

PennEast Pipeline Company, LLC
One Meridian Boulevard, Suite 2C01
Wyomissing, PA 19610



November 3, 2015

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: PennEast Pipeline Company, LLC, Docket No. CP15-558
Data Request Response

Dear Ms. Bose:

PennEast Pipeline Company, LLC (“PennEast”) hereby submits its response to the data request issued by the Federal Energy Regulatory Commission (“Commission”) Staff on October 30, 2015 in the above-referenced proceeding.

If you have any questions regarding this filing, please contact me at (610) 406-4322.

Sincerely,

/s/ Anthony C. Cox

Anthony C. Cox

PennEast Pipeline Company, LLC

By its Project Manager

UGI Energy Services, LLC

Enclosure

cc: Medha Kochhar (FERC)

Data Request Number	Section & Page Number	Comment	Response: Section & Page Number
Revised Draft Resource Report 1 – General Project Description (8/24/2015)			
1	Section 1.3.1; Page 1-17; Table 1.3-1	Provide footnote 2 as it is missing from Table 1.3-1.	Section 1.3.1 Table 1.3-1 Page 1-19
2	Section 1.2.1; Page 1-11; Table 1.2-3	The length of mainline is inconsistent with Table 1.3-2 for the Upper Delaware River Basin. For both tables, include breakdowns of laterals.	<p>Table 1.2-3 provides just the mainline and does not include laterals.</p> <p>Table 1.3-2 includes both the mainline and lateral pipeline length in each river basin.</p> <p>All lateral facilities are located in the Upper Delaware River Basin.</p> <p>Section 1.2.2 Table 1.2-4 Page 1-15 shows the breakdown of mainline and laterals by river basin.</p>
3	Section 1.4.3.1; Page 1-56	The second paragraph states that “Unforeseen impacts from events such as...should be avoided due to the results of the various studies being conducted.” In the appropriate sections, discuss each study being performed and how PennEast would utilize these studies to minimize impacts on geologic resources.	Section 1.4.3.1 Page 1-56
4	Section 1.5	Provide a detailed construction work schedule.	Section 1.5.1 Pages 1-63 to 1-64
5	Section 1.5.1; Page 1-61	It is stated that clearing of trees would commence in the winter followed by grading, trenching, and other crews until restoration is complete. If construction during the winter months is anticipated, provide a Winter Construction Plan.	Section 1.5.1 Page 1-64

Data Request Number	Section & Page Number	Comment	Response: Section & Page Number
6	Section 1.5.1.4; Page 1-63	Explain the statement, “depth of cover for the proposed pipeline facilities...will be in accordance with PennEast’s minimum specifications.” What are these specifications; and how and why are they in compliance or different from U.S. Department of Transportation requirements.	Section 1.5.1.4, Page 1-66, notes that the depth of cover will be of sufficient depth to allow for the minimum cover requirements to the top of the pipe in accordance with USDOT regulations pursuant to the Natural Gas Pipeline Safety Act of 1968, as amended.
7	Section 1.5.2.1; Page 1-65	In tabular format, identify all locations where PennEast would request an alternative measure from the FERC <i>Upland Erosion Control, Revegetation, and Maintenance Plan</i> (FERC Plan) and <i>Wetland and Waterbody Construction and Mitigation Procedures</i> (FERC Procedures). The table should include a description of the action, location, and justification for the variance.	Section 1.5.2.1 Table 1.5-2 Page 1-69 to 1-82
8	Section 1.5.2.1; Page 1-66	Provide the timing restrictions set forth in New Jersey Administrative Code 7:13-10.5(d) of the NJ Flood Hazard Area Control Act Rules and identify how these differ from the FERC Procedures.	Section 1.5.2.1 Page 1-83
9	Section 1.5.2.4; Page 1-67	Provide locations where blasting in waterbodies would occur. As appropriate, provide a full environmental analysis of potential impacts on fish resources, water quality, and any other resource potentially affected.	Resource Report 2, Section 2.3.3.1 page 2-31 provides an overview of trenching and blasting. Appendix C, Part 7 provides Waterbody Site Specific Plans and Appendix O, Section D provides the Blasting Plan.
10	Section 1.5.2.8; Page 1-68	Provide the results of the evaluations for the 5 major waterbody crossings. Each crossing should have a site specific detail drawing of the crossing method including the location of additional temporary work spaces (ATWS).	Appendix C Part 7 provides Waterbody Site Specific Plans and Part 10 provides HDD plans and Appendix O Part A address HDD geotechnical studies and Part B discusses HDD feasibility.
11	Section 1.5.2.8.2; Page 1-69	Provide lengths for each of the horizontal directional drills (HDDs) identified in Table 1.5-2. In addition, provide the results of the geotechnical investigations for each of these sites.	Section 1.5.2.8 Table 1.5-3 Page 1-87 Appendix O

Data Request Number	Section & Page Number	Comment	Response: Section & Page Number
12	Section 1.5.2.8.2; Page 1-69	Include site-specific HDD crossing plans, an HDD contingency plan in the event of a failure, and an Inadvertent Return Response Plan in the case of "frac-outs."	Appendices E and O
13	Section 1.5.4; Page 1-86	Clearly state whether or not PennEast would participate in FERC's third-party construction compliance monitoring program.	Section 1.5.4 Page 1-110
14	Section 1.6; Page 1-87	Provide the locations for anode beds and test stations, including description of land cover.	To be provided with final design.
15	Section 1.10; Page 1-99	Identify any non-jurisdictional facilities, including water or electrical transmission lines, which would be needed to supply the proposed compressor stations, meter stations, mainline valves, or cathodic protection beds. For each non-jurisdictional facility, include: <ul style="list-style-type: none"> a. description and dimensions; b. company/owner; c. maps showing location; d. construction schedule; and e. environmental reviews, and permits required and their status. 	Section 1.10 Page 1-156
Draft Resource Report No. 2 – Water Use and Quality (5/19/2015)			
1	Section 2.2.1 Table 2.2-4 Page 2-9	Table 2.2-4 lists seeps and springs that might be impacted by the Project. For each spring or seep listed, also identify the waterbody or wetland and its classification and water quality category (HQ-CWF, WWF etc.) to which it discharges.	Section 2.2.1 Page 2-9 Noting that "None of the currently identified features in Table 2.2-4 are associated with a waterbody or wetland and as such do not have a water quality category associated with them."
2	Section 2.3.1 Page 2-17	Include a definition of the terms intermittent, perennial, and ephemeral; and, include an explanation of any differences in how these definitions are applied in Pennsylvania and New Jersey. Update the waterbody table and Appendix 2A as needed based on these definitions.	Section 2.3.1 Page 2-22

