

GEO-TECHNOLOGY ASSOCIATES, INC.

GEOTECHNICAL AND
ENVIRONMENTAL CONSULTANTS

A Practicing Geoprofessional Business Association Member Firm



May 17, 2024

Delaware Department of Natural Resources and Environmental Control
Delaware Coastal Programs
100 West Water Street, Suite 7B
Dover, Delaware 19904

Re: Coastal Zone Management Act Federal Consistency
Hockessin-Polly Drummond Segment (Locations 1A & 1B) Internal Line Inspections
New Castle County, Delaware

To Whom It May Concern:

On behalf of Eastern Shore Natural Gas (Applicant), Geo-Technology Associates, Inc. (GTA) is submitting this application to install permanent above-ground piping and valves that are being added to the existing 16-inch diameter pipeline system (known as the Hockessin-Polly Drummond Segment). Ground disturbance will take place to install piping and valves, construct fence and install stone within the fenced areas. To facilitate the Application's review, GTA is submitting the following information for your review and processing:

1. Completed Coastal Zone Management Act Federal Consistency Form;
2. Site Location Map;
3. USGS Topographic Map; and,
4. *2024 ILI Location 1A_1B Sketches*, Prepared by Morris & Ritchie Associates, Inc.

The Applicant proposes this work in order to make the existing pipeline capable of conducting internal inspections as required by federal law through the Pipeline and Hazardous Materials Safety Administration (PHMSA). Ground disturbance will take place to construct the inline inspection tool launching and receiving locations. Area of launch (Location 1A) is located on a portion of New Castle County Tax Parcel 08-02900-011 located along Paper Mill Road, and receiving location (Location 1B) located on a portion of New Castle County Tax Parcel 08-054.30-172 located on the northwest corner of Polly Drummond Hill Road and Chestnut Avenue. No direct impact to wetlands or waterbodies are proposed.

3445-A Box Hill Corporate Center Drive, Abingdon, MD 21009 (410) 515-9446

◆ Abingdon, MD ◆ Baltimore, MD ◆ Laurel, MD ◆ Frederick, MD ◆ Waldorf, MD ◆ New Castle, DE ◆ Georgetown, DE
◆ Somerset, NJ ◆ NYC Metro ◆ Pittsburgh Metro ◆ Quakertown, PA ◆ Scranton/Wilkes-Barre, PA ◆ York, PA
◆ Northeastern, OH ◆ Richmond, VA ◆ Sterling, VA ◆ Nashville, TN ◆ Charlotte, NC ◆ Raleigh, NC ◆ Orlando, FL

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Delaware Department of Natural Resources and Environmental Control

Re: *Hockessin-Polly Drummond Segment (Locations 1A & 1B)*

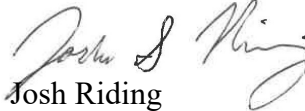
May 17, 2024

Page 2

GTA is confident that the enclosed information for the Hockessin-Poly Drummond Segment internal line inspection activities satisfies the general and regional conditions for the Coastal Zone Management Act. Should you have any questions or need additional information, please contact this office at (410) 515 9446.

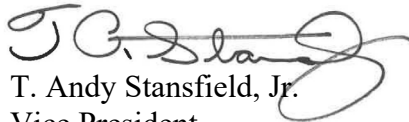
Sincerely,

GEO-TECHNOLOGY ASSOCIATES, INC.



Josh Riding

Environmental Scientist



T. Andy Stansfield, Jr.

Vice President

CEL/JSR/TAS

22755x01

L:\Shared\Project Files\2024\22755x01 - 2024 ILI Project - Location 1\WET\Reports - Permitting\Wetland Permitting\DE CZM\22257 CZM Cover Letter.doc

Completed Coastal Zone Management
Act Federal Consistency Form



Initial Review: _____
Updated On: _____
Complete: _____
Official Use Only

Coastal Zone Management Act Federal Consistency Form

This document provides the Delaware Coastal Management Program (DCMP) with a Federal Consistency Determination or Certification for activities regulated under the Coastal Zone Management Act of 1972, as amended, and NOAA's Federal Consistency Regulations, 15 C.F.R. Part 930. Federal agencies and other applicants for federal consistency are not required to use this form; it is provided to applicants to facilitate the submission of a Consistency Determination or Consistency Certification. In addition, federal agencies and applicants are only required to provide the information required by NOAA's Federal Consistency Regulations.

