

**Mountain Valley Pipeline, LLC
MVP Southgate Project
Docket No. CP19-14-000**

**Post-Application Environmental Information Request #4
Dated October 3, 2019**

Federal Energy Regulatory Commission

Request:

General

1. Provide responses to all Virginia Department of Environmental Quality (VADEQ) recommendations and comments submitted to the FERC docket on September 11, 2019 (accession number - 20190911-5102).

Response Submitted October 18, 2019:

The Project will file its response to the Virginia Department of Environmental Quality recommendations and comments on October 21, 2019. These responses will also be submitted with the Project's Supplemental Filing to be filed October 2019.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
Phone Number: 713-374-1599

**Mountain Valley Pipeline, LLC
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Request:

General

2. Provide responses to all North Carolina Department of Environmental Quality (NCDEQ) comments submitted to the FERC docket on September 16, 2019 (accession number – 20190916-5167).

Response Submitted October 18, 2019:

The Project will file its response to the North Carolina Department of Environmental Quality comments on October 21, 2019. These response will also be submitted with the Project's Supplemental Filing to be filed October 2019.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
Phone Number: 713-374-1599

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3. Provide responses to all U.S. Environmental Protection Agency (EPA) comments submitted to the FERC docket on September 13, 2019 (accession number – 20190913-5090).

Response Submitted October 18, 2019:

The Project will file its response to the U.S. Environmental Protection Agency comments on October 21, 2019. These response will also be submitted with the Project's Supplemental Filing to be filed October 2019.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
Phone Number: 713-374-1599

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Request:

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4. Provide responses to all North Carolina Wildlife Resources Commission (NCWRC) recommendations and comments submitted to the FERC docket on September 16, 2019 (accession number - 20190916-5189).

Response Submitted October 18, 2019:

The Project will file its response to the North Carolina Wildlife Resources Commission recommendation and comments on October 21, 2019. These response will also be submitted with the Project's Supplemental Filing to be filed October 2019.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
Phone Number: 713-374-1599

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5. Provide an update on remaining biological, cultural, water resources (e.g., water wells, springs), and species-specific surveys. Provide details outlining the specific reasons why surveys have not been completed to date; and provide a schedule for completion of all outstanding surveys.

Response Submitted October 18, 2019:

Updated biological (including springs) and cultural survey progress with justifications for outstanding surveys are included in Attachment 5-1. Updated species-specific survey locations and status are also included in this attachment. Surveys are ongoing as re-routes are incorporated into the Project alignment and as survey permission is granted in these and previously no-access areas. The Project conducted surveys through August 24, 2019 and anticipates resuming surveys on properties where access has been granted since August 2019 in November 2019. Civil surveys for wells are being conducted concurrently with biological surveys as access permission is granted in re-route locations and previously no-access areas. The Project provide final well locations with the Project's Implementation Plan.

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6. Based upon landowner concerns, provide a feasibility assessment for relocating or constructing the Southgate Project (Project) without the use of access roads TA-PI-049 (Taylor; accession number 20190923-4001), TA-PI-007 and TA-PI-008 (Whitehead; accession number 20190916-5190), and TA-AL-193 (Dyer; accession number 20190923-4002).

Response Submitted October 18, 2019:

The Project has reviewed the feasibility of relocating or constructing the Southgate Project without the access roads denoted by FERC:

The Project has reviewed the location of TA-PI-049 along with the comments from the landowner. Although TA-PI-049 provides good access to the right-of-way, the Project understands the challenging logistics related to the single home residence and apartment complex and therefore agrees to eliminate the access road from the project footprint. Due to the timing of the Environmental Information Request and the Project's October 2019 Supplemental Filing, the elimination of the access road will not be reflected in the alignment sheets. Revised alignment sheets will be filed as part of the Project's Implementation Plan.

TA-PI-007 and TI-PI-08 are critical for safe and efficient construction of the Highway 29 and Bannister River crossings. Additionally, TA-PI-007 and TA-PI-008 do not impact the Whitehead property; rather a neighboring landowner that has agreed to a pipeline easement and use of the temporary access roads. Respectfully, in Mrs. Whitehead's September 2019 comments, she would appear to be describing TA-PI-009 and ATWS 1048 which impacted their Siviculture/Pine Plantation, and therefore were eliminated from the Project footprint in the May 2019 Supplemental Filing.

TA-AL-193 is critical to safe and efficient construction in this area due to multiple stream crossings adjacent to the Haw River. Additionally, topography just south of where the access roads enter the right-of-way begins to change elevation. Despite having access at TA-AL-192 approximately 1,200 feet north, the Project would prefer to not eliminate this access road due to landowner sensitivity in this general area along Jimmy Kerr Road. Elimination of either access roads would require the remaining access road to be utilized for all access in the area. With maintaining two points of access, traffic along the access roads can be balanced. Due to topography, residence locations, and environmental features, the access road cannot be relocated.

