



September 24, 2018

Ms. Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Re: Mountain Valley Pipeline, LLC

MVP Southgate Project Docket No. PF18-4-000

Response to Scoping Comments

Dear Ms. Bose:

Pursuant to Section 157.21(f)(9) of the Commission's rules and regulations, Mountain Valley Pipeline, LLC ("Mountain Valley") is hereby submitting for filing in the captioned proceeding its response to the scoping comments that were submitted in the captioned proceeding through September 12, 2018.

If you have any questions, please do not hesitate to contact me (412-553-5786; meggerding@eqt.com) or William Lavarco (202-347-7127; William.lavarco@nee.com). Thank you.

Respectfully submitted,

MOUNTAIN VALLEY PIPELINE, LLC by and through its operator, EQM Gathering Opco, LLC

By:

Matthew Eggerding Senior Counsel, Midstream

Attachments

cc: Amanda Mardiney, OEP

John Peconom, OEP Allen Jacks, Cardno



Number	Source Name ¹	Issue of Concern	Addressed in Draft Resource Reports	Response
A - FERC Pr	ocess/ Comment Period			
A-1	Sappony Tribe	Because the proposed Southgate extension would cross the Tribe's ancestral lands and current population centers, the project is likely to affect properties of cultural significance to the Tribe. The Tribe is also concerned about potential environmental impacts, such as effects on water quality and wildlife. FERC should initiate consultation to address these concerns as soon as possible so the Tribe's interests can be considered at all stages of the review and permitting process.	Resource Report 4, Section 4.3.3.	The Project appreciates that the Sappony Tribe will participate in the Federal Energy Regulatory Commission ("FERC") review process. The Project has initiated consultation with the Tribe.
A-2	Monacan Indian Nation	The Monacan Indian Nation is a federally recognized tribe based in Amherst County, Virginia. Because the proposed Southgate extension would cross the Nation's ancestral lands, properties of cultural significance to the Nation would likely be affected by the project. The Nation is also concerned about potential environmental impacts, such as effects on water quality and wildlife. Consultation to address these concerns should be initiated as soon as possible so the Nation's interests can be considered at all stages of the review and permitting process.	Resource Report 4, Section 4.3.3.	The Project appreciates that the Monacan Indian Nation will participate in the FERC review process. The Project has initiated consultation with the Tribe.
A-3	Cheyenne River and Rosebud Sioux Tribes	Due to the Sioux tribes' prehistoric and historic connection to the geographic area containing the MVP Southgate Project, it is necessary that FERC include the Cheyenne River Sioux and Rosebud Sioux Tribes among those tribes in the FERC process.	Resource Report 4, Section 4.3.3.	The Project appreciates that the Cheyenne River Sioux and Rosebud Sioux Tribes will participate in the FERC review process. The Project has initiated consultation with the Tribes.
A-4	Virginia Department of Environmental Quality	In order to ensure an effective coordinated review of the NEPA document, notification of the NEPA document and federal consistency determination should sent directly to the VA DEQ through its Office of Environmental Impact Review (OEIR).	Not Applicable ("NA")	The Project appreciates that FERC will coordinate the National Environmental Policy Act ("NEPA") review process as requested.
A-5	North Carolina Department of Environmental Quality Natural Resources Defense Council Blue Ridge Environmental Defense League	Request to expand scoping period.	NA	In its August 9, 2018 Notice of Intent ("NOI") to Prepare an Environmental Impact Statement ("EIS"), the FERC states that it will consider filed comments during the preparation of the EIS.
A-6	Virginia Marine Resources Commission	We strongly encourage the applicant to work closely with the VDGIF and the VDCR regarding project specific impacts to freshwater aquatic resources for all waterbody crossings.	Resource Report 3, Section 3.5.2.1	The Project is consulting with the Virginia Department of Game and Inland Fisheries ("VDGIF") and the Virginia Department of Conservation and Recreation ("VDCR") regarding project specific impacts to freshwater aquatic resources for all waterbody crossings.
B - Mountain	Valley Pipeline, LLC	,	1	
B-1	Individual	MVP Southgate was very cooperative and answered questions of the landowner.	NA	Thank you for your comment.
B-2	Individual	Complaint against MVP Southgate for harassment.	NA	The Project has made a good faith effort to provide open, honest, and transparent communications to all stakeholders who may have an interest in or be impacted by the Project. Additionally, the Project team has been dedicated to providing accurate responses to questions and comments made during the scoping process, as well as during open houses and individual meetings with local officials and landowners along the proposed and alternate routes
B-3	North Carolina Department of Environmental Quality Blue Ridge Environmental Defense League Sierra Club Multiple Individuals	Concerned about Mountain Valley Pipeline, LLC's construction performance on the Mainline in West Virginia and Virginia and its ability to construct the MVP Southgate Project in an environmentally sound manner.	Resource Report 1, Section 1.4	The Project will adopt the FERC Upland Erosion Control, Revegetation, and Maintenance Plan ("Plan") and FERC Wetland and Waterbody Construction and Mitigation Procedures ("Procedures") to minimize impacts on the environment and it will develop its own Project-specific Erosion and Sediment Control Plan ("E&SCP") that will outline best management practices ("BMPs") to minimize impacts. In addition, the Project will train construction personnel on the environmental restrictions and/or requirements applicable to their particular job duties. The Project will provide construction management personnel and environmental inspectors with the appropriate environmental information/materials specific to the Project.
B-4	Multiple Individuals	The company is inappropriately referencing "eminent domain" to trespass on private property without the owner's approval for the purpose of surveying for a pipeline.	NA	The Project is vested by North Carolina and Virginia Statutes with the power of eminent domain for its work on the MVP Southgate Project. N.C.G.S. §40A-3(a)(1), 62-190(a) and Code § 56-49.01. Pursuant to these statutes, Mountain Valley Pipeline, LLC is authorized to enter upon any lands to make surveys, borings, examinations, and appraisals as may be necessary or expedient in carrying out and performing its rights or duties under these statutes provided Mountain Valley gives the requisite notice to the record owner(s) and possessor(s) of the land to which entry is authorized and sought. This authority exists whether or not Mountain Valley eventually condemns the entered land.

¹ Numerous agencies, organizations, and/or individuals made similar comments and were grouped accordingly to avoid repetition in this table. Additional agencies, organizations, and/or individuals may not all be listed; however, all relevant issues of concerns have been identified. In addition, certain individuals have raised concerns about impacts on specific features (such as wetlands, waterbodies, etc.) that may be present on their property; the Project will address these features in the final design after civil and environmental surveys are complete.

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B-5	Individual	MVP Drafts Resource Reports do not disclose the full breadth of impacts on the environment.	Resource Reports 1 through 12	Each Draft Resource Report provides a discussion of the existing environment that will be affected by the Project facilities, potential impacts on the environment, and the methods that the Project will implement to mitigate those impacts. The Project considers impacts on ground and surface waters; wetlands, vegetation, wildlife, and listed species; cultural resources, soils, geology, land use, air and noise as part of its Environmental Resource Report which will be included with the Certificate application expected to be filed in November 2018.				
C - Eminent D	Eminent Domain							
C-1	Sierra Club Multiple Individuals	Land acquisition and involuntary taking of land through eminent domain for private gain is wrong.	NA	If the FERC authorizes the Project, the pipeline company is granted the right of eminent domain under Section 7(h) of the Natural Gas Act. In this case, it would be the court that would determine the fair compensation given to a landowner in return for an easement. The Project will negotiate a mutually agreed-upon easement for the pipeline with the affected landowners.				
C-2	Individual	What is proper venue for the court system with regards to eminent domain?	NA	If the FERC authorizes the Project, the pipeline company is granted the right of eminent domain under Section 7(h) of the Natural Gas Act. In this case, it would be the court that would determine the fair compensation given to a landowner in return for an easement. The proper venue is the state or federal court district wherein the property is located.				
D - Support P	Project							
D-1	Virginia Chamber North Carolina Chamber Virginia Oil & Gas Association Virginia Petroleum Council North Carolina Petroleum Council Individual	Support for the Project due to economic gains.	NA	Thank you for your support. Mountain Valley agrees that the Project will provide economic benefits. Economic benefits will be discussed further in its application to FERC.				
E - Oppose P	Project							
E-1	Multiple Individuals	Multiple individuals oppose the Project.	NA	Comment noted.				
F - Purpose a								
F-1	Blue Ridge Environmental Defense League Multiple Individuals	Project is meant for export of gas overseas	Resource Report 1, Section 1.1.2	The MVP Southgate Project is not designed to provide natural gas to any liquefied natural gas export terminal and has no intention of seeking authorization under Section 3 of the Natural Gas Act to export natural gas. The Project terminates at an inland location more than 185 miles from the nearest coastal Virginia port, 155 miles from the nearest coastal North Carolina port, and even farther from the nearest liquefied natural gas export terminal. Accordingly, Mountain Valley does not have the physical ability to export natural gas. As currently designed, gas transported on the MVP Southgate system will be delivered into customers' existing facilities in Eden and Graham, North Carolina. The Project's anchor shipper, PSNC Energy, has committed to 300 million cubic feet per day of firm transportation service and will use the gas it transports to serve its fast growing residential, commercial and industrial markets in North Carolina.				
F-2	Blue Ridge Environmental Defense League North Carolina Conservation Network Multiple Individuals	This project is not needed and does not serve the public convenience and necessity. No need for additional fossil fuel infrastructure beyond what already exists to supply our energy needs. The developers of the proposed Mountain Valley Pipeline extension have not demonstrated the pipeline is needed to meet demand or is in the public interest. FERC Must Independently Assess the Need for the Project The Project is not needed as it will not benefit Rockingham and Alamance counties, North Carolina.	Resource Report 1, Section 1.1.2 Resource Report 5, Sections 5.4.1, 5.4.2.1, and 5.4.2.2	As stated in Draft Resource Report 1, the purpose of the Project is to: (1) meet the growing needs of natural gas users in the southeastern U.S.; (2) add a new natural gas transmission pipeline to provide competition and enhance the reliability and resiliency of the existing pipeline infrastructure in North Carolina and southern Virginia; and (3) provide North Carolina and southern Virginia with direct pipeline access to the Marcellus and Utica gas regions in West Virginia, Ohio and southwestern Pennsylvania. The Project will enhance the diversity of gas supply and create additional pipeline capacity in the region. This includes benefits to Rockingham and Alamance counties, North Carolina. The Project will provide information on labor, equipment materials, services, jobs, and estimated, long-term, ad valorem tax revenues in final Resource Report 5 included with the Certificate application expected to be filed in November 2018.				
F-3	North Carolina Department of Environmental Quality	The FERC must evaluate whether the affected region in North Carolina has a demand for natural gas capacity and whether the construction of a new pipeline -the Project as proposed - is the best alternative to meet that demand.	Resource Report 1, Section 1.1.2	See the purpose and need section of Draft Resource Report 1, which details the anchor shipper's need for pipeline capacity as well as why it elected to contract with Mountain Valley over other options to meet its needs. As part of its certificate application review, FERC will consider need for the Project. FERC looks to shipper contracts as evidence of need for new pipeline facilities. FERC may also take into account market studies and other evidence filed by the Applicant and intervenors in determining need.				
F-5	Sierra Club Blue Ridge Environmental Defense League Appalachian Mountain Advocates Protect Our Water Heritage and Rights Multiple Individuals	We do not need more gas in Virginia or North Carolina. The environmental impacts of producing Natural Gas has been well -documented – from the local level impacts to its contribution to climate change. FERC must consider the impacts of MVP Southgate Project resulting from increased shale gas drilling. Gas production extraction and transport are forcing utility ratepayers into decades of unnecessary fossil fuel use, resulting in generally very high methane emissions, even if they are inadvertent.	Resource Report 1, Section 1.1.2	As stated in Draft Resource Report 1, last year, PSNC Energy, a wholly-owned subsidiary of SCANA Corporation ("PSNC Energy"), solicited interest from existing and proposed interstate pipeline providers for additional natural gas transportation capacity. The Project will provide PSNC Energy additional direct access to low-cost natural gas produced in the prolific Marcellus and Utica shale regions. PSNC Energy will have more competitive and diverse options for natural gas supply. PSNC Energy will gain optionality in selecting best-cost supply sources and will be able to take advantage of price differentials across more gas supply regions.				