Data Request Number	Section & Page Number	Comment	Response: Section & Page Number
3	Section 2.3.1.1 Table 2.3-2 Page 2-18	An Open Water (OW) classification is listed in Table 2.3-2. Include a definition for this classification and explain why it is listed if no impacts to the OW category are expected.	The classification has been included to address the 2 OW features within the construction work area. Section 2.3.1 Table 2.3-2 Page 2-22
4	Section 2.3.2 Table 2.3-7 Page 2-23	Section 2.3.2 states that a minimum of a 15-foot-wide vegetated buffer would be maintained between the cleared pipeline right-of-way and a parallel waterbody. Table 2.3-7 lists the distance from waterbody to workspace as "TBD." Identify, by closest milepost location, all waterbodies that would be parallel to the pipeline right-of-way and the vegetated buffer that would be maintained.	Section 2.3.2 Table 2.3-7 Page 2-27
5	Section 2.3.2.2 Page 2-24	The Susquehanna River is listed as a major waterbody that would be crossed by HDD; however, Table 2.3-8 identifies an open cut/dam and diversion crossing technique for this river. Confirm the proposed crossing method for the Susquehanna River.	Sections 2.3.1.1 and 2.3.2.2 Tables 2.3-4 and 2.3-8 Pages 2-4 and 2-30
6	Section 2.3.2.1 Page 2-24	What, if any, time limits would be incorporated into dry crossing plans to minimize the duration of waterbody impacts from each crossing?	Sections 2.3.2.1 and 2.3.3.1 Pages 2-28, 2-31 to 2-32
7	Section 2.3.2.2 Table 2.3-8 Page 2-24	Identify in Table 2.3-8 those waterbodies for which PennEast would prepare site-specific crossing plans. Include a copy of the site-specific plans.	Section 2.3.2.2 Table 2.3-8 Page 2-30 Appendix C
8	Section 2.3.3.1 Page 2-25	Include additional information about any in-stream timing restrictions that would have to be met where blasting would be required for waterbody crossings.	Section 2.3.3.1 Page 2-31
9	Section 2.3.4.7 Page 2-32	Section 2.3.4.7 includes conflicting information on whether or not polychlorinated biphenyl's (PCBs) may be present in sediments within waterbodies crossed by the project. Clarify this information, and identify which waterbodies may contain PCB contamination and how PennEast proposes to address potential PCB presence.	Section 2.3.4.7 Pages 2-40 to 2-43
10	Section 2.4.1 Page 2-36	Include a definition of "adequate flow rates for the protection of aquatic life."	Section 2.4.1 Page 2-46

Data Request Number	Section & Page Number	Comment	Response: Section & Page Number
11	Section 2.4.1 Table 2.4-1 Page 2-36	Identify the location and source of hydrostatic test water and discharge points.	Section 2.4.1 Table 2.4-1 Page 2-48 to 2-51
12	Section 2.5 Page 2-37	Include information on regulated vernal pools potentially affected by the project. Include a table listing currently mapped vernal pools that would be crossed include beginning milepost and crossing length.	Section 2.5 Page 2-52 to 2-53 Table 2.5-1 Appendix 2C
13	Section 2.5.1 Page 2-38	Include the wetland acreages that would be affected by construction and operation of the Project by wetland types.	Sections 2.5.1 and 2.5.3 Table 2.5-1 Page 2-53 to 2-54
14	Section 2.5.4 Page 2-40	Include the estimated total acreage conversions of forested (PFO) and scrub-shrub (PSS) wetlands to emergent (PEM) wetlands for the Project.	Section 2.5.3 Page 2-56
15	Appendix 2A-1	Define the PA Code Designation of "EV."	Section 2.4.1 Page 2-46 Appendix 2C
16	Appendix 2A-1	Identify if any of the waterbodies listed as being classified as trout stocked fisheries (TSF) are subject to annual stocking periods.	Section 2.3.3.1 Page 2-31
17	Appendix 2A-1	Identify any Class A, Wilderness and Wild Trout Stream classifications in the crossing table, as applicable.	Appendix 2A
18	Appendix 2A-1 and 2A-2	Identify which (if any) of the crossings would be within a tidally influenced section of the waterbody.	Section 2.3.1.3 Page 2-26
Draft Resource Report No. 3 – Fisheries, Vegetation and Wildlife (5/19/2015)			
1	Section 3.2 Page 3-4	Define and describe New Jersey Department of Environmental Protection (NJDEP)-classified C1 waters and how the Project would affect them	Section 3.2 Page 3-4 Preliminary impacts to C1 waters are identified in Resource Report 2, Appendix 2A, Table 2A-2. Specific impacts will be assessed once field surveys are completed and addressed in the NJDEP permit applications.

