

LETTER OF NOTIFICATION

For

Delta, OH Capacity Improvement Project

Fulton County

Ohio Power Siting Board

Case No. 25-0755-GA-BLN

Submitted By:

Ohio Gas Company

August 2025

**BEFORE THE OHIO POWER SITING BOARD
LETTER OF NOTIFICATION**

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GLOSSARY

<i>MAOP</i> : Maximum Allowable Operating Pressure	5
<i>ODNR</i> : Ohio Department of Natural Resources	8
<i>OEPA</i> : Ohio Environmental Agency	7
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psig : Pounds per Square Inch Gauge	5
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4906-6-05 Letter of Notification Requirements

4906-6-05 GENERAL INFORMATION

4906-6-05(B)(1)(a): Name and Reference Number

Ohio Gas Company (Ohio Gas) is applying for a Letter of Notification for a natural gas pipeline project located in Fulton County, Ohio. The name of the project is Delta, OH Capacity Improvement Project (Project).

4906-6-05(B)(1)(b): Brief Description of Project

Ohio Gas is planning an extension of approximately 4 miles of 12-inch, high pressure distribution main, operating at 375 psi. The Project is located along US 20A between County Road (CR) 13 and east of State Route (SR) 109. The Project will consist of two (2) phases: Phase I-Delta West, will consist of new pipe; Phase II-Delta East, will consist of replacing existing 6-inch pipe which will be abandoned in place. The Project is located in a rural, agricultural area with industrial development on the eastern half. A project location map is included as **Appendix A**.

The pipeline will be installed by open cut methods with horizontal directional drilling (HDD) utilized in select areas. The pipeline corridor will have a temporary construction easement ranging from 50-75 feet. The permanent easement will be 25 feet.

An environmental study was completed within a 100-foot-wide area centered upon the proposed alignment to determine the potential impacts to wetlands, streams, and vegetated communities.

4906-6-05(B)(1)(c): Why the Project Meets the Requirements for LON

The proposed pipeline extension project falls under the jurisdiction of the Ohio Power Siting Board as a Letter of Notification (“LON”); it meets the criteria listed in Appendix B [1(b)] of the Ohio Administrative Code Rule 4906-1-01 because it is an extension of a gas pipeline or pipeline segment greater than one mile in length but not greater than five miles in length. The pipeline will be wholly owned and operated by Ohio Gas, and the primary purpose of the Project is to upgrade the capacity for natural gas in Delta to serve the current growth of demand.

4906-6-05(B)(2): Statement of Need for the Proposed Facility

The Project is needed to upgrade the capacity of the existing 6-inch natural gas pipeline in order to serve the current and future growth and demand of both residential and industrial users.

4906-6-05(B)(3): Location of the Project

This is a linear pipeline project divided into two separate phases: Phase I-Delta West and Phase II-Delta East. There is not a single street address for this project. The project is situated between the Village of Delta and the City of Wauseon in York Township, Fulton County.

Below are the coordinates for the central portion of each section listed above:

Phase I N 41° 34' 23.67" / W 84° 05' 48.76"

Phase II N 41° 34' 24.31" / W 84° 03' 21.68"

In addition, a project location map is included as **Appendix A**.

4906-6-05(B)(4): Alternatives Considered

No alternatives have been proposed as this project is an extension of an existing utility. The majority of the Project will be located along public road right of ways. As discussed above, the Project is being completed to meet the current and future demand for natural gas.

4906-6-05(B)(5): Description of Public Information Program

Ohio Gas previously sent letters to each affected property owner, notifying them of the Project, and has attempted to personally contact each property owner to set up a meeting to discuss the project parameters. A list of all property owners is included as **Attachment B**. Furthermore, copies of the following model letters are included as listed below in **Attachment C**:

- Model letter sent to landowners and tenants within seven (7) days of the filing of this application
- at least seven (7) days prior to work on the affected property as required by 4906-6-11(C)

4906-6-05(B)(6): Anticipated construction schedule, in-service date

Construction activities are expected to commence on the Project in early September 2025. Ohio Gas intends to place the pipeline back in to service in December 2026.