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			NA	The Project is a natural gas transmission project. Natural gas production, including hydraulic fracturing, is outside the scope of FERC's jurisdiction and of the Project. NEPA does not require FERC to review impacts that are not causally related to the proposed project or reasonably foreseeable. The impacts of natural gas production are not generally considered by FERC in its assessment of natural gas pipeline projects. The impacts from the exploration, drilling, and processing of natural gas should not be considered here because the timing of such development is uncertain, the activities involve different types of physical processes, and the production and processing of natural gas prior to shipment in a pipeline is regulated separately by federal, state, and local regulations. In addition, it is not possible to foresee the precise natural gas supplies that will be transported by the Project because it is not possible to trace back each molecule of gas to its source.
F-6	Individual	This pipeline is not needed. The demonstrated need can be conflated if PSNC is approved to buy a 30% share in the project.	Resource Report 1, Section 1.1.2	As stated in Draft Resource Report 1, PSNC Energy is a local distribution company primarily engaged in the purchase, transportation, distribution, and sale of natural gas to more than 563,000 customers in North Carolina. PSNC Energy solicited interest because it requires additional pipeline capacity to meet forecasted incremental demand on its distribution system. Over the past four years, PSNC Energy has experienced a 15 percent increase in peak daily throughput on its system. This trend will carry forward into the future, as PSNC Energy expects its design day requirements to increase an additional 11 percent over the next five years. This past, present, and future demand growth on PSNC Energy's system reflects, at least in part, the substantial population increase in North Carolina. North Carolina's population is expected to increase by nearly 2 million people between 2020 and 2035. PSNC Energy committed to 300 million cubic feet per day of firm transportation service to be made available by the Project. Mountain Valley and PSNC Energy entered into binding long-term agreements in December 2017 that made PSNC Energy an anchor shipper for the Project.
F-7	Individual	Does the need assessment for the MVP Southgate Project take into account the Atlantic Coast Pipeline?	Resource Report 1, Section 1.1.2	See the purpose and need section of Draft Resource Report 1, which details the anchor shipper's need for pipeline capacity as well as why it elected to contract with Mountain Valley over other options (including Atlantic Coast Pipeline) to meet its needs. FERC will consider Atlantic Coast Pipeline as a project alternative to the MVP Southgate Project in its NEPA process. FERC's need determination generally does not second guess a shipper's business decision to enter into contracts with a specific pipeline project to meet increased demand.
F-8	Individual	This pipeline leads to future spinoffs and more environmental damage.	Resource Report 1, Section 1.6	As stated in Draft Resource Report 1, the Project has no current plans for either future expansion or abandonment of the facilities. Should the Project propose any future expansion or abandonment of Project facilities, the Project will seek the appropriate authorizations from FERC and other federal and state agencies as applicable.
G - Benefit			<u> </u>	
G-1	Multiple Individuals	Jobs and taxes will be short-term, no long term benefit to community	Resource Report 5, Sections 5.4.1 and 5.4.2.2	The Project will provide information on jobs and estimated, long-term, ad valorem tax revenues generated by the Project in final Resource Report 5 included with the Certificate application expected to be filed in November 2018.
H - Engineeri	ng and Construction			
H-1	Virginia Petroleum Council	The Project team has worked diligently to establish a route that both minimizes the project's impact on the environment and accommodates property owners' requests.	NA	Thank you for your comment. During Project development, the Project conducted an extensive review of potential pipeline routes to identify viable pipeline corridors, and then further refined the review to determine the most feasible route within the most favorable corridor. One of the Project's primary objectives with respect to pipeline routing was to avoid or minimize, to the extent possible crossings of major population centers and significant environmental resources. The Project also attempted to route its pipeline adjacent to existing rights-of-way, where feasible. See Draft Resource Report 10, Section 10.5.1.
H-2	North Carolina Department of Environmental Quality	Provide notification to the proper Regional Office if "orphan" underground storage tanks (USTs) are discovered during any excavation operation.	NA	The Project will provide notification to the proper Regional Office if "orphan" underground storage tanks ("USTs") are discovered during any excavation operation.
H-3	North Carolina Department of Environmental Quality	Demolition or renovations of structures containing asbestos material must be in performed in compliance with 15A NCAC 20.11 I O(a)(I).	NA	If required, the Project will perform demolition or renovations of structures containing asbestos material in compliance with 15A NCAC 20.11 I O(a)(I).
H-4	North Carolina Department of Environmental Quality	Any hazardous waste generated from the demolition, construction, operation, maintenance, and/or remediation (e.g. excavated soil) from the proposed Project must be managed in accordance with the North Carolina Hazardous Waste Rules.	NA	The Project will manage hazardous waste generated from any future demolition, construction, operation, maintenance, and/or remediation (e.g. excavated soil) from the proposed in accordance with the North Carolina Hazardous Waste Rules.
H-5	North Carolina Department of Environmental Quality	During the Project, every feasible effort should be made by the applicant to minimize the generation of waste, to recycle materials for which viable markets exist, and to use recycled products and materials in the development of this Project where suitable. Any waste generated by this Project that cannot be beneficially reused or recycled must be disposed of at a solid waste management facility approved to manage the respective waste type.	NA	The Project will make every feasible effort to minimize the generation of waste, to recycle materials for which viable markets exist, and to use recycled products and materials in the development of the Project where suitable. Any waste generated by the Project that cannot be beneficially reused or recycled will be disposed of at a solid waste management facility approved to manage the respective waste types.



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H-6	Roanoke River Basin Association Multiple Individuals	Construction and maintenance of the Project has the potential to incur significant costs to a wide range of values – cultural, historic, economic, aesthetic – held by landowners and communities in its path. These costs should be weighed against realistic estimates of the benefits to these values. This accounting should heavily favor public values over private corporate values.	NA	As part of its certificate review process, FERC will consider as part of the need for the project the adverse impacts on landowners and communities and balance any harms to these interests with the overall benefits of the project.
H-7	Individual	How deep will the trench be in areas outside of areas where it would be 6 to 10 feet?	Resource Report 1, Section 1.4.1.1 Resource Report 6, Appendix 6-C	Pipeline depths greater than 10 feet may be used where the horizontal directional drill ("HDD") method will be used (Dan River and Stoney Creek Reservoir crossings). The Project will provide specific information on HDD installations in its final Resource Reports 1 and 6 included with the Certificate application expected to be filed in November 2018.
H-8	Individual (Cruciger, L.P.)	Landowner does not want contractor yards for temporary use during construction on or near property. Notice and relevant supporting documents do not provide location of contractor yards or assessment of environmental impacts of contractor yards.	NA	The Project will avoid this property.
H-9	Individual	Landowner wants to use driveway and farm road for construction access and is concerned trucks will sink.	Resource Report 1, Section 1.3.3	As discussed in Draft Resource Report 1, Section 1.3.3, the Project will use private roads, drives, lanes, and other roads during construction and operation. Other roads may include existing access roads installed for agricultural, wells or construction access, or may be farm roads, all-terrain vehicle paths/trails, etc. Maintenance or upgrading may be required on some of the existing roads prior to use by construction equipment. A number of the existing dirt or gravel access roads will be graded and maintained to prevent rutting. Others may require widening or placement of additional stabilization means including but not limited to gravel or crushed stone on the existing surface to ensure safe travel conditions. Maintenance or upgrading of access roads will ensure safe passage of construction vehicles to and from the Project work area.
I - Alternative	s			
I-1	North Carolina Department of Environmental Quality	The Department requests that the FERC thoroughly evaluate alternatives, in addition to the proposed Project that, cumulatively consider costs, benefits, and environmental impacts and offers the following overarching comments pertaining to the alternatives analysis process and its environmental impacts in North Carolina.	Resource Report 10	In Draft Resource Report 10, the Project thoroughly evaluated a range of alternatives that include energy and system alternatives, pipeline route alternatives and variations, and compressor station alternatives. These include alternatives in North Carolina as well as Virginia.
I-2	North Carolina Department of Environmental Quality	Concern that the four alternatives proposed in NOI excludes non-natural gas energy alternatives and the NOI Presents vague description of how the commission will address environmental issues and impact	Resource Report 10, Sections 10.3.1 and 10.5.3	The Project evaluated the four route alternatives shown in the FERC's NOI in Draft Resource Report 10, Section 10.5.3. The Duke Powerline Alternative is analyzed as FERC Alternative 6; Sandy Cross Road Alternative is analyzed as FERC Alternative 3; Alamance Eastern Alternative is analyzed as FERC Alternative 4; and Alamance Southern Alternative is analyzed as FERC Alternative 5. As stated in Draft Resource Report 10, Section 10.3.1, renewable energy sources, such as wind, solar, geothermal, and biomass are increasing in capacity and diversify the fuels used to generate electricity. However, these sources are not completely or economically interchangeable with natural gas. Renewable energy sources cannot meet the objectives of the Project or its anchor shipper to provide natural gas for typical local distribution uses (e.g., home heating, cooking and industrial uses). In addition, renewable energy does not meet the purpose of the Project to provide new natural gas transmission pipeline capacity that will increase competition and enhance the reliability and resiliency of the existing pipeline infrastructure in North Carolina and southern Virginia.
I-3	North Carolina Department of Environmental Quality	In its alternatives analysis, the Commission should consider the State's existing energy policies including North Carolina's Renewable Energy and Energy Efficiency Portfolio Standard and the 2017 Competitive Energy Solutions for North Carolina Act, in addition to the large-scale voluntary actions underway across the State to increase the use of renewable energy, energy storage, and energy efficiency measures in the private sector.	Resource Report 10, Section 10.3.1	See Reponses to Comment No. I-2.
1-4	Multiple Individuals	Opposed to Alamance Southern Alternative (Alternative 5). Concerned about impacts that could occur along Alternative 5 including those to cultural resources, family cemetery, fence lines, pastures and drinking water for livestock, local wildlife and habitat, multiple crossing of Back Creek, and use of land. Additional concerns along the Alternative 5 include safety, property use and value, benefits to the community, and need.	Resource Report 10, Section 10.5.3	The Project conducted an additional evaluation of FERC Alternative 5 (Alamance Southern Alternative) and eliminated this alternative from further consideration as its preferred pipeline route because of its greater length and associated land and environmental disturbances.
I-5	Multiple Individuals	Need to seek alternative routes that are non-disruptive alternatives. Pipeline route should go around urban areas.	Resource Report 10, Section 10.5.1	As discussed in Draft Resource Report 10, Section 10.5.1, during Project development, the Project conducted an extensive review of potential pipeline routes to identify viable pipeline corridors, and then further refined the review to determine the most feasible route within the most favorable corridor. One of the Project's primary objectives with respect to pipeline routing was to avoid or minimize, to the extent possible crossings of major population centers and significant environmental resources. The Project also attempted to route its pipeline adjacent to existing rights-of-way, where feasible.