Data Request Number	Section & Page Number	Comment	Response: Section & Page Number
2	Section 3.2.2 Page 3-8	Identify which waterbodies crossed by the Project would be subject to the National Marine Fisheries Service in-water work exclusion between March 1 and June 30 to be protective of striped bass, alewife herring, blueback herring, and American shad.	Section 3.2.2 Page 3-8
3	Section 3.2.2 Table 3.2.6 Page 3-10	Update Table 3.2.6 to include waters designated as FW1-TP in the trout designation waters that would be crossed by the pipeline.	No FW1-TP designated waters would be crossed by the pipeline.
4	Section 3.2.2 Page 3-10	Table 3.2-6 does not list any Trout Production waters as being crossed by the Project; however, Table 2.3-10 in Resource Report 2 lists eight FWC-TP waters would be crossed. Reconcile this difference.	New Jersey FW2-TPC1, Freshwater, trout-production, C- 1 streams are listed in Resource Report 2, Table 2.3-10 and Appendix 2A, Table 2A-2. While this updated information is accurately presented, it was not updated in Table 3.2-6 of Resource Report 3. This inconsistency will be reconciled in a supplemental filing.
5	Section 3.2.2 Table 3.2-6 Page 3-10	In Table 3.2.6, the numbers of FW2-NTC, FW2-TMC1, FW2-TPC1, FW2-NT and FW2-TM waters that would be crossed by the Project do not match the crossings listed in Table 2.3-10 of Resource Report 2. Reconcile this difference.	The data summarizing New Jersey Water Quality Classifications and Trout Designation Waters Crossed by the Pipeline Facilities was updated as the Project footprint was refined during the later portions of the design process. While this updated information is accurately presented in Table 2.3-10 of Resource Report 2, it was not updated in Table 3.2-6 of Resource Report 3. This inconsistency will be reconciled in a supplemental filing.
6	Section 3.2.3 Page 3-10	Explain the potential impact on recreational fishing in trout stocked waters. Consider the planned construction and restoration schedule and stocking and fishing seasons, and potential impact on access points used for recreational fishing.	Section 3.2.3 Page 3-11

Data Request Number	Section & Page Number	Comment	Response: Section & Page Number
7	Section 3.2.1 Table 3.2-3 Page 3-8	The Pennsylvania Fish and Boat Commission lists striped bass, American eel and American shad as migratory species of concern. Explain whether blueback herring and alewife should also be considered migratory species of concern in Pennsylvania since they are listed as migratory species of concern in New Jersey.	Section 3.2.1 Included within Table 3.2-3 Page 3-7
8	Section 3.3-1 Page 3-12	Include the results of all field surveys referenced in draft Resource Report 3, and update text and tables as needed to incorporate field survey results.	Section 3.3.1, Section 3.4, and Section 3.5
9	Section 3.3.1 Table 3.3-2a Page 3-13	Include revised Table 3.3-2a with the last two columns filled in correctly.	Section 3.3.1 Table 3.3-2a Page 3-14 to 3-15
10	Section 3.3.1.1 Page 3-17	Describe vernal pools as a vegetation community of special concern, the Project's potential impacts on them, and any proposed mitigation.	Section 3.3.1.1 Page 3-22
11	Section 3.3.2 Page 3-22	Include additional information about invasive species, including which species could potentially be an issue within the project area and the measures PennEast would implement to prevent or minimize their introduction.	Section 3.3.1.2 Page 3-29 to 3-30
12	Section 3.3.2 Page 3-22	Include additional information about the impact on wildlife due to conversion of forested habitats to open field right-of-way. Identify which species could be most impacted by this conversion.	Section 3.3.2 Pages 3-30 to 3-31 and Section 3.4.2 Page 3-48
13	Section 3.3.1.1 Page 3-21	Explain the NJDEP- Endangered and Nongame Species Program criteria for classification of vernal pools, and how the Project may impact these criteria where the pipeline crosses vernal pools. Include information on plans to avoid or minimize impact on vernal pools, and plans for restoration of vernal pools that cannot be avoided.	Section 3.3.1 Page 3-28
14	Section 3.3.2 Page 3-22	Include a copy of PennEast's project-specific restoration plan as referenced in Section 3.3.2.	To be provided upon completion of permit applications
15	Section 3.3.2 Page 3-22	Explain how PennEast would incorporate the requirements of the NJDEP's No Net Loss Reforestation Act into the Project restoration plans.	Section 3.3.2 Page 3-31

Data Request Number	Section & Page Number	Comment	Response: Section & Page Number
16	Section 3.5.1, Table 3.5.1 Page 3-31	In Section 3.4.1, the Eastern box turtle is noted as a representative species present in the area. Update Table 3.5.1 and Section 3.5.1.3 to include the Eastern box turtle because it is a species of special concern in the state of New Jersey.	Section 3.5.1 Table 3.5-1 Page 3-52
17	Section 3.5.1.3 Page 3-43	Update Section 3.5.1.3, as needed, to address the potential presence of and potential impact on the dwarf wedge mussel in New Jersey.	Section 3.5.1.1 Table 3.5-1 Page 3-58
Draft Resource Report 4 – Cultural Resources (5/29/2015)			
1	Section 4.3.1.2 Page 4-3	Clarify if the archaeological field approach currently being applied to the ongoing archaeological field studies is reflective of a revised site sensitivity model that has been approved by New Jersey Historic Preservation Office (NJ HPO).	Section 4.3.1.2 Page 4-3 and Section 4.7.2.1 Pages 4-28 to 4-30 See also Appendix J: New Jersey Phase I Archaeological Survey Report Page 34
2	Section 4.5.2	Include site avoidance plans for all archaeological sites that the planned Project proposes to avoid.	Appendix J: Pennsylvania Phase I Archaeological Survey; New Jersey Phase I Archaeological Survey Report
3	Appendix 4A	Include copies of all letters sent to and received from Native American tribes in addition to the summary spreadsheet in Appendix 4A.	Appendix G
4	Section 4.3	Include documentation of PennEast’s consultation with local historical advisory committees such as the Delaware Township Historic Advisory Committee, and local historical societies about their concerns related to NRHP-listed and –eligible sites that may be affected by the Project.	Section 4.5 Table 4.5-1 Pages 4-5 to 4-19
5	Section 4.5.3	Describe how PennEast would minimize or avoid impacts to aboveground cultural resources, such as the Delaware Canal, historic covered bridges, and other resources, that may be vulnerable to effects from vibration.	Section 4.6 Page 4-20