Name of Respondent: Mr. James Sabol
Title: Project Manager
Phone Number: 412-395-3597

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7. Provide details regarding Mountain Valley's plan to burn brush generated by construction. Indicate whether alternative disposal measures would be available based on land owner request.

Response Submitted October 18, 2019:

Any applicable local/state permits or authorizations will be obtained by the Project prior to burning. No burning will occur where landowners have objected to the activity. Alternative methods will also be used for disposal, such as removal from the project site to an approved disposal location or chipping on the right-of-way. Landowner preferences or requests will be the primary consideration when determining the appropriate disposal method.

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Request:

Resource Report 1 – General Project Description - *Cumulative Impacts*

8. Provide updates to Table 1.10-2 submitted to FERC on May 13, 2019 as part of Attachment 2-1 to the Post-Application EIR #2 (April 23, 2019) response.

Response Submitted October 18, 2019:

See *REVISED Table 1.10-2 - Projects with Potential Cumulative Impacts* in the Project's Supplemental Filing to be filed October 2019.

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Federal Energy Regulatory Commission

Request:

Resource Report 1 – General Project Description - *Cumulative Impacts*

9. Provide a cumulative air quality modeling analysis (using AERMOD or equivalent) for operation of the Lambert Compressor station combined with Transco Compressor Stations 166 and 165 (located 600 feet, and 0.5 miles, respectively, from the Lambert Compressor Station), demonstrating that the cumulative emissions of criteria pollutants do not result in exceedance of the National Ambient Air Quality Standards (NAAQS). Provide all source input parameters (emission rate, stack height, stack temperature, exit velocity, etc.), and justify the basis for any assumptions. Provide a description on how the modeling was performed (for example, identify the specific model number, meteorological data source, terrain data, source parameters, building information, receptor grids, NO₂/NO_x conversion, post-processing assumptions, etc.). You should also provide the input and output files in a form such that staff or staff contractors can reproduce the analysis. Note that recent emissions data for Transco Compressor Station 165 can be found under docket CP18-186, and for Transco Compressor Station 166 under Docket CP13-30 and CP15-118; or may be found by contacting the VADEQ and requesting the permit information for these facilities, which have a single combined permit. The air quality modeling should take into account the proposed upgrades to Transco Station 165 and recent upgrades to Transco Station 166.

Response Submitted October 18, 2019:

A cumulative air quality modeling analysis (using AERMOD or equivalent) for operation of the Lambert Compressor station combined with Transco Compressor Stations 166 and 165 (located 600 feet and 0.5 miles from the Lambert Compressor Station, respectively) will be submitted by early-November to the VADEQ. The analysis will include all source input parameters (emission rate, stack height, stack temperature, exit velocity, etc.), and justified assumptions as well as a description on how the modeling was performed (for example, identify the specific model number, meteorological data source, terrain data, source parameters, building information, receptor grids, NO₂/NO_x conversion, post-processing assumptions, etc.). The input and output files will be provided in a form such that staff or staff contractors can reproduce the analysis will be provided. The modeling was delayed so the Project could adequately take into account the proposed upgrades to Transco Station 165 and recent upgrades to Transco Station 166.

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Request:

Resource Report 1 – General Project Description - *Cumulative Impacts*

10. Provide a cumulative impact noise analysis of the Lambert Compressor Station along with Transco Compressor Stations 165/166 to determine the noise impacts at the noise sensitive areas. Include an analysis that discusses proposed upgrades to Transco Compressor Station 165 as described under docket number CP18-186 and recent upgrades to Transco Compressor Station 166 as described under docket CP15-118. Also provide a copy of the Lambert Compressor Station baseline environmental sound level survey as described in section 9.3.3 of the November 6, 2018 Application.

Response Submitted October 18, 2019:

The upgrades to Transco Compressor Station 166 (CS 166) as presented in docket CP15-118 were completed in late 2017 and the post-construction noise survey was completed on February 22, 2018. The ambient survey for the Southgate Project was conducted on July 17 and 18, 2018, so the modified CS 166 sound level contributions are included in the ambient measurement results and the previously provided noise impact analysis.

The proposed upgrades to Transco Compressor Station 165 (CS 165) as presented in docket CP18-186 were not completed at the time of the July 17 and 18, 2018 ambient sound level measurements, so the cumulative sound level impact of those modifications has not been previously addressed. The sound level predictions presented in the Resource Report 9 and the associated pre-construction noise study for CS 165 have been used to estimate the total cumulative sound level contribution of the equipment at the two NSAs previously analyzed for CS 165.

The residence designated NSA 1 in the CS 165 noise analysis was not included as an NSA in the Southgate Project analysis. The existing noise model of the Lambert CS, developed as part of the Resource Report 9 for the Southgate Project, was used to predict the Project sound level contribution at this NSA. The existing sound levels at this location were taken from the CS 165 noise analysis.