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I-6	Multiple Individuals	Support renewable energy. There are other alternatives for cleaner energy; if this project wasn't solely for profit and they really cared about the environment and people affected, they would be pursuing alternative methods.	Resource Report 10, Section 10.3.1.	As stated in Draft Resource Report 10, Section 10.3.1, renewable energy sources, such as wind, solar, geothermal, and biomass are increasing in capacity and diversify the fuels used to generate electricity. However, these sources are not completely or economically interchangeable with natural gas. Renewable energy sources cannot meet the objectives of the Project or its anchor shipper to provide natural gas for typical local distribution uses (e.g., home heating, cooking and industrial uses). In addition, renewable energy does not meet the purpose of the Project to provide new natural gas transmission pipeline capacity that will increase competition and enhance the reliability and resiliency of the existing pipeline infrastructure in North Carolina and southern Virginia.
I-7	Individual (Katie Whitehead)	At the MVP open house on June 28, the MVP route engineer showed us an alternate route that would cross Rt. 29 even further south and protect a residence near the highway, as well as, our tree farm from further encroachment and permanent damage. This alternate route was not listed among the alternative routes in FERC materials available at the August 21st scoping meeting. I ask that the Commission seek out information about this alternative route and fully consider it.	NA	The alternative discussed during the MVP open house was reviewed by the Project team and determined unfavorable due its longer length and greater ground disturbance.
I-8	Individual	Is the proposed pathway of the Project the most efficient path for moving gas from the north to the south or is the Project maximizing future profits by prepositioning infrastructure to exploit the Dan River Basin while having the people of NC and VA pay for it?	NA	The pathway of the MVP Southgate Project was primarily determined by the delivery locations of PSNC, the anchor shipper for the project. PSNC's existing pipeline system includes facilities in the Dan River area that is uses to serve its natural gas customers. FERC also prefers that applicants co-locate the proposed facilities with existing facilities to minimize incremental environmental impacts. Mountain Valley accomplished this by routing the first approximately 33 miles of the pipeline in close proximity to the existing Transcontinental Gas Pipe Line Company, LLC ("Transco") pipeline.
I-9	Individual	Can the MVP Southgate Project and Atlantic Coast Project be combined?	Resource Report 1, Section 1.1.2 Resource Report 10, Section 10.4.3	See the purpose and need section of Draft Resource Report 1, which details the anchor shipper's need for pipeline capacity as well as why it elected to contract with Mountain Valley over other options (including Atlantic Coast Pipeline) to meet its needs. Atlantic Coast Pipeline proposes new facilities in eastern North Carolina and a substantial expansion of these facilities would be required to serve the same delivery locations proposed for the MVP Southgate Project. As discussed in Draft Resource Report 10, Section 10.4.3, to meet the objectives of the MVP Southgate Project, this pipeline system would require over 100 miles of new pipeline infrastructure in North Carolina and/or Virginia that would result in environmental impacts greater than those that would occur as a result of the Project.
I-10	Individual	FERC should investigate whether there is excess capacity in Williams' existing lines. If not, FERC should determine whether one or more of Williams' lines could be replaced with a larger diameter pipe.	Resource Report 1, Section 1.1.2 Resource Report 10, Section 10.4.2	See the purpose and need section of Draft Resource Report 1, which details the anchor shipper's need for pipeline capacity as well as why it elected to contract with Mountain Valley over other options (including Transco) to meet its needs. The Project considered the Transco system as system alternative in Draft Resource Report 10, Section 10.4.2. FERC will consider Transco as a project alternative to the MVP Southgate Project as part of its NEPA alternatives analysis.
J - Water Use	and Quality			
J-1	North Carolina Department of Environmental Quality	The Water Planning Section of the Division of Water Resources recommends that MVP: 1. Conduct an inventory of all wetlands and perennial and intermittent waterways. 2. Detail the proposed techniques for the use (withdrawal) of surface waters. 3. Register any Water Withdrawals associated with hydrostatic testing of pipeline as required	Resource Report 2, Sections 2.3, 2.3.3, and 2.4, Appendix 2-A and 2-B	The Project has conducted an inventory of waterbodies and wetlands (see Sections 2.3 and 2.4 and Appendix 2-A and 2-B of Draft Resource Report 2. Section 2.3.3 of Draft Resource Report 2 provides information on hydrostatic test water and withdrawals including the techniques that will be used to conduct the tests and the amount of water that the Project expects to use. The Project will register water withdrawals associated with hydrostatic testing of pipeline as required.
J-2	North Carolina Department of Environmental Quality	This Project proposes to impact stream, wetland, and protected riparian buffers in the Jordan Lake Watershed. The U.S. Army Corps of Engineers has determined a 404 permit is required, therefore a 401 water quality certification from DWR is also required. Impacts to the protected riparian buffer will likely trigger a riparian buffer authorization from DWR and could require a variance depending on the proposed impacts.	NA	The Project is working with the U.S. Army Corps of Engineers, Norfolk and Wilmington Districts, and the states and intends to file a Section 404 Permit Application and Section 401 Water Quality Certification for impacts on waters of the U.S., including wetlands.
J-3	Blue Ridge Environmental Defense League	A stream by stream analysis needs to be completed for the entire MVP Southgate route. Effects to groundwater and aquifers need to be fully understood. Effects on drinking water for communities, individuals, farms and animals need to be fully addressed.	Resource Report 2, Sections 2.3, 2.2, 2.2.4.3	Draft Resource Report 2 provides information on surface waters (Section 2.3), groundwater and aquifers (Section 2.2) including potential Project effects and mitigation (Section 2.2.4.3). The Project will evaluate landowner complaints or damage associated with construction. In the unlikely event that a private well is impacted by Project construction, the Project will negotiate a settlement with the landowner that will include a temporary water supply to affected homeowners while their well is repaired or replaced. If an impact occurs to a livestock well or an irrigation well, the Project will provide a temporary water source to sustain livestock while a new permanent water supply well is constructed. The Project will not provide temporary water sources for crops, but would compensate landowners for any losses in crops resulting from irrigation system damage.
J-4	Virginia Marine Resources Commission	The Virginia Commission has defined the minimum size of non-tidal waterways as those perennial streams with a drainage area equal to or greater than 5 square miles or with a mean annual instream flow of 5 cubic feet per second. VMRC will exert jurisdiction over all proposed stream crossings which meet this referenced threshold.	NA	Comment noted.



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J-5	Virginia Marine Resources Commission	For the jurisdictional stream crossings, appropriate construction methodologies for buried utilities routinely permitted by the Commission include: directional drill, cofferdam construction, dam and pump or flume-around technology.	Resource Report 1, Section 1.4.1.1 Resource Report 2, Section 2.3 and Appendix 2-A	Construction methodologies for waterbody crossings are discussed in Draft Resource Report 1, Section 1.4.1.1. Additional information is provided in Section 2.3 and Appendix 2-A of Draft Resource Report 2. Appendix 2-A provides information including the water body name, its location, flow type, and the construction method the Project expects to use to cross the waterbody.
J-6	Virginia Marine Resources Commission	The instream construction activities shall be accomplished during low flow periods utilizing dam and pump, flume around or within cofferdams constructed of non-erodible materials in such a manner that no more than half the width of the waterway is obstructed at any point in time. All areas of State-owned bottom and adjacent lands disturbed by this activity shall be restored to their original contours and natural conditions within thirty (30) days from the date of completion of the authorized work. All excess materials shall be removed to an upland site and contained in such a manner to prevent its reentry into State waters.	Resource Report 2, Sections 2.3.1.4 and 2.3.6	As discussed in Draft Resource Report 2, Section 2.3.1.4, all in-stream work will be conducted during low-flow periods to the extent practicable. Section 2.3.6 of Draft Resource Report 2 provides construction and operation impacts and mitigation for the Project. The construction method utilized at each waterbody crossing will vary with the characteristics of the specific waterbody and will be performed consistent with permit conditions outlined in the regulatory permit approvals. In addition, the Project will implement the FERC Plan and FERC Procedures such that restoration shall be considered successful if the right-of-way surface condition is similar to adjacent undisturbed lands, revegetation is successful, and proper drainage has been restored.
J-7	Virginia Marine Resources Commission	A contingency plan must be provided for any crossings utilizing the directional drill method to address potential frac-outs or related spills associated with any directional drilling activities.	NA	The Project is developing a HDD Contingency Plan that will be provided in final Resource Report 2 included with the Certificate application expected to be filed in November 2018.
J-8	Virginia Department of Conservation and Recreation	Project potentially impacts the established Banister River water trail and the potentially scenic Sandy River.	Resource Report 2, Appendix 2-A, Section 2.3.6 Resource Report 8, Section 8.4.1.1	As shown in Appendix 2-A of Draft Resource Report 2, the Project will cross the Banister River at milepost ("MP") 5.2 and the Sandy River at MP 17.9. Draft Resource Report 8, Section 8.4.1.1, states that a review of the VDCR scenic rivers map identified a legislatively designated section of the Banister River located approximately 0.19 mile east of MP 5.2 and the Sandy River at MP 17.9 that has been identified as being worthy of future study for a scenic designation. Potential impacts on these waterbodies are provided in Section 8.4.1.1. These waterbodies will be crossed using the dry crossing method, Section 2.3.6 of Draft Resource Report 2 provides a discussion on the measures that will be implanted to avoid potential impacts with this crossing method.
J-9	Appalachian Mountain Advocates	FERC must assess the impact of the Project on aquatic resources, including surface and groundwater.	Resource Report 2, Sections 2.3, 2.2, and 2.2.4.3	Draft Resource Report 2 provides information on surface waters (Section 2.3), groundwater and aquifers (Section 2.2) including potential Project effects and mitigation (Section 2.2.4.3).
J-10	Appalachian Mountain Advocates	The EIS must analyze the full range of potential impacts of water crossings, and must consider alternative methods and locations, as well as temporal restrictions to avoid disrupting birds during certain seasons.	Resource Report 2, Section 2.3 Resource Report 3, Section 3.3.3	The Project provides a full assessment of potential waterbody impacts in Draft Resource Report 2, Section 2.3. During Project development, the Project conducted an extensive review of potential pipeline routes to identify viable pipeline corridors, and then further refined the review to determine the most feasible route within the most favorable corridor. One of the Project's primary objectives with respect to pipeline routing was to avoid or minimize, to the extent possible crossings of significant environmental resources. An analysis of migratory birds, potential impacts and mitigate is provided in Resource Report 3, Section 3.3.3. The Project will implement measures during Project development, construction, and operation, as applicable, to limit effects to migratory birds. Proposed conservation measures are based on those described in U.S. Fish and Wildlife ("USFWS") Nationwide Conservation Measures, USFWS National Bald Eagle Management Guidelines, VDGIF Bald Eagle Guidelines for Landowners, and the FERC Plan and FERC Procedures.
J-11	Roanoke River Basin Association	Dewatering structures (designed to accept waste water used to test for leaks or flush the pipe) should be positioned at least 50 yards from any wetland, surface water, surface water channel (including ephemeral channels), and karst feature. This buffer distance will help reduce probability of water contamination by the waste water.	Resource Report 2, Section 2.3.6	The Project will implement the FERC Procedures and its BMPs for dewatering. The trench will be dewatered (either on or off the construction right-of-way) in a manner that does not cause erosion and does not result in silt-laden water flowing into any waterbody. Dewatering structures will be removed as soon as practicable after the completion of dewatering activities.
J-12	Roanoke River Basin Association	Level 4 piping standards should be required for all crossings of navigable waters. The PHMSA data base shows there are proportionately more pipeline accidents at river crossings compared to other pipeline miles. Shoring up piping standards to Level 4 at crossings of navigable waters would provide benefits to river health and to nearby people and property.	NA	While the MVP Southgate Project pipeline is still in the design phase, studies are being performed to determine Pipeline and Hazardous Materials Safety Administration ("PHMSA") Class Location. The corresponding design factor will be used along the pipeline to ensure compliance. On the current proposed route, the pipeline does not cross navigable waters.
J-13	Protect Our Water Heritage and Rights Multiple Individuals	Concerned about impacts on waterbodies and groundwater during construction. Degradation of water quality would also impose collateral economic impacts on the communities along the route. How will private wells and groundwater be impacted by the trench and blasting? evaluate, on a timely basis, landowner complaints regarding potential damage resulting from blasting to wells, homes, or outbuildings	Resource Report 2, Sections 2.3, 2.2, 2.2.4.3, 2.2.4.2 and 2.3.6.	See Response to Comment No. J-9. Potential impacts on private wells and groundwater as a result of trenching are described in Section 2.3.6 of Draft Resource Report 2. Section 2.2.4.2 provides a discussion on blasting impacts on water supply wells and mitigation measures. The Project will implement measures to avoid, minimize, and mitigate potential impacts to water supply wells from blasting including controlled blast conducted by highly trained contractors; if blasting is conducted within 150 feet of an active water well, the Project will conduct a preconstruction evaluation of the well with landowner permission; and evaluate, on a timely basis, landowner complaints regarding potential damage resulting from blasting to wells, homes, or outbuildings.