Data Request Number	Section & Page Number	Comment	Response: Section & Page Number
6	Section 4.5.3	Identify the effects the Project may have on historic landscapes including locations such as Revolutionary War-era battle sites, military encampments, and mapped locations of historic troop movements, the Crossroads of the American Revolution National Heritage Area (NHA) and the Delaware and Lehigh National Heritage Corridor (NHC). Provide procedures to avoid or minimize effects.	Section 4.5, Table 4.5-1 Pages 4-6, 4-7 and 4-16 to 4-19
7	Section 4.5.2	Include NJ HPO and Pennsylvania Historical and Museum Commission (PHMC) reviews of all archaeological reports, Phase II archaeological investigation work plans, and reports presenting the results of Phase II investigations, along with NJ HPO and PHMC comments on these reports.	PHMC and NJ HPO comments submitted October 2015
8	Section 4.5.3	Include the results of all historic architecture and landscape studies performed in the Project Area of Potential Effects (APE) for indirect effects, and provide the comments of the NJ HPO and PHMC on all historic architecture and landscape reports.	Appendix J: Pennsylvania Architectural History Reconnaissance Report; New Jersey Architectural History Reconnaissance Report
9	Section 4.5.3	Address impacts to the historic districts that would either be crossed by the Project or that are within the viewshed of the Project and provide procedures to avoid or minimize impacts.	Section 4.5 Table 4.5-1 Pages 4-10 4-11, 4-15 and 4-16
Draft Resource Report 5 – Socioeconomics (5/29/2015)			
Population			
1	Section 5.3.2 Pages 5-3, 5-4	Estimate the number of temporary and permanent jobs that would be generated during construction of the Project. Include a breakdown of temporary Project-related construction jobs by month and construction spread. (Note the overall estimates of workers are not consistent between draft Resource Report 1 and 5, see for example p. 1-67 of draft Resource Report 1).	Section 5.3.2 Table 5.3-3 Pages 5-3 to 5-5
2	Section 5.3.2 Pages 5-3, 5-4	Estimate the share of the construction workforce expected to temporarily or permanently relocate to the Project area and the duration of their stay.	Section 5.3.2 Page 5-3
3	Section 5.3.2 Pages 5-3, 5-4	Estimate the number of workers expected to temporarily relocate to the Project area that would be accompanied by family members.	Section 5.3.2 Page 5-3

Economy, Employment and Income			
4	Section 5.4.2 Pages 5-6 to 5-9	Many commenters expressed concern about the conclusions of the Econsult Solutions Inc. and Drexel University economic impact analysis, which estimates that construction of the Project would support a total of 12,160 jobs. The fact sheet on PennEast's web site states that "slightly less than half (of these jobs) would be in industries other than construction." This implies that more than 6,000 jobs would be in the construction sector. This appears to conflict with other estimates presented in draft Resource Report 5 of 2,500 people employed during construction. Explain this apparent discrepancy.	Section 5.4.2 Page 5-8
5	Section 5.4.2 Pages 5-6 to 5-9	The Econsult and Drexel University study identifies a total construction labor cost of \$733 million. Identify the components of this cost (e.g., wages and salaries, benefits, per diem payments, etc.) and the share of this cost expected to be spent locally (within the six counties that would be crossed by the pipeline).	Section 5.4.2 Table 5.4-5 Page 5-9 to 5-10
Agriculture and Timber			
6	Section 5.5.2 Pages 5-9 and 5-14	Estimates of temporary impacts to agricultural land assume that impacts would last for three years. Include an explanation for the selection of three years.	Appendix Q Section 1.4.4 Page Q-5
7	Section 5.5.2 Pages 5-13 to 5-15	Draft Resource Report 5 does not appear to consider the value of agricultural land that would be permanently impacted by the Project. Confirm that no agricultural land would be permanently removed from production or otherwise permanently impacted as a result of the Project, or include a description of any agricultural land that would be permanently removed from production. Confirm that the acres temporarily impacted by county listed in Table 5.5-6 match those in draft Resource Report 8 Table 8.2-2, and if not, clarify the discrepancy.	Section 5.5.2 Page 5-15 to 5-16
8	Section 5.5.2 Pages 5-14, 5-15	Address public concerns that construction and operation of the Project would result in organic farmers losing organic certification. Draft Resource Report 8 states that no certified organic farms would be crossed (Section 8.3.4.3, p.8-84), while draft Resource Report 5 suggests this might not be the case (p. 5-14). Address this apparent discrepancy.	Section 5.5.2 Page 5-17

