in the woods on the property that would be cut and bats have been observed by the landowners.

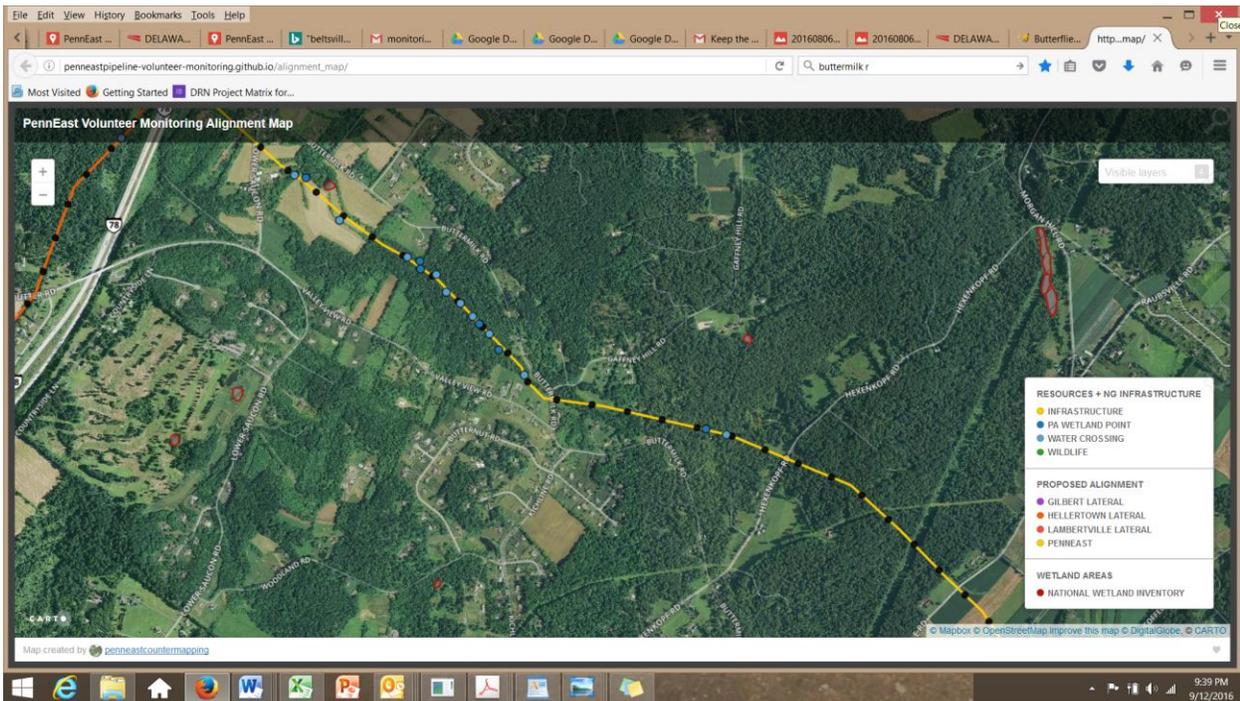


One of over 12 monarchs observed in 20 mins in native meadow and tree line (approx. MP 95/96)



MP 73.5 – 74.0 volunteer surveys have documented sensitive large wetland and stream complexes habitat in this HQ-CWF watershed of Frya Run. Sensitive groundwater seeps are also present in this area and a diverse selection of native plants are present. This forested wetland is an important large wetland that PE estimates will have a 381 ft open cut crossing and impact 0.61 acres. It is dominated by mature forest with mostly native plants. Frya run is a wild trout stream and therefore wetlands may be Exceptional Value. Photos are available upon request. Another large PFO wetland is located near MP 72.7 with a crossing of 1,114 feet and disturbance of 0.36 acres and also an open cut. Based on the two crossings widths are the acreage sizes reversed in the DEIS? It is unacceptable to have these forested wetlands that are near one another (see map below) be proposed for an open cut when HDD could be an option.

Nearby and south of the wetlands the sister Hexenkopf Rock with steep slopes has historical significance and local lore. Legend has it that this area was an important spiritual place for first nations and today has a draw of visitors.



MP 72.5 to 73.0 note abundant stream and forested wetland crossings that are proposed for open cut. The two blue dots to the right are also large proposed crossings that have been documented to be of high quality habitat (approx. 73.5 and 73.6).

DRN and trained volunteer monitors will continue to provide information to FERC and agencies to continue to illustrate the vast gaps and habitat that are in the path of the proposed route to further illustrate that this harm is too great to build the pipeline.

Respectfully submitted on behalf of our volunteer monitors and concerned landowners who provided field truthing and photo-documentation to assist in the review of the DEIS.

Faith Zerbe
 Director of Monitoring
 Delaware Riverkeeper Network