Number	Source Name ¹	Issue of Concern	Addressed in Draft Resource Reports	Response
J-14	Multiple Individuals	What protections are in place to prevent drinking water contamination? What chemicals are used to coat drill heads in the drilling process to lay the pipes? How is methane detected in drinking water and surface water? Consider impacts on Groundwater contamination due to drilling chemicals used during construction and potential underground natural gas leaks or explosions	Resource Report 2, Sections 2.2.4, 2.3.3, and 2.3.6	Potential impacts on drinking water supplies are discussed in Section 2.2.4 and 2.3.6 of Draft Resource Report 2. As discussed in Section 2.3.3, for hydrostatic test water no chemicals will be added to the test water unless otherwise approved by FERC and applicable federal and/or state regulatory agencies and no desiccant or chemical additives will be used to dry the pipe. In addition, Section 2.3.4 addresses the potential for additives in the bentonite slurry for horizontal directional drills. Section 2.3.6 states that construction equipment, vehicles, hazardous materials, chemicals, fuels lubricating oils, and petroleum products will not be parked, stored, or serviced within a 100-foot radius of any waterbody and will be placed within secondary containment.
J-15	Multiple Individuals	Concerned about impacts on wells, sewer, and/or septic systems. Concerned about water well contamination. The pipeline poses well documented risks to the shallow water wells that supply clean drinking water for area residents, businesses and farmers.	Resource Report 2, Sections 2.3, 2.2, 2.2.4.3, 2.2.4.2 and 2.3.6. Resource Report 8, Section 8.3.2	See Response to Comment Nos. J-9 and J-13. As discussed in Section 8.3.2 of Draft Resource Report 8, if septic systems are identified that may be affected by construction, the Project will first attempt to identify a minor pipeline deviation to avoid direct impact on the septic system. If avoidance is not possible, the Project will work with the individual landowner to coordinate relocation and / or replacement of the septic system prior to construction.
J-16	Multiple Individuals	Consider impacts on Haw River and Cape Fear River Basin.	Resource Report 2, Sections 2.3.1.1 and 2.3.6	In Virginia, the Project will cross the Roanoke and Yadkin Rivers Basin and in North Carolina it will cross the Roanoke River Basin, Cape Fear River Basin, and the Haw River Basin (see Section 2.3.1.1 of Draft Resource Report 2). Potential project impacts and mitigation for waterbody crossing along the Project route within these basins are described in Section 2.3.6. The Project will implement the measures in the FERC Procedures and Project-specific E&SCP to minimize impacts on surface and groundwater resources.
J-17	Multiple Individuals	Consider impact on the Jordan Lake watershed and Stoney Creek Reservoir, Alamance County, NC. How would the Jordan Lake rules and nutrient management or buffer regulations affect this project?	Resource Report 2, Sections 2.3.2.6, 2.3.1.3, and 2.3.6	Section 2.3.2.6 of Draft Resource Report 2 provides information on the North Carolina Jordan Lake Riparian Buffer Area. Jordan Lake is located approximately 25 miles southeast of the southern extent of the Project, the Project crosses the Jordan Lake riparian buffer zone watershed in Rockingham and Alamance counties. As described in Section 2.3.1.3, the Project will cross the Stoney Creek Reservoir at approximate MP 63.6. Potential project impacts and mitigation for waterbody crossing along the Project route, including these areas, are described in Section 2.3.6. The Project will implement the measures in the FERC Procedures and Project-specific E&SCP
				to minimize impacts on surface and groundwater resources and it will abide by state requirements / permit conditions for the Jordan Lake riparian buffer watershed.
J-18	Multiple Individuals	What streams would be crossed by the proposed route? How will they be protected? How will impaired streams be protected?	Resource Report 2, Section 2.3.2.5	See Response to Comment No. J-9. Section of Draft Resource Report 2 provides information on contaminated sediments and impaired waters. The Project has reviewed the National Sediment Quality Survey for information regarding contaminated sediments at all waterbody crossings. None of the watersheds in the Project area are listed as containing areas of probable concern for sediment contamination. The Project will construct all of its pipeline crossings using a dry construction technique if there is flowing water at the time of construction. The Dan River and Stoney Creek Reservoir will be crossed using the HDD construction method. BMPs will be implemented during construction to control soil erosion and sedimentation down gradient of areas. With the implementation of these measures, no additional impairment to designated waterbodies in the Project areas is anticipated.
J-19	Individual	What is the total water usage that will be needed for the compressor stations and in construction of the pipeline? What is that water supply? The river? Municipal supplies? How would the municipalities be compensated for this use?	Resource Report 2, Resource Report 2, Sections 2.3, 2.2, 2.2.4.3, and 2.3.3	Information on hydrostatic test water is provided in Draft Resource Report 2, Section 2.3.3.
J-20	Individual	How many public and private waterways and sources have been identified along the proposed route? How will private springs and drinking water sources be protected?	Resource Report 2, Sections 2.2.3.2 and 2.2.4.1	Draft Resource Report 2, Section 2.2.3.2 provides information on private wells within 150 feet of the Project construction workspace. For private wells and spring identified within 150 feet of the construction works area, the Project will clearly mark the wellhead or spring and surround it with silt fence and/or safety fence (if landowner access is provided) as a precaution for construction equipment and activities. To further mitigate the potential for land disturbance associated with the pipeline to impact a water resource, the Project will implement construction practices including the FERC Plan and FERC Procedures and a Project-specific Spill Prevention, Control and Countermeasure Plan that will be included in final Resource Report 2 with the Certificate application expected to be filed in November 2018. In addition, water supply identification, characterization and pre-construction sampling will be addressed in further detail in the Project's Water Resources Identification and Testing Plan in final Resource Report 2 included with the Certificate application expected to be filed in November 2018.
J-21	Individual	Concerned about construction and operation in FEMA flood zones.	Resource Report 2, Section 2.3.1.2 and Appendix 2-C	Information on flood zones is provided in Section 2.3.1.2 of Draft Resource 2 and shown on Figure 2-C-3 in Appendix 2-C. The Project will restore pipeline facility temporary workspaces, including the areas within FEMA flood zones, as closely as practicable to pre-construction contours. Restoration of pre-construction contours will preserve the existing flood storage capacity of the FEMA flood zones in temporary construction workspace. Approximately 2.4 acres of 100-year flood zone in North Carolina will be permanently altered as a result of the Project. The Project will obtain the necessary