Project/Activity Name: _____

I. Federal Agency or Non-Federal Applicant Contact Information:

Contact Name/Title: _____

Federal Agency Contractor Name (if applicable): _____

Federal Agency: _____
(either the federal agency proposing an action or the federal agency issuing a federal license/permit or financial assistance to a non-federal applicant)

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

E-mail: _____ Telephone #: _____

II. Federal Consistency Category:

Federal Activity or Development Project
(15 C.F.R. Part 930, Subpart C)

Federal License or Permit Activity
(15 C.F.R. Part 930, Subpart D)

Outer Continental Shelf Activity
(15 C.F.R. Part 930, Subpart E)

Federal License or Permit Activity which occurs wholly in another state (interstate consistency activities identified in DCMP's Policy document)

Federal Financial Assistance
(15 C.F.R. Part 930, Subpart F)

III. Detailed Project Description (attach additional sheets if necessary):

IV. General Analysis of Coastal Effects (attach additional sheets if necessary):

V. Detailed Analysis of Consistency with DCMP Enforceable Policies (attach additional sheets if necessary):

Policy 5.1: Wetlands Management

Policy 5.2: Beach Management

Policy 5.3: Coastal Waters Management (includes wells, water supply, and stormwater management. Attach additional sheets if necessary)

Policy 5.4: Subaqueous Land and Coastal Strip Management

Policy 5.5: Public Lands Management

Policy 5.6: Natural Lands Management

Policy 5.7: Flood Hazard Areas Management

Policy 5.8: Port of Wilmington

Policy 5.9: Woodlands and Agricultural Lands Management

Policy 5.10: Historic and Cultural Areas Management

Policy 5.11: Living Resources

Policy 5.12 Mineral Resources Management

Policy 5.13: State Owned Coastal Recreation and Conservation

Policy 5.14: Public Trust Doctrine

Policy 5.15: Energy Facilities

Policy 5.16: Public Investment

Policy 5.17: Recreation and Tourism

Policy 5.18: National Defense and Aerospace Facilities

Policy 5.19: Transportation Facilities

Policy 5.20: Air Quality Management

Policy 5.21: Water Supply Management

Policy 5.22: Waste Disposal Management

Policy 5.23: Development

Policy 5.24: Pollution Prevention

Policy 5.25: Coastal Management Coordination

VI. JPP and RAS Review (Check all that apply):

Has the project been reviewed in a monthly Joint Permit Processing and/or Regulatory Advisory Service meeting?

- JPP RAS None

*If yes, provide the date of the meeting(s): _____

VII. Statement of Certification/Determination and Signature (Check one and sign below):

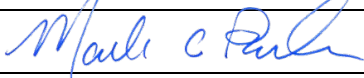
FEDERAL AGENCY CONSISTENCY DETERMINATION. Based upon the information, data, and analysis included herein, the federal agency, or its contracted agent, listed in (I) above, finds that this proposed activity is consistent to the maximum extent practicable with the enforceable policies of the Delaware Coastal Management Program.

OR

FEDERAL AGENCY NEGATIVE DETERMINATION. Based upon the information, data, and analysis included herein, the federal agency, or its contracted agent, listed in (I) above, finds that this proposed activity will not have any reasonably foreseeable effects on Delaware's coastal uses or resources (Negative Determination) and is therefore consistent with the enforceable policies of the Delaware Coastal Management Program.

OR

NON-FEDERAL APPLICANT'S CONSISTENCY CERTIFICATION. Based upon the information, data, and analysis included herein, the non-federal applicant for a federal license or permit, or state or local government agency applying for federal funding, listed in (I) above, finds that this proposed activity complies with the enforceable policies of the Delaware Coastal Management Program and will be conducted in a manner consistent with such program.

| | | | |
|---------------|---|-------|--|
| Signature: |  | | |
| Printed Name: | | Date: | |

Pursuant to 15 C.F.R. Part 930, the Delaware Coastal Management Program must provide its concurrence with or objection to this consistency determination or consistency certification in accordance with the deadlines listed below. Concurrence will be presumed if the state's response is not received within the allowable timeframe.

