

1.0 INTRODUCTION

On behalf of Seneca Resources Company, LLC (Seneca), RETTEW Associates, Inc. prepared this into-basin diversion renewal application for SRBC Docket Nos. 20141216 and 20141216.2. This renewal is for the diversion of fresh water from nine existing and permitted groundwater sources located outside of the Susquehanna River Basin (herein referred to as the “basin”) in McKean County, Pennsylvania. Renewed approval from two previously approved sources (groundwater wells SRC No. 6H and Clermont No. 3) is not being requested, and water from these two sources will no longer be diverted into the basin.

The water will enter the basin in the same previously approved Impoundment 1 located in Norwich Township, McKean County, Pennsylvania. Distribution and metering will be similar to prior approvals. The water will be used in Seneca’s natural gas well development areas located within the basin in portions of McKean, Elk, and Cameron Counties, Pennsylvania. Seneca’s development area in this region straddles the boundary between the Susquehanna River Basin and the Ohio River Basin. A Project Information Form No. 72 is provided as **Appendix I**, and an application fee worksheet is provided as **Appendix II**.

2.0 PROJECT DESCRIPTION

An overall project layout map is provided as **Figure 1**, which shows the nine water sources and Impoundment 1 where the diverted water will be first stored and distributed from for use at multiple existing and proposed natural gas well pads. Water will be withdrawn from the sources located outside of the basin, and then it will be diverted into the basin for consumptive use to develop natural gas wells at pads located within the basin. Once the water is diverted into the basin, it will remain in the basin and will only be used at in-basin gas wells. None of the water will be diverted back out of the basin.

The nine out-of-basin sources, which are all located in Sergeant Township, McKean County, Pennsylvania, are listed in **Table 1** below. Ownership and/or agreement documentation for the nine sources is provided in **Appendix III** (note: appendix is subdivided by source).

Table 1 – Source Location Information			
Water Sources (Groundwater Wells)	Coordinates (NAD 83)		Watershed Boundary Dataset (WBC)
	Latitude	Longitude	
SRC No. 5H	41.679167	-78.502861	0501000501 (East Branch Clarion River)
Clermont No. 1	41.616739	-78.442368	0501000101 (Potato Creek)
Clermont No. 2	41.611389	-78.447444	0501000101 (Potato Creek)
Clermont No. 4	41.681392	-78.497136	0501000501 (East Branch Clarion River)
Clermont North Well No. 1	41.704258	-78.499881	0501000101 (Potato Creek)
Clermont North Well No. 2	41.704422	-78.498422	0501000101 (Potato Creek)
Clermont North Well No. 3	41.704281	-78.496422	0501000101 (Potato Creek)
Clermont South Well No. 7	41.666100	-78.486128	0501000101 (Potato Creek)
Clermont South Well No. 10	41.660917	-78.503397	0501000501 (East Branch Clarion River)

An updated Into-Basin Diversion Metering Plan is provided as **Appendix IV**. The diverted water will be consumptively used in the basin to develop natural gas wells planned for areas comprised by portions of Norwich and Liberty Townships, McKean County, Shippen Township and Emporium Borough, Cameron County, and Benezette Township, Jay Township, City of St. Marys, and Jones Township, Elk County. All water diverted into the basin will be used solely for the development of gas wells (downhole use) and will not be used for other purposes such as dust suppression or irrigation. Water used at well pads within the basin will be tracked and reported through SRBC’s Approval By Rule process, as required.

3.0 REQUESTED INTO BASIN DIVERSION RATE

Seneca requests a total peak day into-basin diversion rate of 2.517 million gallons per day (mgd). This limit is a sum of the individual source limits approved by Pennsylvania Department of Environmental Protection (PA DEP), as summarized in **Table 2** below.

Table 2 – Water Sources and Limits	
Groundwater Well	Maximum Daily Withdrawal Limit (mgd)
SRC No. 5H	0.288
Clermont No. 1	0.249
Clermont No. 2	0.216
Clermont No. 4	0.432
Clermont North Well No. 1	0.216
Clermont North Well No. 2	0.288
Clermont North Well No. 3	0.216
Clermont South Well No. 7	0.252
Clermont South Well No. 10	0.360
Total:	2.517
mgd – million gallons per day	

This request for renewal is supported by Seneca’s water needs in the area. Over the next five years, Seneca plans to use water via this into-basin diversion to develop at least four well pads, with approximately five wells per pad. An estimated 10,000,000 gallons of fluid are needed to develop each well.

4.0 WATER QUALITY DATA

The diverted water will not be discharged to waters within the Susquehanna River Basin, and all water will be consumptively used for natural gas well development (i.e., used downhole). Seneca coordinated the collection of water quality samples from the nine sources as part of original diversion application. Laboratory analytical reports are provided in **Appendix V**.

5.0 OTHER AGENCY PERMIT INFORMATION

The nine existing sources are approved by PA DEP. A copy of the most recent Water Management Plan approval letter and source list is provided in **Appendix VI**. Renewals were submitted to PA DEP for the two wells (Clermont No. 4 and Clermont No. 1) that show expired dates in the source list, and the renewals are

under review with PA DEP. Withdrawn water from the sources is metered and reported through the Pennsylvania Act 220 program, and reported utilizing PA DEP’s GreenPort system, as required.

6.0 CONSTRUCTION SCHEDULE

Construction of the water sources, distribution system, metering, and storage systems are complete.

7.0 NOTICES

Notices will be submitted following receipt of an SRBC pending number. Notice letters will be submitted to the following agencies in **Table 3** below; an example notice letter for SRBC review is provided as **Appendix VII**. A newspaper notice will be published in The Bradford Era newspaper.

Table 3 – Notification List	
Agency	Addressee
Pennsylvania DEP	Richard Neville Environmental Program Manager Oil & Gas Northwest Region 230 Chestnut Street Meadville, PA 16335
Sergeant Township	14225 Wilcox Rd Mount Jewett, PA 16740
Norwich Township	3853 West Valley Rd Smethport, PA 16749
McKean County Commissioners	17137 Route 6 Smethport, PA 16749
McKean County Planning Commission	17137 Route 6 Smethport, PA 16749
Newspaper notice to be published in The Bradford Era	NA

8.0 CONCLUSION

Seneca requests renewal of its into-basin diversion approval (renewal of SRBC Docket Nos. 20141216 and 20141216.2) for the nine groundwater well sources and a total peak day diversion rate limit of 2.517 mgd. Following receipt of an SRBC pending number, notices will be sent and published, and notice documentation will be submitted to SRBC upon receipt.