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				state and/or local permits required in Virginia and North Carolina, specifically working with the Rockingham County and Alamance County Planning Departments.
J-22	Individual	The pipeline will affect natural resources, especially the Dan River.	Resource Report 2, Sections 2.3, 2.2, 2.2.4.3, 2.3.1.3 and 2.3.6	See Response to Comment No. J-9. As described in Section 2.3.1.3, the Project will cross the Dan River at approximate MP 30.2. The Project is proposing to HDD the Dan River to minimize any potential impacts to the river. Potential project impacts and mitigation for waterbody crossing along the Project route, including the Dan River, are described in Section 2.3.6. The Project will implement the measures in the FERC Procedures and Project-specific E&SCP to minimize impacts on surface water resources
J-23	Individual	Concerned about wetland that adjoins property.	Resource Report 2, Section 2.4.4	Construction and operation impacts and mitigation for wetlands are discussed in Section 2.4.4 of Draft Resource Report 2.
K - Vegetatio	n, Wildlife, and Rare Threatened and Endangered	d Species		
K-1	North Carolina Department of Environmental Quality	Any open burning associated with subject proposal must be in compliance with 15A NCAC 02D.1900.	NA	The Project will conduct any open burning in North Carolina in compliance with 15A NCAC 02D.1900.
K-2	Blue Ridge Environmental Defense League	The environmental and economic impacts of loss and degradation of forestland and farmland associated with the MVP Southgate project need to be properly considered.	Resource Report 3, Section 3.4.5 Resource Report 8, Sections 8.2.3.1, 8.2.3.3, and Section 8.2.3.4.	Draft Resource Report 3, Section 3.4.5 considers construction impacts and mitigation for vegetation, including forest land. In Draft Resource Report 8, land use impact and mitigate for agricultural land is provided in Section 8.2.3.1, forest/woodland in Section 8.2.3.3, and silviculture in Section 8.2.3.4.
K-3	Roanoke River Basin Association	Mitigation for trees removed during pipeline construction and maintenance should be at a 5:1 ratio to offset the greenhouse gas (GHG) effects of pipe leakage. (Five new trees should be planted for every tree removed for the pipeline right of way.)	NA	If required, mitigation for the removal of trees will be implemented in accordance with applicable regulatory requirements.
K-4	Appalachian Mountain Advocates	FERC must thoroughly analyze the environmental impacts, including cumulative impacts, of forest fragmentation and related issues caused by the proposed Project and alternative routes. The EIS must also consider the impacts of fragmentation and increased edge forest on the spread of invasive species, "many of which are associated with disturbance and can degrade native habitat quality."	Resource Report 3, Section 3.3.	The Project evaluated large tracts of forested land in the siting process to avoid fragmentation where practicable. As discussed in Draft Resource Report 3, Section 3.3.4, to minimize impacts from loss of forest cover and forest fragmentation, the Project is intentionally collocated with existing utility corridors and other disturbed lands (see Section 1.3.1 of Resource Report 1). On August 10, 2018 the Project received a comment letter from North Carolina Wildlife Resources Commission ("NCWRC") that recommended 14 specific locations where minor deviations from the current route would reduce forest fragmentation and riparian impacts at stream crossings. The Project is currently evaluating these recommendations and if feasible, will incorporate revisions into its final Resource Report 3 included with the Certificate application expected to be filed in November 2018.
K-5	Virginia Department of Conservation and Recreation	VDCR-DNH recommends the development and implementation of an invasive species plan to be included as part of the maintenance practices for the right-of-way (ROW).	Resource Report 3	The Project will include an Exotic and Invasive Species Control Plan in its final Resource Report 3 included with the Certificate application expected to be filed in November 2018.
K-6	Virginia Department of Conservation and Recreation	Brosville Quad: Piedmont Barbara's-buttons, Downy phlox, and American bluehearts have been historically documented within the study area.	Resource Report 3, Section 3.5.2.1	Rare piedmont plant species are discussed in Section 3.5.2.1 of Draft Resource Report 3.
K-7	Multiple Individuals	Concerned about loss of road frontage that grows hundreds of mature Loblolly Pines and mixed hardwoods. The proposed pipeline comes across in front of a home and down front yard to the road. This will take about half of our property and most of the trees. All of the trees in front of our home will be gone. Destruction of wooded areas of property will affect visual quality.	Resource Report 3, Section 3.4.5 Resource Report 8, Section 8.3.2	As discussed in Section 3.4.5 of Draft Resource Report 3, In upland areas, trees or deep-rooted shrubs will be removed from the construction ROW and will not be permitted to grow within the 50-foot-wide permanent right-of-way. For any residences located within 50 feet of the construction work space, the Project will avoid removal of mature trees and landscaping to the extent possible (see Section 8.3.2 of Draft Resource Report 8).
K-8	Individual	Consider impacts on vegetation and wildlife along the along the Haw River Corridor.	Resource Report 3, Sections 3.3 and 3.4	The Project discusses potential impacts on wildlife and vegetation along the Project route that includes the Haw River and its associated corridor in Sections 3.3 and 3.4 of Draft Resource Report 3.
K-9	North Carolina Department of Environmental Quality	The proposed Project will traverse parts of the Dan and Haw river basins. Several rare, threatened, and endangered species are found in this region of the state, including the Federal Endangered Roanoke Logperch.	Resource Report 3, Section 3.5.2.2	Endangered and threatened species along Dan and Haw rivers are discussed in Section 3.5.2.2 of Draft Resource Report 3.
K-10	Blue Ridge Environmental Defense League	Thoroughly catalog and consider impacts to Protected, Endangered and Threatened Species on federal and state listings. Avoidance of activity during spawning and nesting seasons is a must. Impacts to migratory birds need to be studied. Impacts to gaming species needs to be weighed as to not to interfere with citizen's rights to hunt and fish.	Resource Report 3, Sections 3.2, 3.3, and 3.5 Resource Report 8 Section 8.4.1.1	Endangered and threatened species and migratory birds are discussed in Section 3.5 of Draft Resource Report 3; aquatic species are discussed in Section 3.2, and wildlife are discussed in Section 3.3 of Resource Report 3. Hunting is discussed in Section 8.4.1.1 of Draft Resource Report 8.



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K-11	Virginia Department of Conservation and Recreation	VDCR-DNH recommends coordination of survey results with the USFWS and the VDGIF to ensure compliance with protected species legislation.	Resource Report 3, Section 3.5	Upon completion of field surveys, all results will be submitted to applicable state and federal agencies (USFWS and VDGIF) for review and comment and filed with the FERC.
K-12	Virginia Department of Conservation and Recreation	VDCR-DNH supports conducting surveys for state and federally listed Small whorled pogonia. VDCR-DNH requests a copy of the state and federally listed Smooth coneflower survey report conducted during the 2018 field season and a copy of the Small whorled pogonia report upon completion. VDCR-DNH also requests a copy of the 2018 bat survey upon completion.	Resource Report 3, Section 3.5	The Project will provide survey reports for small whorled pogonia, smooth coneflower, and bats to the VDCR-DNH upon completion.
K-13	Virginia Department of Conservation and Recreation	Chatham Quad: According to a VDCR zoologist, potential exists for rare mussels to occur in the Bannister River at the proposed crossing.	Resource Report 3, Section 3.5	Project coordination with USFWS, VDGIF, and VDCR-NHP is ongoing. The Project will provide the results of its aquatic surveys upon completion.
K-14	Virginia Department of Conservation and Recreation	All Quads: VDCR recommends an inventory for rare Piedmont plants within the study area and rare freshwater mussels at the Banister River.	Resource Report 3, Section 3.5.2.2	Rare piedmont plant species are discussed in Section 3.5.2.1 of Resource Report 3.
K-15	Virginia Department of Conservation and Recreation	Spring Garden Quad: Transco Road Net Conservation Site is located within the study area. The Transco Road Net Conservation Site has been given a biodiversity significance ranking of B3, high significance, for Tri-colored bat. VDCR recommends coordination with the VDGIF, Virginia's regulatory authority for the management and protection of this species.	Resource Report 3, Section 3.5	The Transco Road Net Conservation Site is avoided by the Project. Results of the bat studies will be filed upon completion.
K-16	Virginia Marine Resources Commission	In an effort to minimize adverse impacts to threatened and endangered fish and mussel species, instream surveys and species relocations may be required. No instream construction shall be conducted during any recommended time-of-year restrictions of any year unless waived by VDGIF in writing.	Resource Report 3, Section 3.5	Project coordination with federal and state resource conservation agencies is ongoing. The Project will comply with applicable time of year restrictions, or will seek the appropriate waivers from those restrictions.
K-17	Appalachian Mountain Advocates	FERC must consider the harm to species, including federally protected species that could be caused by the Project.	Resource Report 3, Sections 3.2, 3.3, and 3.5	The Project has considered potential impacts on fisheries, wildlife, and federally protected species in Sections 3.2, 3.3, and 3.5 of Resource Report 3.
K-18	Multiple Individuals	Concerned that wildlife habitat would be destroyed. Federal and state wildlife officials submitted their concerns about the potential damage to threatened and endangered species and their habitats, including freshwater mussels, bats and bald eagles.	Resource Report 3, Sections 3.2, 3.3, and 3.5	See Comment Response No. K-17.
K-19	Individual	Consider impacts on Endangered and Threatened Species including Cape Fear Shiner, Yellow Lampmussel, and Eastern Creekshell.	Resource Report 3, Section 3.5	Endangered and threatened species are discussed in Section 3.5 of Resource Report 3.
K-20	Individual	The rolling hills of this area are populated by many species of animals and plants which are considered endangered. Questions the methodology to survey for these species.	NA	The Project submitted its survey protocols to the USFWS, VDGIF, and VDCR-DNH for review and approval. All surveys for endangered and threatened species have been and will be conducted in accordance with approved protocols.
L - Cultural R	Resources	1	1	
L-1	Blue Ridge Environmental Defense League	Impacts to local heritage and community valued sites (historic homes, farms, cemeteries, sacred lands, landscapes) need to be fully addressed.	Resource Report, 4, Section 4.5	The Project is conducting comprehensive cultural resources studies of the proposed route in accordance with State Historic Preservation Office and FERC Procedures, and is also contacting tribes and local heritage groups to solicit information concerning cultural resources in the Project area. Potential impacts to cultural resources will be fully addressed in technical reports and in the EIS
L-2	Chickasaw Nation	Both NC and VA are outside of the Chickasaw Nation aboriginal homeland area and the Chickasaw Nation is not aware of specific historic properties in the project area.	NA	Thank you for your comment.
L-3	Preservation Virginia	Concerned for potential rural historic sites and landscapes, including in Little Cherrystone and Berry Hill Road areas on Pittsylvania County, Virginia. Requests to receive all archaeological and architectural reports.	Resource Report, 4, Section 4.5	See Response to Comment No. L-1.
L-4	Multiple Individuals	Concerned about impacts on cultural resources. Concerned about family cemetery on the property.	Resource Report, 4, Section 4.5	The Project is committed to avoiding cemeteries, which are being identified during the on-going field surveys, in the construction work area. Should the Project find that it is not possible to avoid effects to all National Register of Historic Places ("NRHP")-listed and –eligible resources, then, in consultation with the Virginia Department of Historic Resources ("VA DHR") and North Carolina Historic Preservation Office ("NC HPO"), interested Native American tribes and other interested parties, the Project will develop appropriate steps to be taken to mitigate adverse effects to significant cultural resources.
L-5	Multiple Individuals	Questions the methodology used to survey for cultural resources. Which cultural landmarks have you identified along the proposed route? There are 80 historical sites near the corridor and 20 within. What are you going to do about cemeteries along this route?	Resource Report, 4, Section 4.3	As noted in Section 4.3 of Draft Resource Report 4, the Project has reached out to a number of federal, state, and local agencies, tribes, and local heritage organizations, regarding cultural resources related to the Project. Following discussions with the VA DHR and NC HPO cultural resources staff, the Project has initiated both archaeological and historic architectural field surveys within the mutually agreed-upon Area of Potential Effects for direct and indirect effects. The Project's cultural resources team continues to reach out to local, state and federal governments about local cultural resources concerns. Section 4.4.3 of Draft Resource Report 4 describes the Project's communications with Native



