

March 30, 2018

NOTICE OF VIOLATION

Mr. Joseph Dean
Transcontinental Gas Pipe Line Company, LLC
2800 Post Oak Blvd, Level 6
Houston, Texas 77056

CERTIFIED MAIL NO. 9171 9690 0935 0133 7706 93

Mr. Dean McDowell
Welded Construction, L.P.
26933 Eckel Road
Perrysburg, OH 43551

CERTIFIED MAIL NO. 9171 9690 0935 0133 7707 09

Re: Violations of The Clean Streams Law, and the
Dam Safety and Encroachments Act
Atlantic Sunrise Pipeline Project
DEP Permit No. ESG03000150001
DEP File No NOV 38 18 104
Union Township, Lebanon County

Dear Mr. Dean and Mr. McDowell:

On March 24, 2018, Transcontinental Gas Pipe Line Company, LLC ("Transco") called the Department of Environmental Protection ("Department") to report a 30-gallon inadvertent return of drilling fluids ("IR") from a guided bore crossing of Interstate 81 at station 2904+00 of the Atlantic Sunrise pipeline alignment. On March 26, 2018, the Department conducted an inspection of pipeline construction activities occurring in the vicinity of the reported IR in Union Township, Lebanon County ("Site"). During the inspection, the Department documented that pipeline installation activities were underway at the Site utilizing Horizontal Directional Drill ("HDD") construction methods. The Department did not authorize the use of any HDD methodology in this area. The approved method of pipeline installation at its crossing with Interstate 81 is conventional bore.

Department permit ESG03000150001 contains the following requirement:

Any construction or earth disturbance activities that are not presented on the plans submitted in support of the application are not authorized by the permit. A request to modify the permit must be submitted by the permittee and approved by DEP before the permittee may commence any construction or earth disturbance activities that are not included in the information submitted in support of the application.

The Department did not authorize the use of any HDD methodology at the Site.

Mr. Joseph Dean
Mr. Dean McDowell

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Failing to comply with permit conditions, and failing to perform work according to permit specifications constitutes unlawful conduct under Section 611 of the Clean Streams Law, 35 P.S. § 691.611.

In order to develop an appropriate enforcement strategy, the Department requests that you submit the following to the attention of Ronald Eberts by email at reberts@pa.gov by **April 6, 2018**.

- Daily construction logs, including drill logs, covering the time from the commencement of HDD activities through present day. The logs should document the following for each day of activity: start and stop times of drill, stage of HDD process, approximate progress along the drill alignment, drill pressure, depth of cover, and any loss of pressure and/or drilling fluids, including volumes or percentages of diminished returns.
- A proposed plan of action, including schedule, for completing pipeline construction at the Site. The plan should clearly indicate whether a permit amendment request for ESG03000150001 will be sought for the altered construction methodology or if the current HDD activities will be properly abandoned to returned to the construction methodology already approved in ESG03000150001.
- Copies of the certified mail receipts and landowner responses for notifications made to landowners within 450 feet of the HDD alignment that HDD operations would be commencing and offering to have water supplies within 450 feet of the HDD alignment sampled before, during, and after start of the HDD operations in accordance with the Transco Well and Spring Monitoring Plan.
- A report documenting any other unpermitted changes made to the method for installation of the Atlantic Sunrise pipeline. Permitted methods of pipeline construction are limited to open trench/open cut, and two trenchless installation methods, conventional bore and HDD. Such changes include, but are not limited to, a change from conventional bore to HDD (including, but not limited to, "guided bore"), a change from open cut to conventional bore or HDD (including, but not limited to, "guided bore"), and a change from HDD (including, but not limited to, "guided bore") or conventional bore to an open cut. The report shall document all steps taken by Transco to determine if unpermitted changes have occurred. The information regarding the altered crossing methodology shall be provided on the forms attached hereto as Exhibit 1.

Please be reminded that Department approval is required before restarting any HDD operations or any other methodology at this location other than conventional bore.

Mr. Joseph Dean
Mr. Dean McDowell

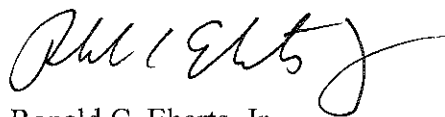
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This Notice of Violation is neither an order nor any other final action of the Department. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

The Department looks forward to your cooperation in this matter. If you have any questions, please contact me at 717.705.4819.

Sincerely,



Ronald C. Eberts, Jr.
Environmental Protection Compliance Specialist
Conservation, Restoration, and Inspection Section
Waterways & Wetlands Program

encl.

cc: Lynda Schubring, Transcontinental Gas Pipe Line Company, LLC
Karl Kerchner- Lebanon County Conservation District
Captain Alan Robinson - PA Fish and Boat Commission, Southcentral Region
Union Township