

March 14, 2025

**Via Email: [David.Kovach@drbc.gov](mailto:David.Kovach@drbc.gov)**

David Kovach, P.G.  
Project Review Section Manager  
Delaware River Basin Commission  
PO Box 7360  
25 Cosey Road  
West Trenton, NJ 08628-0360

**RE: EXTENSION REQUEST FOR DOCKET NO. D-2017-009-2  
DOCK 2 AT DRP GIBBSTOWN LOGISTICS CENTER  
200 NORTH REPAUNO AVENUE  
GREENWICH TOWNSHIP, GLOUCESTER COUNTY, NJ**

Dear Mr. Kovach:

On behalf of the project owner, Delaware River Partners (DRP), Ramboll Americas Engineering Solutions, Inc. (Ramboll) is submitting a request for a three (3) year extension of Delaware River Basin Commission (DRBC) Docket Number D-2017-009-2 (Docket). The Docket was approved on June 12, 2019 for construction of the project known as Dock 2 at the property located at 200 North Repauno Avenue in Greenwich Township, Gloucester County, New Jersey (Site). On June 16, 2022, the Docket was extended for a period of three (3) years and is currently set to expire on June 12, 2025. If extended, the new Docket expiration date would become June 12, 2028.

Ramboll  
101 Carnegie Center  
Suite 200  
Princeton, NJ 08540  
USA

T +1 609 452 9000  
[www.ramboll.com](http://www.ramboll.com)

This request is submitted in accordance with the extension criteria set forth at CFR 401.41(a)(1)(i) through (iv) as follows:

*i. No material changes to the project as approved are proposed;*

DRP intends to construct the project as approved with no substantial material changes.

*ii. The condition of the project site has not changed in a manner important to determining whether the project would substantially impair or conflict with the Commission's Comprehensive Plan;*

The condition of the project has not changed in a manner that would impact the project's conformance with the Commission's Comprehensive Plan.

*iii. The Commission's Comprehensive Plan has not changed in a manner important to determining whether the project would substantially impair or conflict with the Comprehensive Plan; and*

The project has not changed from the original approval and as such, remains in conformance with the Comprehensive Plan last updated in July 2001.

iv. *The project sponsor is diligently pursuing the project as shown by its planning, construction or project operational activities, its project expenditures, its efforts to secure government approvals necessary for the project, or its active participation in appeals of government decisions on its applications for government approvals. The project sponsor is not required by this [paragraph \(a\)\(1\)\(iv\)](#) to conduct activities that it is not legally authorized to conduct or that it demonstrates would be unreasonable for it to conduct before obtaining all necessary final government approvals.*

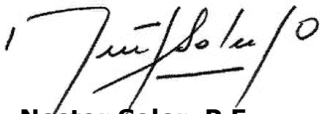
DRP has been diligently pursuing the project and has secured all required government approvals including but not limited to authorizations from the NJDEP Division of Land Resource Protection, NJDEP Bureau of Tidelands, and the US Army Corps of Engineers (USACE). However, due to market conditions and other factors, construction has been delayed. Significant expenditures have been made to secure and extend the required government approvals. DRP is currently in process of extending the US Army Corps of Engineers approval for the project and previously secured extension of NJDEP authorization.

We sincerely appreciate your time and attention to this request. Should you have any questions or require further information, please contact me at (609) 243-9814 or by email at [mdesmond@ramboll.com](mailto:mdesmond@ramboll.com). Thank you.

Sincerely,



**Maeve Desmond**  
Managing Consultant  
[mdesmond@ramboll.com](mailto:mdesmond@ramboll.com)



**Nestor Soler, P.E.**  
Principal  
[nsoler@ramboll.com](mailto:nsoler@ramboll.com)

MD/NDS:Imc  
1690000609\_Conv

Cc: Pam Bush, DRBC ([pamela.bush@drbc.gov](mailto:pamela.bush@drbc.gov))  
Sarah Hurt, DRP ([shurt@fipmidstream.com](mailto:shurt@fipmidstream.com))  
Hank Alexander, DRP ([halexander@fipmidstream.com](mailto:halexander@fipmidstream.com))  
Kate Campbell, Manko, Gold, Katcher & Fox, LLP ([KCampbell@mankogold.com](mailto:KCampbell@mankogold.com))