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				American tribes to ask for concerns they may have about the Project and MVP's offer to meet with tribes who would want to discuss details of the Project. The Project has also reviewed all comments filed with the FERC related to cultural resources concerns and had discussions with stakeholders who participated in the community outreach meetings that the Mountain Valley sponsored in the Project area. The Project team continues to take into consideration all of the concerns expressed about cultural resources and potential effects of the Project. Efforts are underway to plan the Project in a way that will avoid or minimize effects to cultural resources that may be listed in, or may be eligible to be included in, the NRHP.
L-6	Individual	Consider impacts on Haw River Trail, Alamance County, NC; Glencoe Mill Village, National Historic Landmark; Arches Grove United Church of Christ.	Resource Report, 4, Section 4.5	See Response to Comment No. L-1.
L-7	Individual	A historical site (Burlington —Hillsborough stage coach trail) would be affected.	Resource Report, 4, Section 4.5	See Response to Comment No. L-1.
L-8	Individual	Landowner property has two buildings listed in the Alamance County Architectural Inventory as Historic Places; and, two family cemeteries dating before 1835.	Resource Report, 4, Section 4.5	See Response to Comment No. L-4.
M - Socioeco	nomics			
M-1	North Carolina Chamber	The Project will provide jobs, generate property taxes.	NA	Thank you for your comment.
M-2	Blue Ridge Environmental Defense League	A thorough examination and investigation of impacts to minority and low income communities especially in regards, but not limited, to Title VI of the Civil Rights Act. This should include more than just analysis of county and state statistics, but needs to also include the local, affected community data.	Resource Report 5, Sections 5.3.8 and 5.4.8	The Project has conducted a thorough analysis of minority and low income communities in Draft Resource Report 5. Environmental Justice and effects on minority or low income populations in Sections 5.3.8 and 5.4.8. Construction and operation of the Project are not expected to result in adverse and disproportionate human health or environmental effects to these communities.
M-3	North Carolina Conservation Network Multiple Individuals	Any jobs or tax revenue created by the construction of the pipeline will be short term and will not provide any lasting benefits to the public. North Carolina and Virginia ratepayers would be forced to pay for this unnecessary increase in capacity.	Resource Report 5, Sections 5.4.1 and 5.4.2.2	The Project will provide information on jobs and estimated ad valorem tax revenues in final Resource Report 5 included with the Certificate application expected to be filed in November 2018.
M-4	Appalachian Mountain Advocates	FERC must consider the environmental justice implications of authorizing the Project.	Resource Report 5, Sections 5.3.8 and 5.4.8	See Response to Comment No. M-2.
M-5	North Carolina Department of Environmental Quality	The Department recommends the Commission affirm that EJ is a major consideration and address EJ throughout its evaluation of the Project. In particular, the Department suggests that the FERC consider the long-term effects on the communities impacted by the Project.	Resource Report 5, Sections 5.3.8 and 5.4.8	See Response to Comment No. M-2. The Project concluded in Section 5.4.8 that revenues from construction employment, local expenditures by the construction companies for construction materials, and non-local construction workers for temporary housing, food, and entertainment will temporarily benefit the local economy. The increased property tax base during Project operation will be beneficial in the long-term. Local communities will benefit from ad valorem taxes paid annually by the Project over the life of the MVP Southgate Project.
M-6	North Carolina Department of Environmental Quality	In addition to long-term impacts, in the conduct of its review, it is vital that the Commission evaluate and understand the very real consequences that the short-term effects of the Project's construction may have on vulnerable populations.	Resource Report 5, Sections 5.4 and 5.4.3	In Draft Resource Report 5, Section 5.4 the Project states that construction impacts from the Project will be short-term and localized, due primarily to the short construction period and small composition of the labor force. Potential effects associated with construction of the Project could result in minor temporary increases in the local population, demand for temporary housing, and use of temporary public services such as police, fire, and medical services. This would include both Environmental Justice and non- Environmental Justice populations. In Section 5.4.3 the Project states that during construction of the Project, the presence of construction workers immigrating to the Project area will increase the demand for temporary short-term housing. However, the large number of available vacant housing units indicates that the temporary demand for these facilities is unlikely to displace permanent residents or adversely affect housing prices. This would include both Environmental Justice and non- Environmental Justice populations.
M-7	North Carolina Department of Environmental Quality	The Commission must conduct or require MVP to provide follow-up communications and outreach activities with potential Environmental Justice populations identified during the EJ analysis. Meaningful engagement with vulnerable populations will be essential to MVP and the FERC as they gather public input during the certification process.	Resource Report 5, Section 5.3.8.1 Resource Report 1, Section 1.8	The Project has conducted outreach in both Environmental Justice and non- Environmental Justice communities. As discussed in Draft Resource Report 5, Section 5.3.8.1, to facilitate public involvement and outreach, the Project has developed a Public, Stakeholder, and Agency Participation Plan that outlines a commitment to engage actively with stakeholders throughout the life cycle of the Project and provides the steps the Project has identified to ensure successful ongoing communication with stakeholders. In addition, in June 2018, the Project planned and conducted three community Open Houses in locations along the route. The FERC also held three scoping sessions in August 2018. In its August 9, 2018 NOI, the FERC states that it will consider all filed comments during the preparation of the EIS.



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M-8	North Carolina Department of Environmental Quality	The Department suggests that the Commission expand its public outreach efforts beyond only those affected landowners. In order to include all potentially impacted parties, the Commission should require MVP to contact individuals within a designated geographic buffer area that extends along the proposed pipeline route. Every stakeholder who resides, works, or recreates within this buffer area of the Project should be notified early and often throughout the certification process.	Resource Report 1, Section 1.8	In June 2018, the Project planned and conducted three community Open Houses in locations along the route. The FERC also held three scoping sessions in August 2018. In its August 9, 2018 NOI, the FERC states that it will consider all filed comments during the preparation of the EIS. In addition, the Project continues to hold meetings with local associations, affected public groups, and other non-governmental organizations; state and local government representatives; and state and federal agencies.
M-9	Multiple Individuals	Concerned about impacts on tourism.	Resource Report 5, Section 5.4.3.1	As discussed in Draft Resource Report 5, Section 5.4.3.1, construction of the Project is not anticipated to adversely impact the tourist season in the region. However, short-term impacts, including temporary increases in dust, noise, and traffic from Project construction is expected but are not anticipated to adversely impact tourism in the region. If any potential conflicts are identified with tourism, mitigation measures will be evaluated, which may include timing of construction to avoid peak use periods, maintaining access to businesses at all times, and expediting construction through the areas frequented by tourists. The Project will coordinate directly with affected stakeholders on an individual basis to further reduce potential adverse effects.
M-10	Individual	In Alamance, 18.5% of the population is at or below poverty level. In Rockingham, 19.6% of the population is at or below poverty level. With these demographics, these counties become targets for corporations to exploit communities who do not have the time, education, or finances to defend their rights.	Resource Report 10, Section 10.5.1	As discussed in Draft Resource Report 10, Section 10.5.1, during Project development, the Project conducted an extensive review of potential pipeline routes to identify viable pipeline corridors, and then further refined the review to determine the most feasible route within the most favorable corridor. One of the Project's primary objectives with respect to pipeline routing was to avoid or minimize, to the extent possible crossings of major population centers and significant environmental resources.
M-11	Individual	The pipeline also poses very real threats to the safety and economic viability of our area. Who will respond to pipeline issues from fire to leaks to landslides? How are they funded? Who pays for the cleanup and damages if no bonds or other financial security instruments are provided? Who pays for the damages to the growing and vitally important eco-tourism industry anchored by our many creeks, streams, rivers and sacred lands?	Resource Report 11	Reliability and safety of the Project is fully discussed in Draft Resource Report 11. The Project facilities will be designed, constructed, operated, and maintained in accordance with or to exceed the U.S. Department of Transportation ("USDOT") PHMSA minimum federal safety standards in 49 CFR 192 (see Resource Report 11 for more detail). These regulations, which are intended to protect the public and to prevent natural gas facility accidents and failures, apply to all areas along the proposed pipeline routes regardless of the presence or absence of minority or low income populations.
N - Geologic	Resources		,	
N-1	Virginia Division of Geology and Mineral Resources	The pipeline route runs parallel to the well-documented Chatham Fault. This normal fault is not seismically active and is inclined away from the pipeline. For most of its length, the pipeline is approximately 3 miles to the northwest of the Chatham Fault.	Resource Report 6, Section 6.5.2	Draft Resource Report 6, Section 6.5.2 indicates that the Project reviewed the U.S. Geologic Survey Quaternary Fold and Fault database to identify any Quaternary faults that would be crossed or encountered by the Project facilities. No faults were identified in the vicinity of the Project facilities.
				The Project researched the Chatham Fault and found that it is a normal fault that was last active in the Mesozoic and which separates the crystalline rocks of the Piedmont to the west from the Triassic basin sediments to the east.
				The proposed Project facilities are located in a relatively lower seismic risk area as compared to other seismically active areas of the United States such as California and Alaska. The Project facilities will be constructed to meet or exceed federal standards for natural gas pipeline safety (49 Code of Federal Regulations Part 192), and will be constructed in accordance with International Building Code IBC 2012 (Chapter 16 and Section 1613) and American Society of Civil Engineers ASCE 7-10, Minimum Design Loads for Buildings and Other Structures. Based on the absence of quaternary faults crossed by the Project, the relatively low seismic risk in the Project area, and operation of existing facilities in the region, impacts from earthquake-related ground shaking are not anticipated to affect construction or operation of the Project.
N-2	Virginia Marine Resources Commission	If it is determined that blasting is necessary at any of the crossings, VDGIF shall be notified a minimum of 48 hours in advance of the blasting.	NA	If it is determined that blasting is necessary at any of the waterbody crossings, the Project will notify the VDGIF a minimum of 48 hours in advance of the blasting.
N-3	Multiple Individuals	"Cherry Lane Blast Geo Formation" - an event happened about 1987 in the Cherry Lane - Highway 54 juncture. Substantial damage was done to a house as a result of blasting that occurred to lay pipe in this area. Because of the rock formations present in this area, blasting caused substantial damage to multiple houses requiring the company doing the blasting to pay substantial amounts of money to rebuild foundations, sidings and replace interior drywall. Concerned that a similar situation could happen as a result of blasting for the Project. What will the damage be to homes and land from the blasting?	Resource Report 6, Section 6.3 and Appendix 6-B	Draft Resource Report 6, Appendix 6-B, provides preliminary locations of areas crossed by the pipeline where shallow depth to bedrock (less than five feet) may be present. These areas may require blasting or other methods of mechanical rock removal during excavation of the pipeline trench. If blasting is required, it will be completed in accordance with applicable State and local regulations and performed by Virginia and North Carolina State-licensed blasters. Blasting will be conducted by highly trained contractors. All blasting will be conducted during daylight hours and will not begin until occupants of nearby buildings, stores, residences, places of business, and farms have been notified. Blasting will be conducted in accordance with the Project Blasting Plan, which is being developed by an experienced firm who is assisting the Project in the development of blasting protocols. The Blasting Plan will be provided in final Resource Report 6 included with the Certificate application expected to be filed in November 2018.
N-4	Multiple Individual	Impacted counties in both states have uranium reserves that are often found near the ground's surface. This issue needs to be thoroughly examined prior to any land disturbance activity. The project should collect well data around a 5 mile radius of the pipeline. Continuous air monitoring should be required during construction. Dosimeters should be provided to residences and workers within 5 miles of the pipeline.	Resource Report 6, Section 6.4	Uranium deposits identified in the vicinity of the Project area are located at Coles Hill, in Pittsylvania County, Virginia. The Coles Hill deposit is located approximately 3.6 miles northeast of MP 0.0 of the H-650 pipeline. Based on the distance from the Project, no impacts on the uranium deposits are anticipated and no impacts from construction or operation of the Project on the uranium deposits are anticipated.