Conservation Lands			
9	NA	Address public concerns that the Project would negatively affect public and private conservation lands and other public lands that have been preserved in their current condition through public and other sources of funding. Section 8.3.4.3 in draft Resource Report 8 (p. 8-89) identifies Conservation Lands that would be affected by the Project (as well as other lands identified during scoping that would not be crossed by the Project). Assess the social and economic impacts associated with temporary (construction) and permanent impacts to these lands.	Section 5.8.3 Page 5-24
Recreation and Tourism			
10	Section 5.6.2 Page 5-16	Many people commenting expressed concern that the Project would affect the local recreation and tourism-based economy because it would have detrimental effects on the natural beauty of the affected area, public lands, and specific recreation resources. Assess the potential for these types of impacts to affect the recreation and tourism.	Section 5.6.2 Pages 5-18 to 5-19
Housing			
11	Section 5.7.2 Page 5-18	Estimate housing demand by workers temporarily relocating to the area by housing type (e.g., hotel/motel rooms, rental housing, RV camping spaces) and construction spread. The distribution of workers by housing types may be estimated based on past experience with similar projects.	To be provided once construction contractor is selected
12	Section 5.7.1 Pages 5-17, 5-18	Estimate the available supply of hotel and motel rooms and identify typical vacancy rates during the construction season. Comprehensive data are available from hotel industry research firms, such as STR (STR.com).	Section 5.7.1 Table 5.7-3 Page 5-21
13	Section 5.7.2 Page 5-18	Assess the potential for construction workers to displace tourists in the affected areas.	Section 5.7.2 Page 5-22
Land Acquisition/Displacement			
14	NA	Address public concerns that the Project would affect the ability of landowners to subdivide or develop their property in the future.	Section 5.8.2 Page 5-23
15	Section 5.8.2 Page 5-20	PennEast states that it would maintain insurance coverage that extends to landowners. Explain how this coverage protects affected landowners.	Section 5.8.4 Page 5-25

Taxes and Revenues			
16	Section 5.10.2 Pages 5-24, 5-25	Estimate the dollar value of tax revenues to be paid to each municipality and state affected by construction and operation of the Project, include property taxes (where applicable), sales and use taxes, and income taxes.	Section 5.10.2 Table 5.10-2, Table 5.10-3, Table 5.10-4, Table 5.10-5 Pages 5-29 to 5-30
Transportation			
17	Section 5.11.2 Pages 5-25, 5-26	Determine the effect of the movement of construction equipment, materials, and workers on local road networks. Identify the roads that would be used during construction. Estimate construction-related traffic trips to and from the work sites, frequency of the trips over the construction period, and times of peak traffic volumes.	Section 5.11.2; Traffic Management Plan to be provided once construction contractor is selected
18	Section 5.11.2 Pages 5-25, 5-26	Evaluate potential physical impacts to existing roads and bridges.	Section 5.11.2; Traffic Management Plan to be provided once construction contractor is selected
19	Section 5.11.2 Pages 5-25, 5-26	Identify the measures that would be used to mitigate potential transportation-related impacts. Potential measures include construction of new roads, repair of roads to pre-construction conditions, avoidance of existing peak traffic periods, detours, consultation and coordination with local authorities, signage, and notification in newspapers.	Section 5.11.2; Traffic Management Plan to be provided once construction contractor is selected
Environmental Justice			
20	Section 5.12 Pages 5-26 to 5-29	Identify areas along the proposed pipeline route (by census block group) that contain potential low income or minority populations. Include a listing of the census block groups that would be crossed or otherwise affected by the Project.	Section 5.12 Pages 5-31 to 5-35
21	Section 5.12 Pages 5-26 to 5-29	Explain how the pipeline route was selected and how low income and/or minority populations were considered in this process.	Section 5.12 Page 5-35
22	Section 5.12 Pages 5-26 to 5-29	Describe community outreach and public involvement processes and how low income and/or minority populations were considered as part of these processes.	Section 5.12 Page 5-35

Cumulative Effects			
23	Section 5.13 Pages 5-29, 5-30	Assess the potential cumulative effects of the Project in conjunction with past, present, and reasonably foreseeable projects, including the projects identified in Table 1.4-1 of draft Resource Report 1. Assess the extent to which the Project in conjunction with these and other relevant Projects (past, present, and reasonably foreseeable) would affect socioeconomic resources in the affected areas.	Section 5.13 Pages 5-35 to 5-37
Draft Resource Report 6 – Geologic Resources (5/29/2015)			
1	Section 6.1 Page 6-1	Include a written geologic background. This background should include regional geologic/tectonic history that accounts for topography, distinguished landforms and relative relief and why rock types (i.e. carbonates) in the area are present. Both the bedrock and surficial geology should be described.	Sections 6.1.1 and 6.1.2 Pages 6-1 to 6-3
2	Section 6.1 Table 6.1-1 Figure 6.1-2 Page 6-1	Include a short written description/summary of the various Physiographic Provinces crossed.	Section 6.1.2.1 Table 6.1-1 Figure 6.1-3 Pages 6-3 and 6-4
3	Section 6.1 Table 6.1-1 Figure 6.1-1 Page 6-2	Include a column in Table 6.1-1 that includes the geologic formation symbol identified on Figure 6.1-1.	Section 6.1.4 Table 6.1-1 Pages 6-7 to 6-21
4	Section 6.1 Table 6.1-2 Page 6-14	Include a figure illustrating the surficial geology by milepost (MP).	Section 6.1.2 Figure 6.1-2 Overview Map and Figures, Pages 1 to 32, are located at the end of the Resource Report
5	Section 6.2 Page 6-17	Include a table and/or figure identifying abandoned and reclaimed mines within 0.25 miles of the pipeline.	Figure 6.2-1 Table 6.2-1 Page 6-27
6	Section 6.2	Include text and a table/figure that identify oil and gas wells within 0.25 miles of the pipeline.	Section 6.2.2 Page 6-28
7	Section 6.3.4 Page 6-21	The maps of mines in the Project area obtained for siting and design should be included and a discussion of potential impacts from the installation of the pipeline.	Section 6.3.5 Figure 6.2-1 Table 6.2-1 Page 6-27