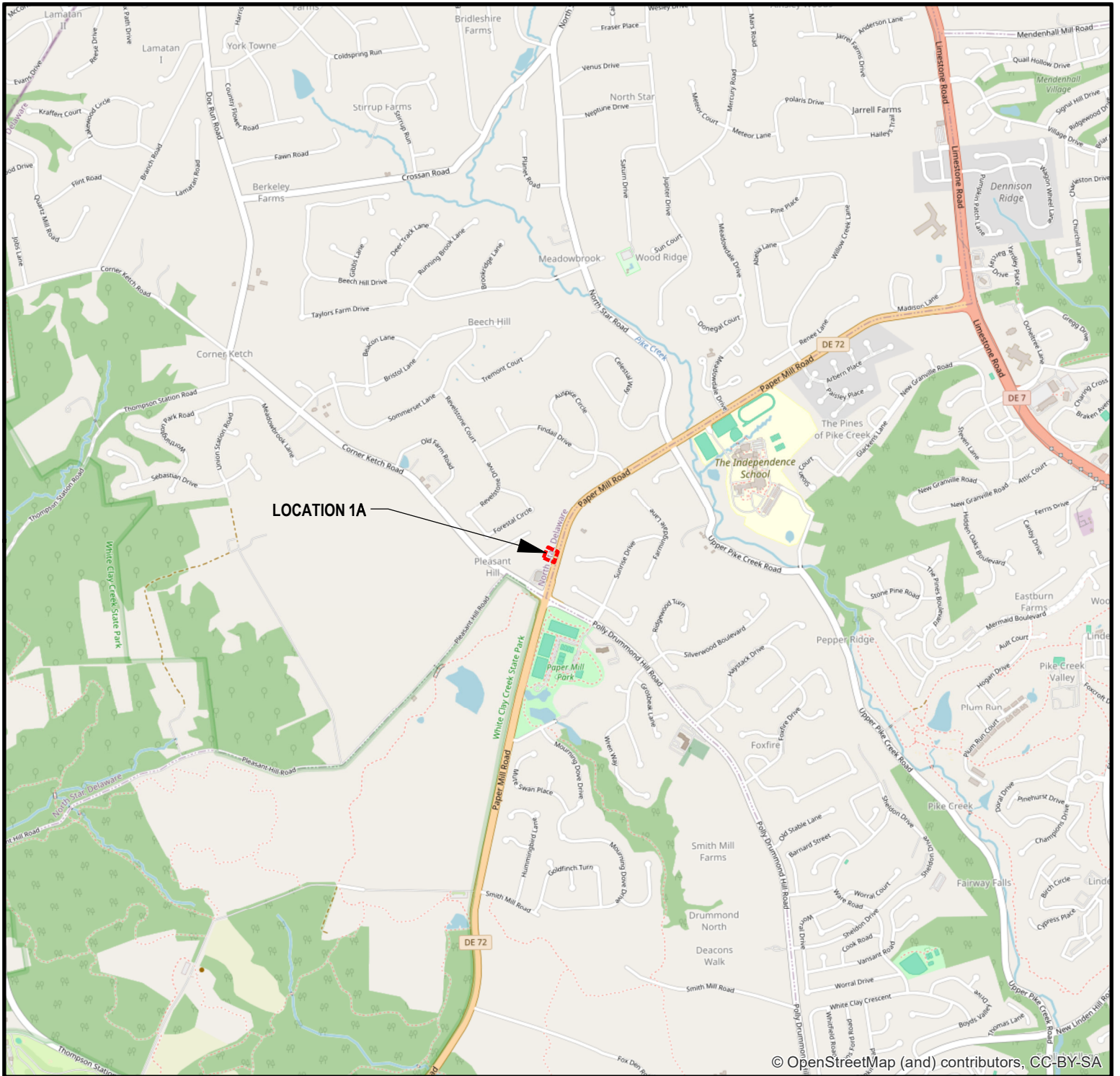
Federal Consistency Review Deadlines:

| | |
|---|---|
| Federal Activity or Development Project (15 C.F.R. Part 930, Subpart C) | 60 days with option to extend an additional 15 days or stay review (15 C.F.R. § 930.41) |
| Federal License or Permit (15 C.F.R. Part 930, Subpart D) | Six months, with a status letter at three months. The six month review period can be stayed by mutual agreement. (15 C.F.R. § 930.63) |
| Outer Continental Shelf Activity (15 C.F.R. Part 930, Subpart E) | Six months, with a status letter at three months. If three month status letter not issued, then concurrence presumed. The six month review period can be stayed by mutual agreement. (15 C.F.R. § 930.78) |
| Federal Financial Assistance to State or Local Governments (15 C.F.R. Part 930, Subpart F) | State Clearinghouse schedule |

OFFICIAL USE ONLY:

| | | |
|--|---|----------------|
| Reviewed By: | Fed Con ID: | Date Received: |
| Public notice dates: _____ to _____ | Comments Received: <input type="checkbox"/> NO <input type="checkbox"/> YES <i>[attach comments]</i> | |
| Decision type: <small>(objections or conditions attach details)</small> | Decision Date: _____ | |