4906-6-05(B)(7): Project Area Map and Directions

A map of the project is included as **Attachment D**. This map contains an overview of the project at a scale of 1:24,000 and depicts the centerline of the pipeline, roads, homes, agricultural fields, and industrial developments.

4906-6-05(B)(8): Property Owner List

The Project is located within existing easements as well as new easements that will be negotiated by Ohio Gas. There are 36 parcels associated with this Project. Two (2) of the parcels are owned by a government entity, 25 parcels are residential/agricultural, and nine (9) parcels are owned by commercial entities. As mentioned above, a property owner list is included as **Attachment B**.

4906-6-05(B)(9)(a): Operating Characteristics, Required Structures, and Right-of-Way and/or Land Requirements

- ***Pipeline MAOP:*** The maximum allowable operating pressure will be 500 psi.
- ***Pipe Material:*** The proposed pipeline will be 12-inch nominal diameter, fusion bonded-epoxy coated (FBE), API-5L Grade X52 (52220 psi yield strength) steel pipe with some having 0.500-inch, or 0.375-inch wall thicknesses; depending on site location.
- ***Structures:*** No structures will be constructed as part of the extension project.
- ***Right-of-Way (ROW) and/or Land Requirement:*** The proposed project will require additional new easements for the two phases. Ohio Gas is currently working with landowners to finalize easement agreements.

Typically, when Ohio Gas extends a pipeline segment, the pipe is abandoned and removed. The majority of the existing pipe for this project will be abandoned in-place.

4906-6-05(B)(9)(b): Electric and Magnetic Fields

Since this is a natural gas pipeline this section does not apply.

4906-6-05(B) (9)(c): Estimated Capital Costs

The estimated capital cost of the Project is approximately \$4.8 million.

4906-6-05(B)(10)(a): Land Use

The Project is located in York Township in Fulton County. Land use associated with these areas consists of residential, industrial, and agricultural developments.

Population density per square mile for the pipeline location has been provided in Table 1 below.

TABLE 1: POPULATION ESTIMATE, 2020 U.S. CENSUS DATA

Location	Population Density per Square Mile
Fulton County	105
York Township	100
Village of Delta	1,051
City of Wauseon	1,870

4906-6-05(B)(10)(b): Agricultural Land

The Project area intersects eleven (11) parcels that have enrolled in an agricultural district. The farmland within the Project area is comprised of *prime farmland if drained* and *farmland of local importance*. During construction, topsoil will be stripped and stockpiled within the temporary construction easement. Once the pipeline is installed and the trench back filled, the topsoil will be spread and graded to pre-construction contours.

4906-6-05(B)(10)(c): Archeological and Cultural Resources

Utility Technologies International (UTI) contracted CTL Engineering to conduct a Cultural Resources Literature Review for the Project. A summary of their findings and conclusions is presented below.

The literature review found that there was a total of fifteen (15) previously recorded archaeological sites within the study radius. Ten (10) OHI properties were discovered, and

five (5) of which have since been demolished. Additionally, two (2) one room schoolhouses were also identified along the Project area.

The Project area is restricted to the edge of right-of-way, therefore most of the archaeological sites associated with these houses/buildings will not be affected. Furthermore, since the Project consists of the underground installation of a pipeline, the indirect visual effects to adjacent houses will be temporary during the period of construction.

Based on a review of SHPO's records, a sizable portion of the western half of the Project has previously been surveyed. There were no significant cultural resources identified within the project area by any of these prior surveys. Portions of the eastern half of the project have not been surveyed, however, much of this portion of the Project area is developed for residential or industrial uses.

On May 28, 2025, Ms. Catherine Gullett with OHPO, responded to the Section 106 request and the Literature Review. Ms. Gullett recommended a Phase I archaeological survey be conducted on any portions of the Project area not previously surveyed. The western portion of the Project has been surveyed and much of the eastern portion of the Project area is developed with residential and industrial uses. Additionally, the majority of the pipeline construction corridor is within existing utility right of way and/or along public road right of way. As such, Ohio Gas believes a Phase I archaeological survey is not needed. OHPO correspondence, including the Cultural Resources Literature Review, is included as **Attachment F**.