8	Section 6.3.4 Page 6-21	Include a figure that “report the presence or absence of sinkholes for the Project Area.” Include MP markers and use an appropriate scale to these areas.	Figure 6.3-4
9	Section 6.3.7 Table 6.3-4 Page 6-24	Update table to reflect the total percentage of the pipeline route underlain by shallow bedrock and describe in the text.	Section 6.3.8.2 Table 6.3-4 Pages 6-40 to 6-44
10	Section 6.3.7 Page 6-24	Included the blasting plan and specify federal, state and local regulations along with what permits would need to be obtained and from whom. Any potential impacts from blasting should also be described here. To assess these impacts on all these resources pre- and post-blast monitoring procedures should be described, including any potential mitigation.	Appendix O
10	Section 6.3.7 Page 6-24	Include a plan to monitor subsidence in the karst terrain before, during and after construction if geophysical/geotechnical investigations indicate it is needed.	Section 6.3.4 Page 6-34
11	Section 6.3.7 Page 6-24	Describe how the Project would be designed to minimize risks from potential geologic disturbances.	Section 6.3.8 Pages 6-38 to 6-39
12	Section 6.3.7 Page 6-24	Describe how blasting rock waste would be handled in relation to overlying soils and potential disposal use options.	Section 6.3.8.1 Page 6-38
Draft Resource Report 7 – Soils (5/29/2015)			
1	Section 7.1.1 Page 7-1	Include a summary of the regional soil interpretation based on the Major Land Resource Areas.	Section 7.2 Tables 7.2-1 Page 7-186
2	Section 7.1.1 Table 7.1-2 Table 7.2-1 Page 7-1	Update tables to include columns for ‘prime farmland’, hydric’ and average slope and compaction. In addition, summarize the percentage of each of these categories for the route.	Section 7.2 Table 7.2-1 Page 7-186
3	Section 7.1.2 Page 7-2	Include the percentage of soil permanently disturbed at each station.	Section 7.1.2.1 Page 7-5
4	Section 7.3 Page 7-3	Identify areas that may be potentially impacted from construction vehicles and trenching in regards to irrigation systems and drainage tiles in both text and table.	Section 7.5.2 Page 7-10
5	Section 7.4 Page 7-4	Include a description of topsoil segregation methods, as well as trench backfill methodology. This should include methods to reduce the size and presence of rock near the surface.	Appendices E and Q
6	Section 7.5 Page 7-4	Describe the specialized construction methods that may be used to avoid soil impacts.	Section 7.4 Pages 7-7 to 7-9
7	Section 7.5 Page 7-4	Describe how the fertility of prime farmland would be restored if identified.	Section 7.5.1.1 Page 7-10

8	Section 7.5 Page 7-4	Include consultation with local soil experts and describe additional methods to mitigate impacts on compacted soils.	Appendices E and Q
9	Section 7.5 Page 7-4	Describe how PennEast would mitigate impacts on drainage tiles and irrigation systems if encountered during construction.	Section 7.5.2 Page 7-10
10	Section 7.5 Page 7-4	Describe construction methodologies and mitigation measures for impacts on hydric soils.	Appendix E
11	Section 7.5 Page 7-5	Identify the NRCS office or other agencies consulted to develop these plans and include consultation.	Section 7.4.1 Page 7-8 Appendix G-1
Revised Draft Resource Report 8 – Land Use, Recreation, and Aesthetics (8/24/2015)			
17	Section 8.2.1.1; Page 8-5	Include a table identifying any locations where ATWS would extend beyond the typical 100-foot-wide corridor in order to maintain safe construction practices, and explain why they would be needed. Include a table identifying locations where reductions or “neck-downs” of the construction right-of-way would be necessary due to specific environmental or residential constraints.	Section 8.2.1.1 Table 8.2-3 Pages 8-5 to 8-25
18	Section 8.2.1.1; Pages 8-6 to 8-8	Confirm that Table 8.2-2 includes the acreage for topsoil staging in agricultural land. If not, include this as part of the acreage estimates.	Section 8.2.1.1 Table 8.2-2 Pages 8-6 and 8-7
19	Section 8.2.1.4; Page 8-36; Table 8.2-5	A total of 261.9 acres are identified as being within ATWS along the route. The text states that these areas will be restored to existing land use. Given that many of the impacted ATWS areas are forested, indicate whether and how PennEast would restore forested ATWS areas. Provide details about restoration with native woody plantings and include planting plans.	Section 8.2.1.4 Page 8-29
20	Section 8.2.2.1; Page 8-88	Provide additional details on zoning and proposed development plans, if any, for the newly identified 40-acre compressor station site in Carbon County, PA.	Section 8.2.2.1 Page 8-67

21	Section 8.3; Pages 8-92 to 8-93 and 8-97	<p>Table 8.3-2 states that the Susquehanna Estates Subdivision Project is on hold; however, construction was ongoing during the July 2015 site visit. Confirm that the planned route would avoid impacting planned construction in this area and/or provide mitigation measures to minimize potential impacts.</p> <p>Provide correspondence with the following businesses and individuals who identified residential or commercial development planned to occur in the Project area:</p> <ul style="list-style-type: none"> a. Barry Roth (potential development of a park between William Penn and Freemansburg Avenue in Bethlehem Township, PA); b. Jonathan Feinberg (RJA Investment Fund VIII, LP Subdivision); c. Thomas C. Kidd (Subdivision adjacent to Little Gap Estates in Palmerton, PA); d. Harry Salavantis (Susquehanna Estates in Jenkins Township, PA); and e. Philip Giebel (Huntington Knolls, LLC Housing Development). <p>Why are certain commercial and/or residential development projects included in Table 1.4-2 but not included in Table 8.3-2 and Section 8.3?</p>	Section 8.3.1 Page 8-71
22	Section 8.3.2; Page 8-98	Indicate whether PennEast has identified any residences within 25 feet of the construction right-of-way or extra work/staging areas. If so, include site-specific construction plans for those residences.	Section 8.3.2 Table 8.3-3 Page 8-77 to 8-98 Site-Specific Construction Plans to be provided in Appendix C
23	Section 8.3.3 Page 8-116	Include a plan to address traffic impacts. This plan should be developed in conjunction with local public safety officials and should address potential impacts to traffic, including school bus routes. This plan should specify the number of days construction activities would occur per week (5, 6, or 7 days/week).	Traffic Management Plan – to be provide once construction contractor is selected
24	Section 8.3.3; Page 8-116	Provide a response to landowner concerns regarding potential impacts to residencies including driveway access and horses.	Section 8.3.3 Page 8-99 to 8-100