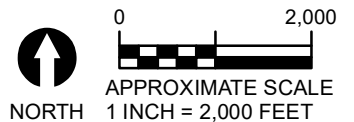
Site Location Map



© OpenStreetMap (and) contributors, CC-BY-SA

LEGEND

LOCATION 1A



GEO-TECHNOLOGY ASSOCIATES, INC.
GEOTECHNICAL AND ENVIRONMENTAL CONSULTANTS

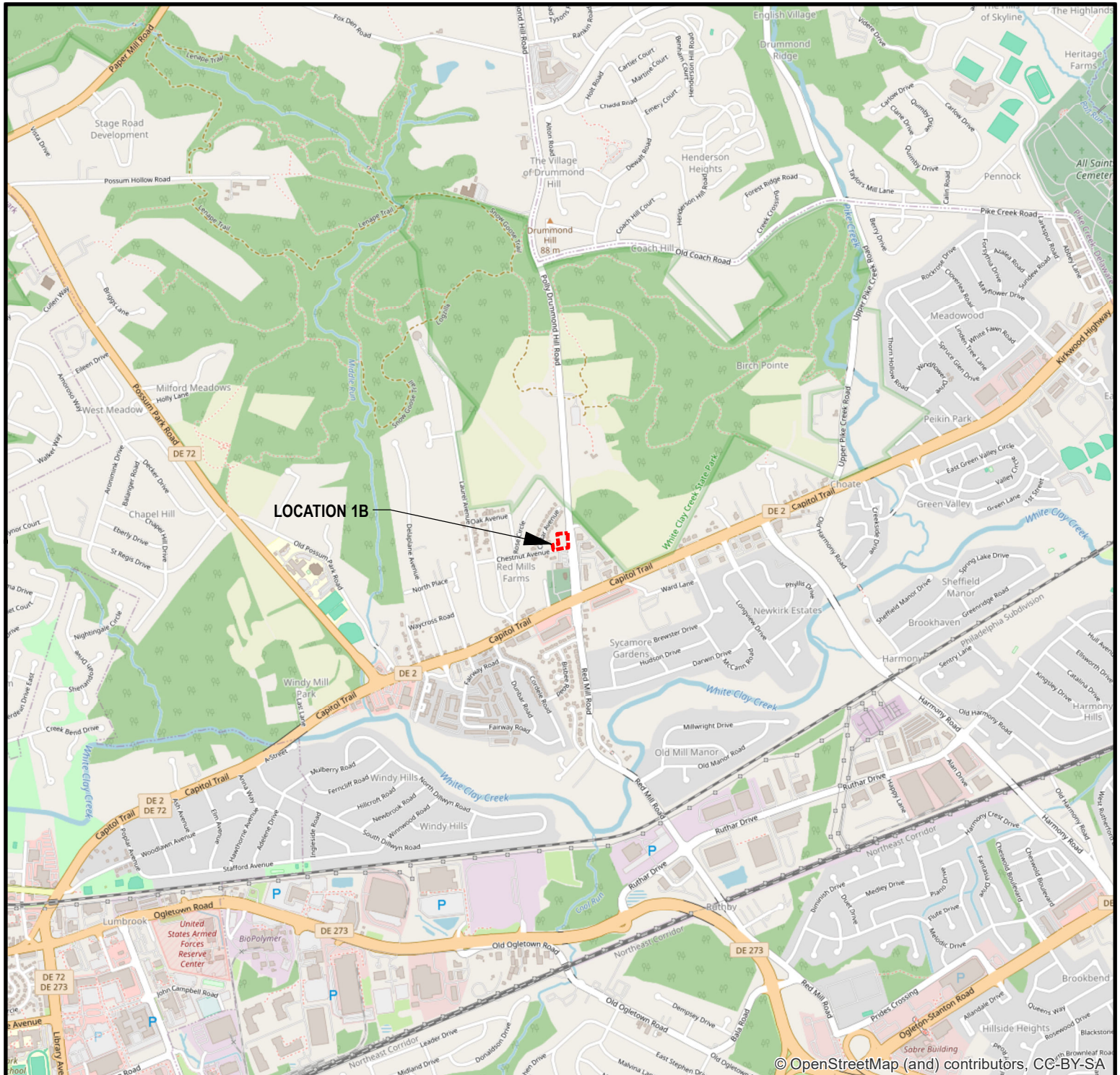
3445-A BOX HILL CORPORATE CENTER DRIVE
 ABINGDON, MARYLAND 21009
 PHONE: 410-515-9446
 FAX: 410-515-4895
 WWW.GTAENG.COM

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SITE LOCATION MAP
HOCKESSIN-POLLY DRUMMOND
SEGMENT (LOCATION 1A)

NEW CASTLE COUNTY, DELAWARE

| | | | | | | | | | | | |
|---------|-------|--------|-----------|-------|-------------|-----------|-----|------------|---------|---------|----|
| JOB NO. | XXXXX | SCALE: | 1"=2,000' | DATE: | MAY 6, 2024 | DRAWN BY: | CEL | REVIEW BY: | MAJ/TAS | FIGURE: | 1A |
|---------|-------|--------|-----------|-------|-------------|-----------|-----|------------|---------|---------|----|