Number	Source Name ¹	Issue of Concern	Addressed in Draft Resource Reports	Response
N-5	Individual	Dismantling of bedrock, our natural protection against earth quakes.	Resource Report 6, Section 6.5.2	Based on the absence of quaternary faults crossed by the Project, the relatively low seismic risk in the Project area, and operation of existing facilities in the region, impacts from earthquake-related ground shaking are not anticipated to affect construction or operation of the Project.
N-6	Individual	Concerned about construction in karst areas.	Resource Report 6, Section 6.5.6	Draft Resource Report 6, Section 6.5.6 provides information on karst terrain. Qualified geologists contracted by the Project are currently evaluating the Project alignment to confirm the presence of karst terrain.
				The Project is completing extensive and careful field review and additional geotechnical evaluation, as necessary, in karst areas crossed by the Project. Route variations will be considered to avoid sinkholes and caves, and to minimize impacts to the karst hydraulic system. Additional, information will be provided in final Resource Report 6 included with the Certificate application expected to be filed in November 2018.
N-7	Individual	Martin Marietta, Eastern Alamance Granite Quarry – active pit mining operation producing granite aggregate products using substrate blasting for extraction. Located within 1 mile of proposed pipeline route. Below-ground structures, including buried pipelines, are susceptible to vibration impacts of blasting.	Resource Report 6, Section 6.4	The Martin Marietta – East Alamance Quarry is approximately 0.1 mile east of the pipeline route. The Project facilities will be designed, constructed, operated, and maintained by experienced firms in accordance with or to exceed the USDOT PHMSA minimum federal safety standards in 49 CFR 192 (see Resource Report 11 for more detail). These regulations, which are intended to protect the public and to prevent natural gas facility accidents and failures, apply to all areas along the proposed pipeline routes. No effects on the quarry operation are anticipated from construction or operation of the Project.
O - Soils				
O-1	Blue Ridge Environmental Defense League Multiple Individuals	Concerned about sedimentation, increased siltation and erosion during construction.	Resource Report 7, Section 7.4.1	Draft Resource Report 7, Section 7.4.1 provide information on soil erosion and sediment control. The Project's objective is to minimize the potential for soil erosion and sedimentation during construction of the Project facilities and to effectively restore and revegetate disturbed areas upon completion of construction activities. The Project will implement the FERC Plan to establish a baseline for minimizing the potential for erosion as a result of water or wind action and to aid in reestablishing vegetation after construction. In addition, the Project will minimize disturbance associated with construction activities through the application of BMPs included the Project-Specific E&SCP.
O-2	Virginia Marine Resources Commission	Erosion and sediment control measures shall be in conformance with the 1992 Third Edition of the Virginia Erosion and Sediment Control Handbook and shall be employed throughout construction.	NA	The Project will ensure that its erosion and sediment control measures are in conformance with the 1992 Third Edition of the Virginia Erosion and Sediment Control Handbook and that these measures will be employed throughout construction. The Project will continue to consult with state agencies during the permitting process to identify additional site-specific mitigation measures.
O-3	Multiple Individuals	All of the trees will be cut down on our property alone. By cutting down trees, we are exposing land to erosion and causing sedimentation in streams. Concerned about steep slopes impacted by clear cuts and sedimentation.	Resource Report 7, Section 7.4.1	See Response to Comment No. O-1.
O-4	Individual	Approximately 20 miles of the proposed Project would traverse erodible soils within Alamance County and without proper engineering and construction oversight, erosion and sediment from the construction of the proposed pipeline could have severe negative consequences for the County's lakes, streams, and the Haw River as well as its domestic, agricultural, and business water supplies.	Resource Report 7, Section 7.4.1	See Response to Comment No. O-1. In addition, as required by the FERC Plan and FERC Procedure, the Project will employ trained Environmental Inspectors who will have the authority to stop activities that are not in compliance with the environmental conditions of the FERC's Orders, stipulations of other environmental permits or approvals, or landowner easement agreements; and to order appropriate corrective action.
P - Land Use	, Recreation, and Aesthetics		1	
P-1	North Carolina Department of Environmental Quality	The routes and alternative routes of the proposed Project may encroach into conservation easements held by the State or private entities. If there is any suspicion or likelihood of encroachment into conservation easements, the applicant must consult with the easement holder(s) as early in the application process as possible.	Resource Report 8, Section 8.4	Federal, state, recreation, and conservation lands crossed by or located within 0.25 mile of the Project that have already been identified are described in Table 8.4-1 in Draft Resource Report 8 and known conservation easements are provided. U.S. Department of Agriculture, Natural Resources Conservation Service easement properties crossed by the Project are shown in Table 8.4-2. The Project continues to consult with landowners, local and state agencies to identify parcels that conservation easements.
P-2	Blue Ridge Environmental Defense League	Impacts to recreational and sporting lands should be properly considered.	Resource Report 8, Section 8.4	The Project considered potential effects on recreational land in Draft Resource Report 8, Section 8.4. Project-related activities are not expected to significantly affect the overall recreation and tourism experiences of residents and visitors to the region. Impacts to important recreation resources on public lands would be minimized through consultation with the appropriate land management agencies.
P-3	Blue Ridge Environmental Defense League	Increase in truck traffic on local roadways and those impacts on public safety need to be considered.	Resource Report 8, Sections 8.2.3.5 and 8.3	Traffic is discussed in Draft Resource Report 8, Sections 8.2.3.5 and 8.3. The Project will incorporate measures to maintain safety and minimize traffic disruption, and ensure that construction activities will not prevent the passage of emergency vehicles. Measures may include the creation of temporary travel lanes during construction or the placement of steel plate bridges to allow continued traffic flow during open trenching. Traffic lanes and residential access will be maintained, except for the temporary periods essential for pipeline installation. Provisions will be made to allow passage of emergency vehicles at all times. In areas where traffic volumes are high or other circumstances (e.g., congested areas) exist, the Project may employ traffic control measures to ensure the safety of pedestrians and vehicles.



Number	Source Name ¹	Issue of Concern	Addressed in Draft Resource Reports	Response
P-4	Multiple Individuals	Any project that requires the removal of trees in a 100-foot wide strip across any part of our tree farm would severely disrupt our business. A 50-foot wide strip on which trees could never be planted would reduce permanently our business and decrease permanently the value of our property.	Resource Report 8, Section 8.2.3.4	As discussed in Draft Resource Report 8, Section 8.2.3.4, the Project will work with the landowner to maintain access to wooded portions of their property for silviculture during the construction of the pipeline. The Project will compensate landowners for the value of trees felled within the construction work areas and to the extent future forestry activities were affected this impact would be considered as part of the easement negotiations. During operation of the pipeline, affected landowners will be asked to contact the Project prior to any logging activities that include use of heavy equipment across the permanent right-of-way. Subsequent activities by the Project may include staking of the centerline and implementing measures to protect the pipe from logging equipment during harvesting.
P-5	Multiple Individuals	Church's plans to increase the size of its cemetery would be curtailed by the pipeline. Concerned about building a dream home on property shared with pipeline. There will be no future building on land if pipeline is built.	NA	Construction of major facilities, including homes, pools, decks, tool sheds, barns and septic tanks, will not be permitted in the permanent right-of-way to protect the integrity of the pipeline. However, each easement will be fairly negotiated with the landowner.
P-6	Multiple Individuals	Concerned about removal and relocating electric and telephone lines, including septic tank. Pipeline would destroy family farm and road; water, sewer, and phone lines. Concerned about impacts on farming, crops, and livestock.	Resource Report 8, Section 8.2.3.1	As discussed in Draft Resource Report 8, Section 8.2.3.1, impacted agricultural land will be restored to pre- construction conditions in accordance with the FERC Plan following construction. Agricultural land affected by the construction right-of-way and additional temporary workspace would be allowed to revert to prior use, with the exception of tree crops within the permanent right-of-way. The Project will work with landowners to understand post-construction land use activity and the construction would be designed in order to allow use of the easement for farming activity and to identify specific areas where heavy machinery could cross the easement without damaging the pipeline. Construction of major facilities, including pools, decks, tool sheds, barns and septic tanks, will not be permitted in the permanent right-of-way.
P-7	Multiple Individuals (Kelly and Daniel Bollinger)	Proposed pipeline route would have forestry impacts and a forestry program that the landowner has entered into. The landowner must maintain 20 acres to receive tax breaks.	NA	The Project will avoid this property.
P-8	Individual	Concerned about loss of privacy.	Resource Report 8, Sections 8.3.2 and 8.5.1	For any residences located within 50 feet of the construction work space, the Project will avoid removal of mature trees and landscaping to the extent possible (see Section 8.3.2 of Draft Resource Report 8). As discussed in Draft Resource Report 8, Section 8.5.1, where the pipeline traverses forested areas, visual impact will be longer term due to vegetation maintenance within the 50-foot-wide permanent right-of-way. These effects are typically most noticeable where the pipeline crosses roads or cuts through wood lots, or where vegetation is removed between the permanent right-of-way and residences. To the extent practicable, the Project has attempted to avoid large tracts of forest land to reduce potential visual impacts on the landscape.
P-9	Individual	Williams is also proposing a fourth pipeline on land (Hill View Farm) that will further expand the pipeline easement. An expanded easement will affect farming operations during and after construction.	Resource Report 8, Section 8.2.3.1	As discussed in Draft Resource Report 8, Section 8.2.3.1, following construction, the Project will restore impacted agricultural land to pre-construction conditions in accordance with the FERC Plan. Agricultural land affected by the construction right-of-way and additional temporary workspace will be allowed to revert to prior use. The Project will design the pipeline to allow continued farming activities, and will work with landowners to understand post-construction land use activity and identify specific areas where heavy machinery could cross the right-of-way without damaging the pipeline.
Q - Property	Value and Use			
Q-1	Appalachian Mountain Advocates	FERC must consider the impacts of the pipeline on property owners and community character.	Resource Reports 5 Resource Reports 8	In Draft Resource Reports 5 and 8, the Project considered the effects of the pipeline on property owners and community character.
Q-2	Multiple Individuals	Concerned about negative effects on property values.	Resource Report 5, Section 5.4.4	As discussed in Draft Resource Report 5, Section 5.4.4, several studies have examined the effects of gas pipelines on sales and property values. A study on "The Effect of Natural Gas Pipeline on Residential Value" performed by Diskin et al. (2011) could "not identify a systematic relationship between proximity to [a] pipeline and sale price or value." A study conducted by Integra Realty Resources for the Interstate Natural Gas Association of America ("INGAA") Foundation in 2016 found that "There is no measurable impact on the sales price of properties located along or in proximity to a natural gas pipeline versus properties which are not located along or in proximity to the same pipeline." The 2016 INGAA Foundation study reviewed underground FERC-regulated natural gas transmission pipelines in residential areas in the Midwest, Northeast, Mid-Atlantic and Southeast. In addition, a study by Gnarus Advisors LLC (2012) examined whether proximity to pipelines, with a focus on natural gas pipelines, has an effect on residential property values. The study contains a literature review specific to pipelines and property values, with a focus on actual sales data. The authors conclude that there is "no credible evidence based on actual sales data that proximity to pipelines reduces property values." Further, they found that "hypothetical surveys of actual or potential market participants should not be used as a substitute for the systematic analysis of market data, as they may overstate the effects, if any, of proximity to disamenities, including pipelines, on property values."