25	Section 8.3.4; Page 8-117 Section 1.5.2.13; Page 1-77	Include an Agricultural Impact Minimization Plan prepared in consultation with the New Jersey Department of Agriculture and other resource management agencies as appropriate. The plan should identify measures that would avoid, minimize, and/or mitigate impacts on agricultural lands from construction and operation of the planned Project, and should identify compensation procedures. Additionally, the plan should address landowner concerns regarding the use of pesticides to maintain the right-of-way post-construction. Finally, this plan should clarify that certain crops and agricultural uses, such as fruit orchards, would not be permitted within the permanent right-of-way, if applicable.	Appendix Q
26	Section 8.3.4.3; Page 8-119	Respond to comments received regarding potential impacts to honeybees, particularly in regards to the use of pesticides to clear and maintain the right-of-way.	Section 8.2.1.1 Page 8-5
27	Section 8.4.1.1 and Section 8.4.1.2; Pages 8-120 to 8-125	Identify measures that would be used to minimize disturbance to the recreational areas and visitors at Francis E. Walter Dam, Beltzville State Park, Frances Slocum State Park, Hickory Run State Park, and Delaware Canal State Park, including the feasibility of timing construction during off-peak season to reduce impacts to recreational users. How have recommendations based on consultation with U.S. Army Corps of Engineers and Pennsylvania Department of Conservation and Natural Resources been incorporated into these plans? Provide an update on the status of the Section 408 process for crossing the Francis E. Walter Dam and Beltzville State Park.	Section 8.4 Pages 8-103 to 8-110
28	Section 8.4.1.1; Pages 8-121 to 8-122	Include a site-specific crossing plan developed in coordination with the National Park Service and other stakeholders for the crossing of the Appalachian National Scenic Trail at MP 51.2 in Northampton County, PA.	Site-Specific Construction Plans to be provided in Appendix C
29	Section 8.4.1.2; Page 8-124	Identify the measures PennEast would implement to minimize disturbance to the recreational areas and visitors at Pennsylvania State Game Lands, specifically State Game Land No. 168.	Section 8.4.1.2 Page 8-108
Revised Draft Resource Report No. 9 – Air and Noise Quality (8/24/2015)			
Air Quality			
30	Section 9.1.2; Page 9-12	Provide a copy of the focused arsenic risk assessment, as mentioned on p. 9-12, when available.	Appendix 6A of Resource Report 6

31	Page 9-14	It is stated on page 9-14 that the emission factors used for fugitive dust emissions estimates are based on the EPA reference document "Estimating Particulates Matter Emissions from Construction Operations" prepared by Eastern Research Group, Inc. September 30, 1999. Revise those emissions using EPA's newly released MOVES 2014 model which also incorporates the nonroad model or justify using the model stated above.	N/A: The MOVES2014 model does not provide fugitive dust emission factors. It only provides combustion exhaust emissions.
32	Page 9-17	It is stated in Section 9.1.5 that the emissions listed in Table 9.1-5 are assumed to occur over one calendar year. Provide the months of the construction activities that would reflect the emissions listed in Table 9.1-5.	Section 1.5 of Resource Report 1 The air emissions from these minor supporting activities are not quantified separately and they may or may not occur during the same calendar year. Pages 1-61 to 1-63 of Resource Report 1.
33	Appendix L	The construction emissions listed in Appendix L were based on the EPA's approved model of MOVES2014. However, some of the nonroad emissions footnotes refer to EPA's guidance published in 2004. Revise the factors used for nonroad emissions to the most current version of nonroad which is 2008.	The estimating approach for nonroad emissions uses the MOVES2014 factors as much as possible and the calculations and notes have been revised accordingly.
34	Section 9.1.5; Page 9-17	Update Table 9.1-5 as appropriate to reflect the fact that Luzerne County, PA is no longer designated as nonattainment for ozone or any other pollutant.	Section 9.1.5.2 Table 9.1-5 Pages 9-18 and 9-19
35	N/A	Provide Appendix L-1, Plan Approval Application for Compressor Station, when available.	A copy of the Plan Approval Application for Appendix L1 to be provided after it has been submitted to PADEP
36	N/A	What is the potential radon content of the pipeline gas? What is the possibility of release of radon into the air, into homes, and into drinking water supplies due to natural gas leaks from the Project?	Section 9.3 Table 9.3-1, item 9.3.2 Page 9-52
37	N/A	What are the potential health risks associated with Project hazardous air pollutant emissions, in particular from the compressor station operations?	Section 9.1.1.4, Page 9-9 addresses potential health risks and indicates that emissions will comply with federal and state requirements. Table 9.1-3a, Page 9-11 summarizes emissions for the compressor station.