LEGEND
 LOCATION 1B



GEO-TECHNOLOGY ASSOCIATES, INC.
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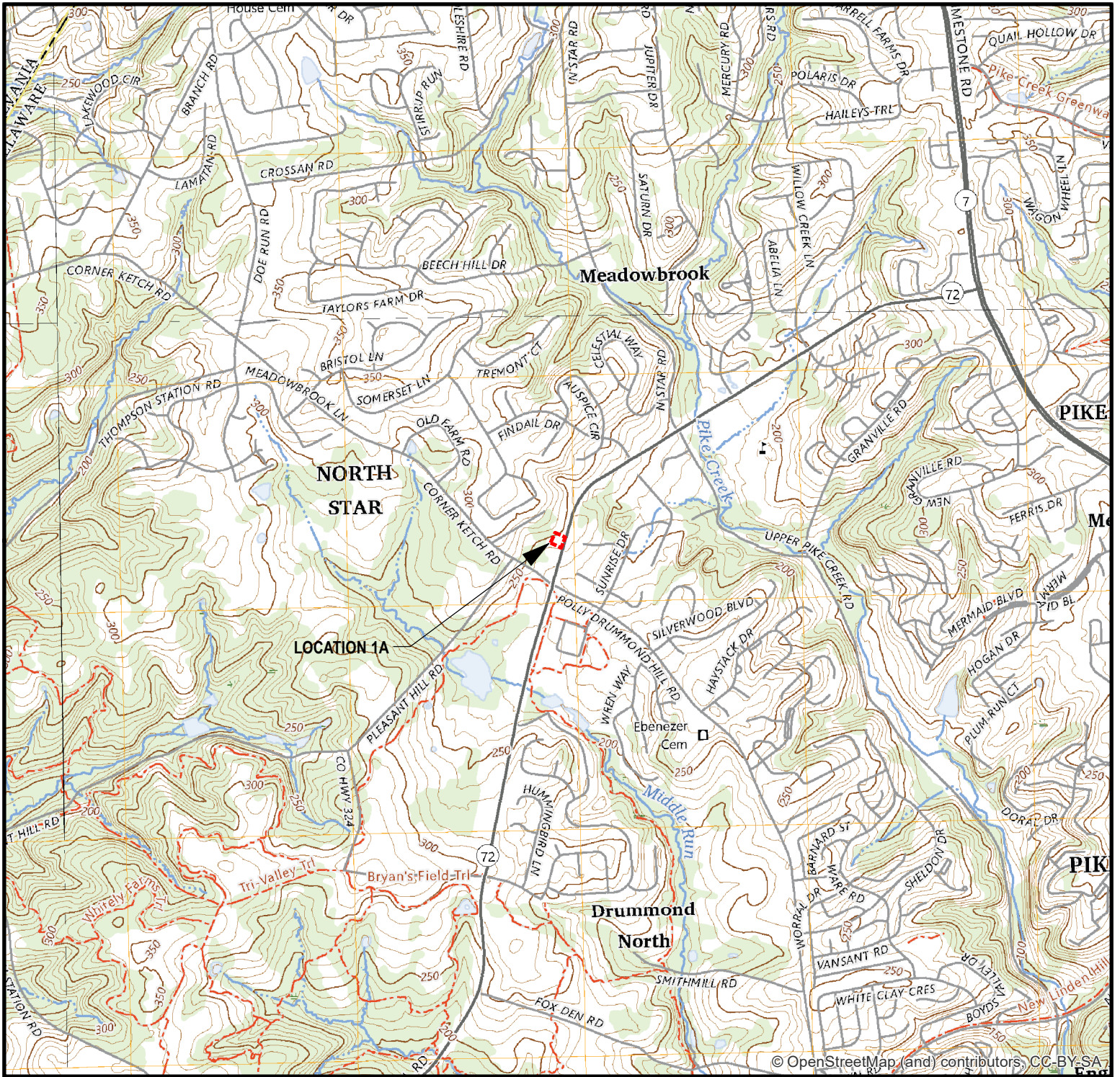
**SITE LOCATION MAP
 HOCKESSIN-POLLY DRUMMOND
 SEGMENT (LOCATION 1B)**

NEW CASTLE COUNTY, DELAWARE

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| | | | | | | | | | | | |
|---------|-------|--------|-----------|-------|-------------|-----------|-----|------------|---------|---------|----|
| JOB NO. | XXXXX | SCALE: | 1"=2,000' | DATE: | MAY 6, 2024 | DRAWN BY: | CEL | REVIEW BY: | MAJ/TAS | FIGURE: | 1B |
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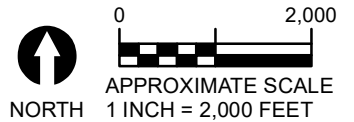
USGS Topographic Map



SOURCE: UNITED STATES GEOLOGICAL SURVEY (USGS), NEWARK EAST, DE, NEWARK WEST, DE, WEST GROVE, PA, AND KENNETT SQUARE, PA QUADRANGLES, 7.5 MINUTE TOPOGRAPHIC MAP SERIES, ALL DATED 2023.