Number	Source Name ¹	Issue of Concern	Addressed in Draft Resource Reports	Response			
Q-3	Individual	Landowner already has multiple electric utility towers that stretch over a significant portion of the property and impinges on land use. Ability to use the land to the best advantage would be further hampered.	NA	See Response to Comment No. P-5.			
R - Air and N	- Air and Noise Quality						
R-1	North Carolina Department of Environmental Quality	The Project will likely require an air quality permit issued by the Division of Air Quality (DAQ) in the Department for the compressor station associated with the proposed pipeline.	Resource Report 9, Section 9.2.3	As indicated in Draft Resource Report 9, Section 9.2.3, the Project will include its North Carolina State Air Permit Application in the final Resource Report 9 included with the Certificate application expected to be filed in November 2018.			
R-2	North Carolina Department of Environmental Quality	The Department recommends that FERC analyze both the upstream and downstream greenhouse gas (GHG) emissions associated with the MVP Southgate Project as part of its alternative analysis.	Resource Report 9, Sections 9.2.4.5 and 9.2.6	The Project discusses the Greenhouse Gas Reporting Rule in Section 9.2.4.5 of Draft Resource Report 9 and climate change and greenhouse gases in Section 9.2.6.			
R-3	Blue Ridge Environmental Defense League	Air cumulative impacts from existing facilities need to be considered.	Resource Report 9, Section 9.2.6	Draft Resource Report 9, Section 9.2.6, and Table 9.2.11 presents information on the major existing and reasonably foreseeable future projects that may cumulatively or additively impact air quality that could be affected by the construction and operation of the Project along with an approximate distance from the nearest Project facility.			
R-4	Appalachian Mountain Advocates Individual	FERC must consider the climate change Impacts of the pipeline resulting from increased greenhouse gas emissions.	Resource Repot 9, Section 9.2.6	The Project considered climate change and greenhouse gases in Section 9.2.6 of Draft Resource Repot 9.			
R-5	Multiple Individuals	What systems will be put in place to monitor toxic air pollutants that will be released at the compressor stations? Have folks in the area of the proposed compressor station (Eden/Leaksville) been notified? Will they be notified about the 1 ton a year of volatile organic compounds (VOCs) that are emitted by compressor stations and have been associated with several serious health problems, including cancers?	Resource Report 9, Sections 9.2.4.3, 9.2.4.6, Resource Report 11, Section 11.4.4	Draft Resource Report 9, Section 9.2.4.3 describes monitoring requirements. The Project will perform annual performance tests in accordance with 40 CFR Part 60, Subpart KKKK to demonstrate compliance with the NOX emission limitations, or as an alternative, will continuously monitor the appropriate parameters to determine whether each turbine is operating in low-NOX mode in accordance with §60.4340(b)(2)(ii) and §60.4355(a). In Virginia under 9 VAC 5-50: New and Modified Sources, upon the request of the State Air Pollution Control Board, the owner or operator may be requested to continuously monitor emissions and process parameters by procedures and methods acceptable to the board. Performance tests will include odor, toxic pollutants, dust, and visible emissions testing. Recordkeeping and reporting requirements include notification of startup, shutdown, malfunction, performance tests, monitoring device malfunctions or repairs, monitoring start and end times. Records must be kept for at least 5 years (see Section 9.2.4.6). In North Carolina under 15A NCAC 02D.0600: Monitoring, Recordkeeping, and Reporting, general monitoring, recordkeeping, and reporting requirements are set forth as applicable to sources subject to the requirements of 15A NCAC 02D or 15A NCAC 02Q. The Project will comply with all applicable requirements in this regulation (see Section 9.2.4.7). As discussed in Draft Resource Report 11, Section 11.4.4, the Project will develop a Public Awareness Program as outlined in 49 CFR §192.616, which will provide outreach measures to the affected public, emergency responders, public officials, and excavation businesses.			
R-6	Individual	How is methane detected in air?	Resource Report 11, Section 11.4.11	Methane gas for commercial use is combined with an odorant to help detect leaks. As discussed in Section 11.4.11 of Draft Resource Report 11, the pipeline will be continuously monitored for leaks using the data acquisition system. Operators will use pressures, flows and rate of change alarms to monitor for leaks or other abnormal operating conditions.			
R-7	Multiple Individuals	Noise pollution. Concerned about compressor station noise.	Resource Report 9, Sections 9.3.3.1, 9.3.4.2 and 9.3.5.	The Project evaluated noise effects from the proposed compressor station in Draft Resource Report 9, Sections 9.3.3.1, 9.3.4.2 and 9.3.5.			
R-8	Individual	Noise, lights and land pollution from natural gas production.	NA	The MVP Southgate Project does not involve natural gas production.			
S - Reliability	and Safety		'				
S-1	Roanoke River Basin Association	Level 4 piping standards should be required for the entire pipe length.	NA	See Response to Comment No. J-12			
		In addition to using a minimum of Level 4 standards for all pipe in this project, PHMSA should be required to update their standards to include the FTSB investigations and recommendations of the past 5 years prior to authorizing this project.					
S-2	Multiple Individuals	This proposed pipeline would pose physical dangers to the community and irreparable damage to the environment.	Resource Report 11, Section 11.3	As discussed in Draft Resource Report 11, Section 11.3, the Project is committed to safely operating and maintaining the Project and will instill the existing corporate risk management philosophies of its parent companies to efficiently identify and control or eliminate hazards throughout the life of the pipeline. The Project facilities will fully adhere USDOT Minimum Federal Safety Standards in 49 CFR Part 192. These safety regulations will be reinforced by the comprehensive and strictly enforced practices of the Project.			



Number	Source Name ¹	Issue of Concern	Addressed in Draft Resource Reports	Response
S-3	Multiple Individuals	Danger of leaks and explosion. The pipeline route runs along entire rear perimeter of the Alamance Community College campus. It is sandwiched between the Haw River and the campus property. In the event that an explosion would occur, the safety of a large concentrated number of people could be in jeopardy.	Resource Report 11, Section 11.4.11	Draft Resource Report 11, Section 11.4.11, states that the pipeline will be continuously monitored for leaks using the data acquisition system. Operators will use pressures, flows and rate of change alarms to monitor for leaks or other abnormal operating conditions. In the unlikely case that a shutdown of the pipeline system is needed, the Project's pipeline system will be equipped with remotely controlled sectionalizing block valves to isolate the affected pipeline segment. In some cases, as a result of an emergency shutdown or operational equipment testing, some minor venting may occur at controlled points at either the compressor stations or mainline valves. The Project's Operating Procedures are developed, tested and continuously improved to protect the employees performing the work and the local public from any potential health risks.
S-4	Multiple Individuals	HCAs and blast zones. How will people be notified or evacuated? Who will be responsible legally and financially?	Resource Report 11, Section 11.4.4	As discussed in Draft Resource Report 11, Section 11.4.4, the Project will develop a Public Awareness Program as outlined in 49 CFR §192.616, which will provide outreach measures to the affected public, emergency responders, public officials, and excavation businesses. This program will use multi-media channels to engage these core audiences. The Project's objective is to educate the public on how to recognize the presence of pipelines; understand the potential hazards and safe actions they should take; recognize and report abnormal conditions; and encourage the safe behavior of calling for buried facility location before digging. The Project operator will be held liable for accidents.
S-5	Multiple Individuals	Risks of accidents and spills.	NA	The Project will develop a Project –specific Spill Prevention Control and Countermeasure Plan that will be included in final Resource Report 2 with the Certificate application expected to be filed in November 2018.
S-6	Multiple Individuals	Proximity of Martin Marietta rock quarry and the pipe exploding due to blasting at the quarry.	Resource Report 6, Section 6.4 Resource Report 11, Section 11.4.10	The Martin Marietta – East Alamance Quarry is approximately 0.1 mile east of MP 66.3 of the pipeline. As discussed in Section 6.4 of Draft Resource Report 6, the Solite Quarry straddles the North Carolina-Virginia border approximately two miles west of Project alignment at MP 26.3. One crushed stone operation was identified on the parcel associated with the Russel Compressor Station in Rockingham County, North Carolina. The operation is located approximately 600 feet northwest of the compressor station site. Draft Resource Report 11, Section 11.4.10 states that the Project's pipeline system will include many equipment features that are designed to increase the overall safety of the system and protect the public from a potential failure of the system due to accidents or natural disasters. The Project's pipeline, including depth of cover, will be installed according to PHMSA 49 CFR Part 192 requirements.
S-7	Multiple Individuals	Concerned about safety as it relates to parallels to electric transmission lines.	NA	It is not uncommon for natural gas pipeline facilities to parallel existing utility right-of-ways, including electric transmissions right-of-ways. The Project will comply with all federal, state, and local regulations applying to construction with regard to structures and underground utilities. As part of the Project's assessment of the reliability and safety of constructing and maintaining its proposed pipeline in proximity to overhead facilities, it considered items such as use of heavy construction equipment in the vicinity of high voltage powerlines; potential structural impacts to electric transmission towers due to nearby blasting, if required; effects on the pipeline resulting from lighting strikes to the electric transmission towers; and effects on the pipeline resulting from a direct ground fault current by a nearby high voltage transmission line.
S-8	Multiple Individuals	Rockingham County, NC does not have the resources to deal with a pipeline incident. Who will pay for training of first responders to deal with pipeline incidents?	Resourced Report 11, Sections 11.4.3 and 11.4.8	Emergency response in general is discussed in Section 11.4.3 of Draft Resourced Report 11 and liaison procedures with local authorities are covered in Section 11.4.8 of Draft Resource Report 11.
T - Cumulativ	re Impacts			
T-1	North Carolina Department of Environmental Quality	The Department recommends that the FERC evaluate the Project in conjunction with its consideration of any other existing or proposed projects within North Carolina or located in this region of the nation.	Resource Report 1, Section 10	In Draft Resource Report 1, Section 10, the Project considered other past, present, and reasonably foreseeable future actions in the Project area. These projects are listed in Table 1.10-1 and shown in Figure 1.10-1. A full analysis of potential cumulative impact on resources within the Project area is presented in Section 1.10.1.
T-2	North Carolina Department of Environmental Quality	The cumulative impacts analysis should include potential secondary and cumulative impacts (e.g. from anticipated development resulting from the construction of the pipeline). This analysis should be for both past and reasonably anticipated future impacts, including expansion of the pipeline Project beyond the current proposed terminus near Graham in Alamance County.	Resource Report 1, Section 10	See Response to Comment No. T-1.
T-3	Appalachian Mountain Advocates	FERC must analyze the MVP Southgate Project as a Connected Action to the Mountain Valley Pipeline Mainline and consider those Projects' cumulative impacts together in a single EIS.	Resource Report 1, Section 10	The Project included the Mountain Valley Pipeline Project Mainline in its cumulative impact analysis in Section 1.10 of Draft Resource Report 1.
T-4	Roanoke River Basin Association	Cumulative impacts should show that public costs of each new pipeline are added to costs of existing pipelines, while the public benefits of each new pipeline diminish relative to the benefits of existing pipelines.	Resource Report 1, Section 1.10	The Project has conducted a cumulative impact analysis in accordance with the applicable NEPA regulations and FERC's requirements.
T-5	Blue Ridge Environmental Defense League	Cumulative impacts to areas affected by the February 2014 Duke Energy coal ash need to be properly considered. The Dan River and affected waterways have not recovered from the Duke Energy disaster. Any disturbance of settled toxins can have detrimental impacts to the waterways and water life.	NA	Cumulative impacts to the area affected by the February 2014 Duke Energy coal ash will be provided in in final Resource Report 1 included with the Certificate application expected to be filed in November 2018. The Project will cross the Dan River using the HDD method and therefore avoid direct impacts to the waterway. BMPs will be implemented during construction to control soil erosion and sedimentation down gradient of this area. With the implementation of BMPs, no additional impairment to designated waterbodies in the Project area is anticipated.



List of Acronyms and Abbreviations

BMPs best management practices

DNH Department of Natural Heritage

E&SCP Erosion and Sediment Control Plan

EIS Environmental Impact Statement

FERC Federal Energy Regulatory Commission

HDD horizontal directional drill

INGAA Interstate Natural Gas Association of America

MP milepost

NC HPO North Carolina Historic Preservation Office

NCWRC North Carolina Wildlife Resources Commission

NEPA National Environmental Policy Act

NOI Notice of Intent to Prepare an Environmental Impact Statement

NRHP National Register of Historic Places

PHMSA Pipeline and Hazardous Materials Safety Administration

Plan FERC's Upland Erosion Control, Revegetation, and Maintenance Plan

Procedures FERC's Wetland and Waterbody Construction and Mitigation Procedures

PSNC Energy, a wholly-owned subsidiary of SCANA Corporation

Transco Transcontinental Gas Pipe Line Company, LLC

USDOT U.S. Department of Transportation

USFWS U.S. Fish and Wildlife

VA DHR Virginia Department of Historic Resources

VDCR Virginia Department of Conservation and Recreation

VDGIF Virginia Department of Game and Inland Fisheries