38	N/A	Add a discussion of climate change impacts from the Project.	Section 1.4.3.9 of Resource Report 1 Pages 1-61 to 1-63 of Resource Report 1
39	N/A	Discuss the permanent loss of CO ₂ sequestration capacity due to removal of trees along pipeline route.	Section 9.3 Table 9.3-1, item 9.3.1 Page 9-52
40	N/A	Address the comment that natural gas production would result in greater greenhouse gas emissions than coal or oil use, when methane leakage from well sites and pipelines are considered.	Section 1.4.3.9 of Resource Report 1 Page 1-61 to 1-63 of Resource Report 1
41	N/A	Address the comment that cheap supplies of natural gas would slow the transition to renewable and non-fossil energy sources.	Section 1.4.3.9 of Resource Report 1 Page 1-61 to 1-63 of Resource Report 1
42	N/A	When available, provide a discussion addressing comments received from the public on air quality and noise, or indicate where these comments have been addressed in resource report 9 or when they will be addressed.	Section 9.3 Table 9.3-1 item 9.3.4 Page 9-54
Noise			
43	Section 9.2.2.2; Page 9-24	Conduct daytime and nighttime short-term ambient sound levels measurements at the closest noise sensitive areas (NSAs) to each proposed HDD entry and exit point. Calculate the ambient L _{dn} sound level using measurement data as opposed to using estimates determined with Federal Transit Administration guidance.	Sections 9.2.2.1 and 9.2.2.2 Pages 9-22 to 9-24
44	Section 9.2.2.3; Pages 9-25 to 9-28	Confirm that the “Econolodge and Pizza residence” are the closest NSAs within one mile of the proposed Compressor Station in each geographical direction. If there are additional NSAs to be included in the assessment, collect short-term daytime and nighttime ambient sound level data and predict Project noise impacts at those locations. In addition, revise Figure 9.2-2 to include any additional NSAs included in the assessment.	Section 9.2.2.3 Page 9-27
45	Section 9.2.2.3; Page 9-24	Indicate whether the Snow Ridge Village, Jack Frost National Golf Course, Hickory Run State Park, Beltzville State Park, and Carbon County Watershed would be within 1 mile of the Kidder Compressor Station or HDD activities. If so, provide an ambient and predicted noise analysis in Ldn.	Section 9.2.4.2.1.1 Table 9.2-12 Page 9-41

46	Section 9.2.2.3; Pages 9-27 to 9-28	Revise Table 9.2-3 to include L_{dn} sound level metrics for all short-term monitoring locations.	Newly entered L_{dn} values associated with ST measurements included in Table 9.2-3 Page 9-27 to 9-28
47	Section 9.2.3; Pages 9-28 to 9-29.	Indicate whether PA has state noise requirements and/or if there are any requirements at the county level.	Sections 9.2.3.2 and 9.2.3.3 Pages 9-29 and 9-30
48	Section 9.2.4.1.1; Page 9-33	Revise Table 9.2-8 to state the quantity of the equipment listed.	Table 9.2-8 Page 9-34
49	Section 9.2.4.1.2.2; Page 9-34	Describe the equipment assumed for use at the HDD entry and exit points.	Section 9.2.4.1.2.2 Table 9.2-10 Page 9-36
50	Section 9.2.4.2.1; Page 9-39	Provide sound contours displaying Project sound levels corresponding to operation at the Kidder Compressor Station at nearby NSAs and over the Project study area in Figure 9.2-3 or provide a new figure.	Section 9.2.4.2.1.1 Table 9.2-12 Page 9-41
51	Section 9.2.4.2.1; Page 9-36	For the Kidder Compressor Station, include sound level pressure levels for compressor station components such as un muffled engine inlets and exhausts, engine casings, and cooling equipment. Provide the manufacturer's name, the model number, the performance rating and a description of each noise source and noise control components to be employed at the Kidder Compressor Station. Provide this information when available if it's not available at the time the application is filed; and indicate when it will be available.	Tables 9.2-6 through 9.2-8 Pages 9-31, 9-33 and 9-34
52	Section 9.2.4.2.1; Page 9-36	For the Kidder Compressor Station, provide an evaluation of potential vibration impacts at NSAs within 1 mile of the compressor station.	Section 9.2.5 Page 9-47 to 9-48
53	Section 9.2.4.2.1; Page 9-40	Revise the ambient L_{dn} value listed in Table 9.2-12 to one measured baseline ambient L_{dn} value for each NSA. In addition, revise the total sound level accordingly.	Table 9.2-12 Page 9-41
54	N/A	Provide an analysis of potential noise impacts associated with blowdowns that would occur as part of Project operations and/or maintenance.	Section 9.2.4.2.1.2 Page 9-41 to 9-42

55	N/A	Provide an assessment of cumulative noise impacts of the Project in conjunction with other present or future developments within the Project study area.	Section 9.2.6 Page 9-48
Revised Draft Resource Report No. 10 – Alternatives (8/24/2015)			
56	NA	Provide maps of the existing Columbia Gas and Texas Eastern pipeline systems in the PennEast Project area that illustrate that these existing systems lack the capability to receive and deliver gas in the production region in which PennEast's receipt and delivery points would be located.	Section 10.2 Figure 10.2-1 Page 10-12
57	Sections 10.3.1 and 10.3.2; Pages 10-16 and 10-61	Provide revised Sections 10.3.1 and 10.3.2 that include comparisons of each pipeline alternative and each major pipeline alternative to PennEast's planned pipeline route or the corresponding segment of planned route. Include comparative text, tables, and figures to support the analysis.	Section 10.3 Appendix P
58	Section 10.3.2; Page 10-82; Table 10.3-18	For the following route Variation Nos. listed in Table 10.3-8, provide a written comparison of the route variation and the corresponding segment of planned route. Provide a figure for each route variation with milepost markers labeled on the planned route, and a table comparing environmental and engineering features. Be sure the planned route segment evaluated against each variation is the same as the planned route included in resource report 1 (i.e., if a route variation listed in Table 10.3-18 was "implemented" then that segment of pipeline should be described as the planned route in the comparison analysis). Provide this information for Variation Nos: 5, 6F, 6G, 6H,8,9,12, 17A, 17B, 17C, 18, 19, 23A, 26, 26A, 27, 29A, 34, 35A, 39, 40, 40A through 40E, 41, 41A, 41B, 45A, 48, 50, 50A, 51, 55, 55A, 60, 61, 65, 69, and 71 through 84.	Appendix P Table 10.3-18
59	NA	Evaluate an alternative route that would avoid the wellhead protection area at milepost 87.2. The alternative should evaluate the potential for the pipeline route to shift east near milepost 85.7, continuing east until after the crossing of Route 513 (Everittstown Road). At the back edge of the property east of Route 513, the route would then shift south until meeting back up with the planned route.	Appendix P