LEGEND

 LOCATION 1A



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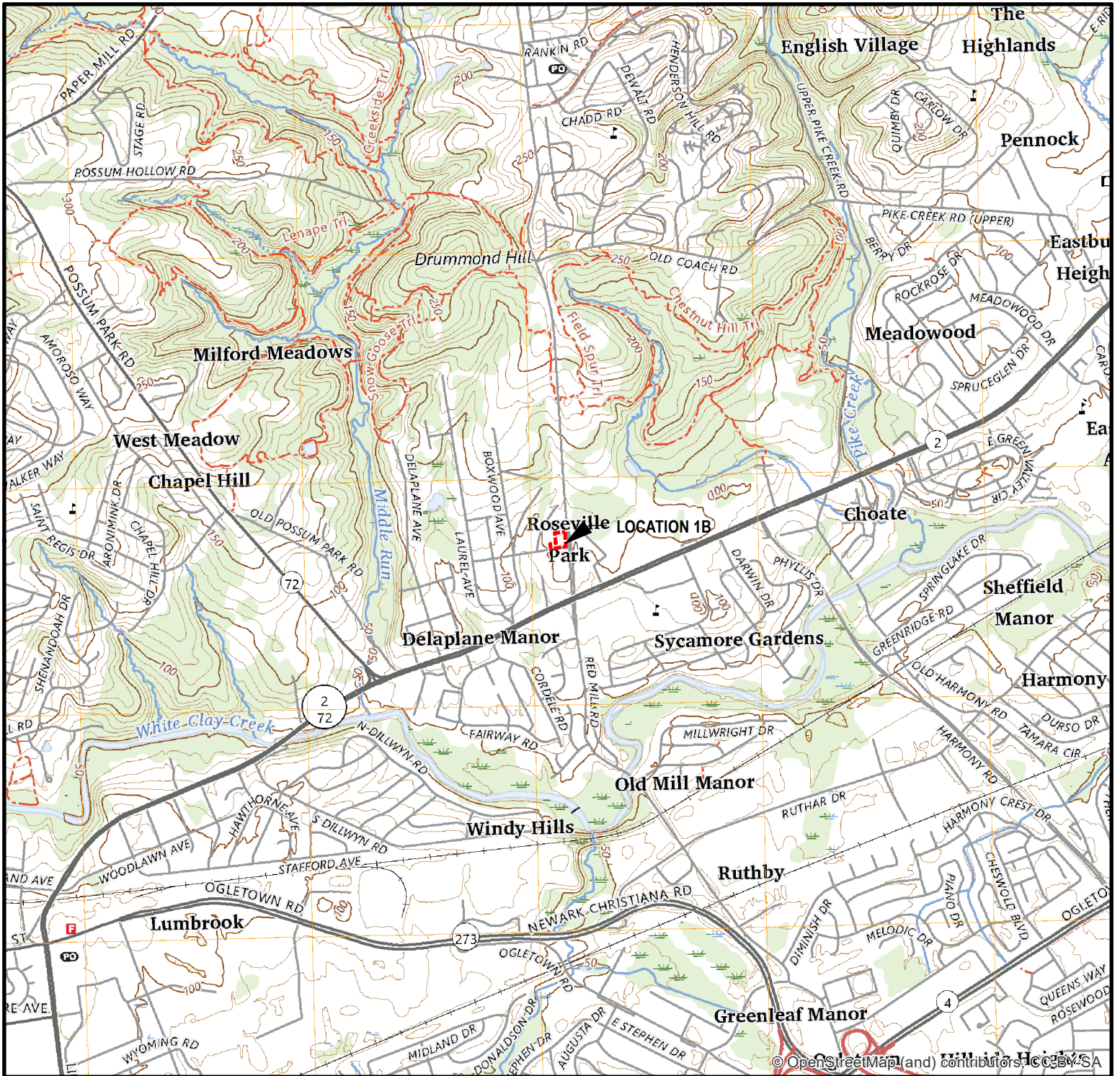
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**USGS TOPOGRAPHIC MAP
 HOCKESSIN-POLLY DRUMMOND
 SEGMENT (LOCATION 1A)**

NEW CASTLE COUNTY, DELAWARE

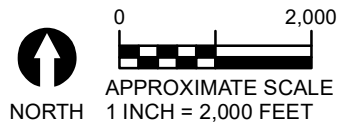
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| JOB NO. | XXXXX | SCALE: | 1"=2,000' | DATE: | MAY 6, 2024 | DRAWN BY: | CEL | REVIEW BY: | MAJ/TAS | FIGURE: | 2A |
|---------|-------|--------|-----------|-------|-------------|-----------|-----|------------|---------|---------|----|



SOURCE: UNITED STATES GEOLOGICAL SURVEY (USGS), NEWARK EAST, DE QUADRANGLE, 7.5 MINUTE TOPOGRAPHIC MAP SERIES, DATED 2023.

