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851 Chemung Street  
Horseheads, New York 14845

October 6, 2021

Mr. Ken Ripley, Code Enforcement Officer  
Village of Veteran  
P.O. Box 183  
4049 Watkins Road  
Millport, New York 14864

**Re: Review of Stormwater Pollution Prevention Plan (SWPPP)  
Reclamation Plans for Repsol Oil & Gas USA, LLC  
Lower Middle Road, Town of Veteran, Chemung County, New York**

Mr. Ripley:

I have completed a review of the following submitted information for the above-referenced project regarding the proposed stormwater management system for that project.

- Stormwater Pollution Prevention Plan (SWPPP) for Lant 1 Well Site Reclamation, Stamped by a NYS Licensed Professional Engineer, Prepared by Larson Design Group, Dated September 2021, Received on September 15, 2021
- Reclamation Plans for Repsol Oil & Gas USA, LLC – Lant 1 Well Site, Stamped by a NYS Licensed Professional Engineer, Prepared by Larson Design Group, Dated September 10, 2021, Received on September 15, 2021

My review comments and questions regarding the SWPPP for the above-referenced project, based upon the submitted information, are as follows.

**MISCELLANEOUS ITEMS**

1. It is requested that the SWPPP provide a description of the uniqueness and importance of the downstream portion of Sleepers Creek (known locally as Sleepers Run) and acknowledge that the project site is within the upstream watershed of this stream. The discharge of sediment and other pollutants from the project site would have an adverse impact on this stream.

Sleepers Creek (known locally as Sleepers Run) is a tributary of Catharine Creek and is classified as C(TS) for trout spawning. This tributary has the greatest density of juvenile Rainbow Trout of any stream within the Catharine Creek system (including Catharine Creek itself) and is considered by the NYSDEC to be the premiere nursery creek within that system. When compared to Catharine Creek, Sleepers Run has a consistently cooler water, which better supports young trout.

2. What is the background on the “Existing Stormwater Features” on Sheets C-1 and C-2? Are these permanent stormwater management facilities that were constructed to address the hydrologic impacts of the impervious (compacted gravel) area of the original site construction? What drainage area is tributary to these stormwater features? Given that some impervious area (compacted gravel) is proposed to remain, would these stormwater features be required to stay in place, be replaced, or be modified?

3. It is requested that the Town of Veteran (including members of the Chemung County Stormwater Team) be noted specifically in Sections 2.5 and 3.4 of the SWPPP as having the right to enter and inspect the project site.
4. When will Part 1 of the Short Environmental Assessment Form be completed?
5. The project site is within an Archaeological Sensitive Area, as per NYS Cultural Resource Information System (CRIS). As such, it is requested that documentation be provided that indicates that the project has been determined not to have an adverse effect on archaeological and historic resources by the New York State Office of Parks, Recreation and Historic Preservation's Division for Historic Preservation.

#### **EROSION & SEDIMENT CONTROL**

1. In regards to the proposed Stabilized Construction Entrance, the following items are noted.
  - As per the Stabilized Construction Entrance Detail on Sheet DET-4, a minimum width of 24 feet is required for a stabilized construction entrance for a single entrance. The proposed stabilized construction entrance is shown on Sheet C-2 with a width of only 14 feet (approx.). For clarity, it is requested that the width of the proposed stabilized construction entrance shown on Sheet C-2 be increased accordingly.
  - If sediment is found being tracked from the project site onto Lower Middle Road, a second stabilized construction entrance should be constructed on the drive at the entrance on Lower Middle Road at that time.
2. Where is the proposed staging area for the site reclamation operations? Are additional erosion and sedimentation controls needed for that area?
3. Given that a sizeable drainage area exists uphill of the limits of disturbance of the project site, consideration should be given to the temporary diversion of the runoff from this area to better protect the disturbed area.
4. In regards to the Compost Filter Sock detail on Sheet DET-5, it is requested that the CS-18, CS-24, and CS-32 designations be defined/clarified.
5. Although not proposed, the use of silt fence is noted in the Erosion and Sediment Control Notes on Sheet DET-1.
5. In Section 2.1.1 of the SWPPP, the word mesh is mis-spelled.
6. All of the proposed compost filter socks indicated on Sheet C-2 are not shown on Sheet C-3.
7. It is requested that the Dust Control Standard and Specification from the New York State Standards and Specifications for Erosion and Sediment Control be referenced and included in the SWPPP.

#### **GENERAL**

1. This review pertains only to stormwater management and erosion/sediment control. The Applicant is responsible to obtaining all other necessary approvals, including those from the New York State Department of Environmental Conservation.
2. Documentation of the NYSDEC's acceptance of the plans to reclaim the well site and decommission the existing well is requested for the Town's records.

3. It is requested that the Applicant contact the Town of Veteran Highway Superintendent regarding bonding requirements for Town roadways that may be adversely impacted by the vehicular traffic/loadings to/from the project site.

If you have any questions or comments regarding this letter, please do not hesitate to contact me. Furthermore, I would be happy to meet to discuss this project in greater detail.

Sincerely,



Jimmie Joe Carl, P.E.

Cc: Bill Winkky, Town of Veteran  
Curt Rhodes, Town of Veteran  
Shawn LaPierre, Town of Veteran  
Mark Watts, Chemung County Soil & Water Conservation District