4906-6-05(B)(10)(d): List of Governmental Agencies Which Have Requirements to be met by the Project

Local, state and Federal agencies with requirements anticipated for the Project are outlined in Table 2, along with references to applicable documentation provided as attachments to this LON.

Ohio Gas will temporarily impact less than 0.1 acre of perennial streams. A Non-Reporting Nationwide Permit 12 will be prepared for stream impacts. A Non-Reporting NWP does not require approval by the USACE (*USACE*) as long as specific permit conditions are met. Ohio Gas requests that coverage under this permit be recognized during the preparation of the Staff Report.

Ohio Gas also anticipates submitting a NOI to the OEPA (*OEPA*) for a General Permit for Stormwater Associated with Construction Activity (OEPA permit number OHCG00006) and General Permit Authorization to Discharge Hydrostatic Test Water (OEPA permit number OHH000004). Ohio Gas will provide a copy of the permits to Staff upon receipt. Ohio Gas requests that the OEPA approval for coverage under these permits be made a condition set forth in the Staff Report.

***TABLE 2: LOCAL, STATE AND FEDERAL AGENCIES
WITH REQUIREMENTS TO BE MET BY THE PROJECT***

Name of Agency	Document to be Submitted	Attachment
Ohio Department of Transportation	- Road Crossing Permit	N/A
Fulton County Engineer/Board of Commissioners	- Permit to Occupy County/Township Road Right of Way	N/A
Ohio Historic Preservation Office	- Coordination Request - Cultural Resources Literature Review	F

Name of Agency	Document to be Submitted	Attachment
US Fish and Wildlife Service	- Coordination Request	G
Ohio Department of Natural Resources	- Natural Heritage Data Request	H
U.S. Army Corps of Engineers	- Non-Reporting Nationwide Permit 12	N/A
Ohio Environmental Protection Agency	- NOI – General Permit Authorization For Stormwater Discharges Associated With Construction Activity (OHC000006)	N/A
Ohio Environmental Protection Agency	- NOI – General Permit Authorization to Discharge Hydrostatic Test Water (OHH000004)	N/A

4906-6-05(B)(10)(e): Federal and State Designated Species

A request for threatened and endangered species coordination was processed on the U.S Fish and Wildlife Service (**USFWS**) IPaC service web-based system on June 16, 2025. The system generated a threatened and endangered species list and critical habitats in the Project area. There were no critical habitats within the Project area under their jurisdiction. The coordination letter and response has been provided as **Attachment G**.

An Environmental Review Request was made to the Ohio Department of Natural Resources (**ODNR**) on June 16, 2025. A response was received on July 16, 2025. In summary, the agency recommended seasonal tree clearing to protect listed bat species habitat, and seasonal in-water work for perennial streams to reduce impacts to indigenous aquatic species and their habitats. A copy of this response is provided as **Attachment H**.

4906-6-05(B)(10)(f): Areas of Ecological Concern

UTI completed an environmental survey along the proposed Project area in March 2025. These survey included a wetland delineation and threatened and endangered species survey. The focus of the endangered species survey was to identify potential Indiana and Northern Long-Eared Bat habitat. The *Environmental Survey Map* has been provided as **Attachment I**.

In summary, three (3) perennial streams were identified within the Project area. A summary of the resources is presented in Table 3 below.

TABLE 3: DELINEATED STREAMS

ID	Project Phase	Approximate Station Location	Classification	Receiving Water Body
Stream 1	Phase I	42+00	Perennial	North Turkeyfoot Creek
Stream 2	Phase I	93+00	Perennial	North Turkeyfoot Creek
Stream 3	Phase I	108+00	Perennial	North Turkeyfoot Creek

The federally and state listed endangered Indiana Bat Northern Long-Eared Bat is found in wooded areas under loose tree bark on dead or dying trees during the summer months. During the winter months the bats hibernate during winter in caves and occasionally abandoned mines. These bats also forage in or along edges of forested areas. As part of the survey, potential roost trees (PRTs) were evaluated. No PRTs were identified within the Project area.