LEGEND

LOCATION 1B



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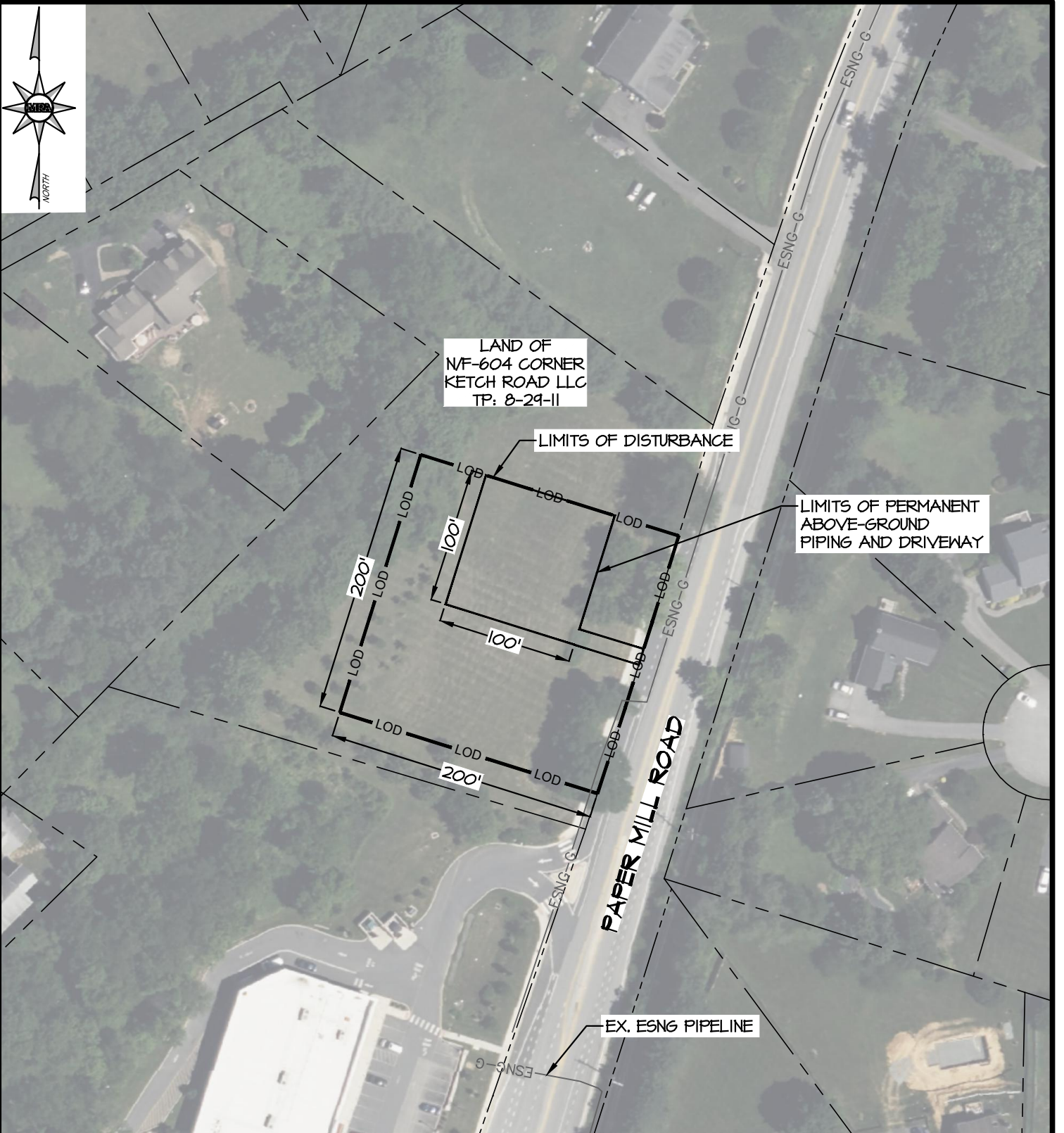
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**USGS TOPOGRAPHIC MAP
 HOCKESSIN-POLLY DRUMMOND
 SEGMENT (LOCATION 1B)**

NEW CASTLE COUNTY, DELAWARE

| | | | | | | | | | | | |
|---------|-------|--------|-----------|-------|-------------|-----------|-----|------------|---------|---------|----|
| JOB NO. | XXXXX | SCALE: | 1"=2,000' | DATE: | MAY 6, 2024 | DRAWN BY: | CEL | REVIEW BY: | MAJ/TAS | FIGURE: | 2B |
|---------|-------|--------|-----------|-------|-------------|-----------|-----|------------|---------|---------|----|

Site Sketches



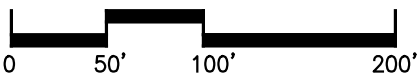
LAND OF
NF-604 CORNER
KETCH ROAD LLC
TP: 8-29-11

LIMITS OF DISTURBANCE

LIMITS OF PERMANENT
ABOVE-GROUND
PIPING AND DRIVEWAY

PAPER MILL ROAD

EX. ESNG PIPELINE



MORRIS & RITCHIE ASSOCIATES, INC.