In an effort to control indirect impacts to surface waters, Ohio Gas will prepare a storm water pollution prevention plan (SWPPP) in conjunction with the construction plans. The SWPPP follows the recommendations and guidelines established by the OEPA and the

ODNR *Rainwater and Land Development Manual*. A copy of selected construction plans is included as **Attachment E**. Ohio Gas will also submit for coverage under the OEPA's *General Permit Authorization for Stormwater Discharges Associated with Construction Activity* (OHC000006). This permit can be submitted for Staff review if requested.

4906-6-05(B)(10)(g): Any Known Unusual Conditions Resulting in Significant Environmental, Social, Health, or Safety Impacts

There is no known information of any unusual conditions associated with the Project.

4906-6-07 SERVICE AND PUBLIC DISTRIBUTION OF ACCELERATED CERTIFICATE APPLICATIONS

4906-6-07(a)(1): Service of Accelerated Application Upon Officials

Simultaneously with the filing of this accelerated application with the Board, Ohio Gas has caused a transmittal letter and copy of the application to be delivered to the following public officials:

TABLE 4: FULTON COUNTY, DELTA & WAUSEON PUBLIC OFFICIALS LIST

Mayor Allen Naiber Village of Delta 401 Main Street Delta, OH 43515	Mayor Kathy Huner City of Wauseon 230 Clinton Street Wauseon, OH 43567
Lynn Frank, Chair Delta Finance Committee 401 Main Street Delta, OH 43515	Steve Schneider, Chair Wauseon Finance Committee 230 Clinton Street Wauseon, OH 43567
Daphne Demaline, Chair Delta Development and Government Relations Committee Village of Delta 401 Main Street Delta, OH 43515	Sarah Heising, Chair Wauseon Utility Committee 230 Clinton Street Wauseon, OH 43567
Mark Jones Joe Howard Jeffery Mazurowski York Township Trustees 6955 Co. Rd. FG	Frank T. Onweller P.E., P.S. Fulton County Engineer 9120 County Road 14 Wauseon OH, 43567

Delta, OH 43515	
Jeff Rupp Joe Short Jon Rupp Fulton County Commissioners 152 S. Fulton Street Wauseon OH, 43567	Jackie Savage District Administrator Fulton County Soil & Water Conservation 8770 St. Rt 108 Suite B Wauseon, OH 43567

A copy of the model transmittal letter is included as **Attachment J**.

4906-6-07(a)(2): Service of Accelerated Application Upon Main Public Libraries of Each Political Subdivision

A copy of this accelerated application is being sent to the Wauseon Public Library located at 117 E Elm St, Wauseon, OH 43567.

4906-6-07(a)(3): Ohio Gas Company's Website

A copy of the accelerated application is located on Ohio Gas's web page at <https://www.ohiogas.com>.

Further interested persons may contact Adam Pietrzyk, Executive Vice President, at (800) 331-7396 or adam_pietrzyk@ohiogas.com to obtain either an electronic copy or a paper copy of this accelerated application.

4906-6-07(B): Proof of Compliance

Within seven (7) days of the filing of this accelerated application, Ohio Gas will cause proof of compliance with this requirement to be filed with the Board.

4906-6-08(A): Newspaper Notice

Because this accelerated application falls with the definition of Letter of Notification, within seven (7) days of the filing of this Letter of Notification, Ohio Gas will cause public notice of this Letter of Notification to be published in *The Village Reporter*.

Attachment K, the proposed newspaper publication fulfills the requirements 4906-6-08(A) (1) through (6).

4906-6-08(B): Notice to Property Owners and Tenants; Proof of Compliance

Within seven (7) days of the filing of this Letter of Notification, Ohio Gas will also send a letter describing the proposed facility to each property owner and affected tenant (**Attachment L**) that meets the requirements of OAC Rule 4906-6-08.

When the letter has been sent, Ohio Gas will cause a proof of compliance with the property owner/tenant letter requirements to be provided to the Board Staff.