ENGINEERS, PLANNERS, SURVEYORS, & LANDSCAPE ARCHITECTS

111 Ruthar Dr
Newark, Delaware 19711
(302) 326-2200

**EXHIBIT A
EASTERN SHORE NATURAL GAS**

ESNG 2024 ILI LOCATION 1A SKETCH

TP: 8-29-11
NEW CASTLE COUNTY, DE

SCALE: 1"=100'

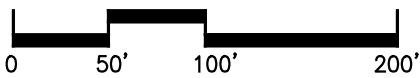
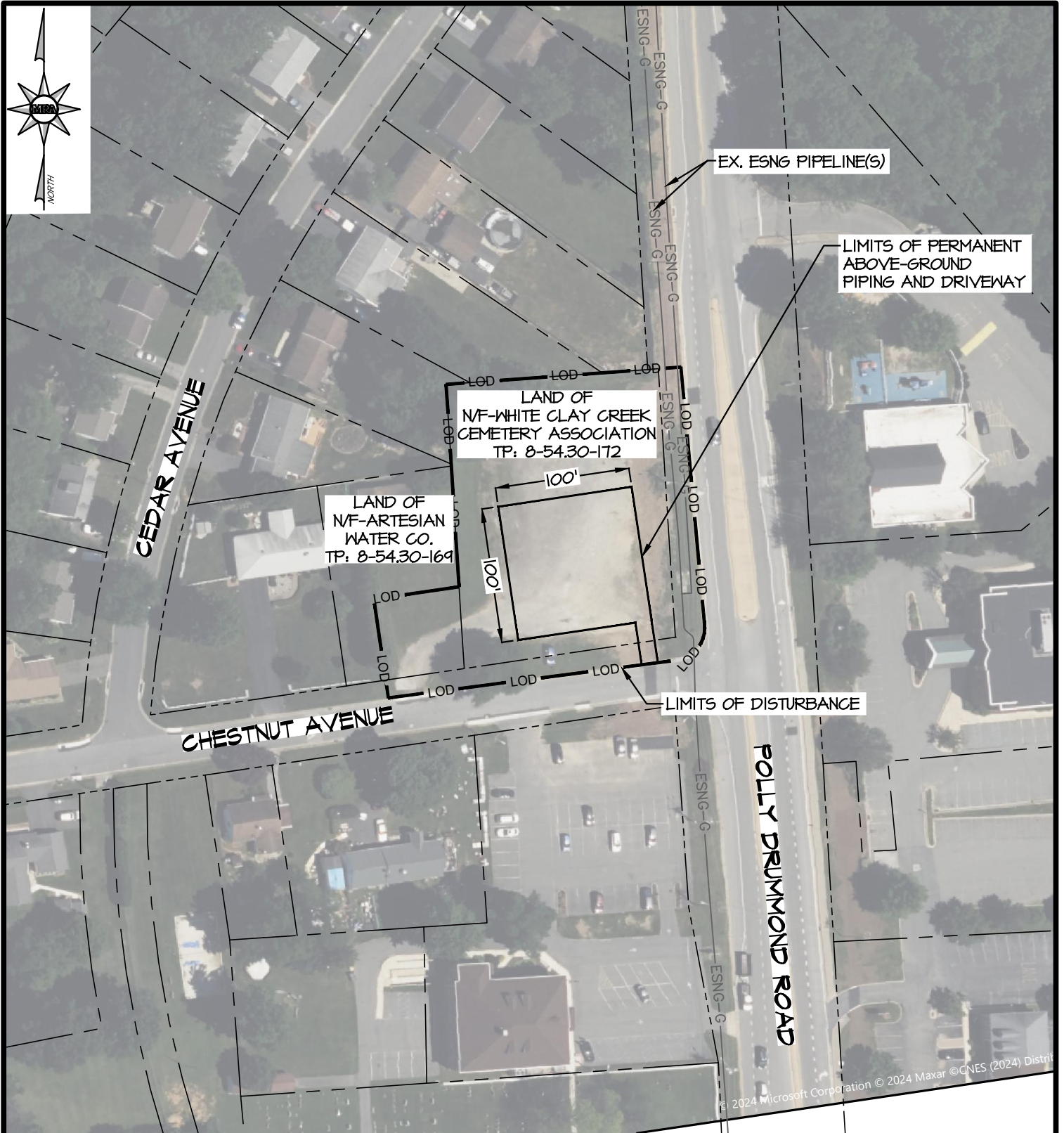
DATE: 5/10/2024

DRAWN BY: DXI

REVIEW BY: CWB

JOB NO. 22755X01

PG. 1 OF 1



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ENGINEERS, PLANNERS, SURVEYORS, & LANDSCAPE ARCHITECTS

111 Ruthar Dr
Newark, Delaware 19711
(302) 326-2200

**EXHIBIT B
EASTERN SHORE NATURAL GAS**

ESNG 2024 ILI LOCATION 1B SKETCH

TP: 8-54.30-169
& 8-54.30-172
NEW CASTLE COUNTY, DE

SCALE: 1"=100'

DATE: 5/10/2024

DRAWN BY: DXI

REVIEW BY: CWB

JOB NO. 22755X01

PG. 1 OF 1