The residence designated as NSA 2 in the CS 165 noise analysis has been purchased by the Project as part of the Southgate Project and is no longer an NSA. The next closest NSA in the same direction as this NSA had been designated NSA 4 in the Southgate Project noise analysis. The CS 165 sound level contribution was estimated at this NSA by using a hemispherical spreading adjustment based on the distance ratios. The original distance to the CS 165 NSA 2 was 1800 feet northwest. The new NSA is about 2500 feet northwest of CS 165. The spreading adjustment used was $20 * \log (1800 / 2500)$ or -2.9 dB. This adjustment was applied to the CS 165 sound level contribution estimate to predict the sound level at the Southgate Project NSA 4. The ambient sound level at the Southgate Project NSA 4 was taken from the pre-construction survey for the Project.

The cumulative analysis for CS 165, CS 166, and Lambert CS is included in the table below.

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Table 10-1: Cumulative Assessment for CS165, CS166, and the Lambert CS							
Southgate Project NSA	CS 165 NSA	Distance and Direction from CS 165 to NSA, feet	Current Sound Level (Incl. CS 165 remaining equipment, CS 166), dBA L_{dn}	Est. Sound Level of New CS 165 Compressor Units, dBA L_{dn}	Est. Sound Level of Lambert CS Equip., dBA L_{dn}	Combined, Lambert CS, CS 165, CS 166, dBA L_{dn}	Potential Cumulative Increase Over Existing Levels, dBA L_{dn}
N/A	1	1150, SE	48.8 (Note 1)	40.4	40.2	49.9	1.1
Project Owned	2	1800, NW	46.6	48.3	No longer an NSA		
4	2 ext.	2500, NW	44.8 (Note 2)	45.4 (Note 3)	39.4 (Note 4)	48.7	3.9
Notes: 1. Taken from the CS 165 RR9. 2. As measured for the Southgate Project. 3. Calculated from the previously reported CS 165 contribution at NSA 2 using a hemispherical spreading factor of $20 * (1800 / 2500)$ or -2.9 dB. 4. Calculated from the noise model for the Southgate Project. Model details are included in the Resource Report 9.							

There was no separate report generated for the baseline environmental sound level survey at the Lambert Compressor Station. All ambient survey reporting was included in the Resource Report 9 for the project. A technical addendum is attached as Attachment 10-1 that includes the graphical presentation of the survey sound level measurement results at the Lambert CS. All other survey information is included in the Resource Report 9 for the Project.

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Request:

Resource Report 2 – Water use and Quality - *Water Resources*

11. Based on comments from the VADEQ (accession number 20190911-5102) and NCDEQ (accession number – 20190916-5167), describe how Mountain Valley would prevent direct contact between uncured or curing concrete and waters of the state; and detail how inadvertent releases of these materials would be managed and disposed of to protect waters of the state. Additionally, describe Mountain Valley's intent to use the soil-drying agent Calciment® (or similar product) as well as intended procedures for storage, handling, and use to avoid or minimize adverse impacts on revegetation and surface waters.

Response Submitted October 18, 2019:

The Project will not actively cure concrete on the right-of-way. The Project's construction team is not likely to use Calciment® unless soil instability issues on the right-of-way needed to be addressed. Should Calciment® be utilized, the Project will implement the MVP Southgate Project *Upland Erosion Control, Revegetation, and Maintenance Plan*, the MVP Southgate Project *Wetland and Waterbody Construction and Mitigation Procedures*, and the Project-specific Erosion and Sediment Control Plan to ensure construction, construction access, and demolition activities will be accomplished in a manner that minimizes construction materials or waste materials from entering surface waters. Wet, excess, or waste concrete will be prohibited from entering surface waters. The Project will also implement its Spill, Prevention, Control, and Countermeasures Plan and Unanticipated Discovery of Contamination Plan to further prevent and mitigate inadvertent impacts to surface waters.

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Request:

Resource Report 2 – Water use and Quality - *Water Resources*

12. Based on Mountain Valley’s comments on the Draft Environmental Impact Statement, filed on September 13, 2019 (accession number 20190913-5134), provide an updated list of water sources to be used for the Project water needs (dust control, hydrostatic testing, and HDD operations). If surface water sources are proposed, provide the intake location and any additional associated workspace; waterbody name; withdrawal rate and method; and measures to minimize entrainment of fish. Address any impacts and mitigation for downstream conditions if water is withdrawn during low flow periods. In addition, discuss how non-municipal water sources would be tested for contamination prior to use.

Response Submitted October 18, 2019:

See *REVISED Table 2.3-7 (Proposed Hydrostatic Test Water Use Summary) and 2.3-8 (Estimated Water Usage for the MVP Southgate Project HDDs)* in the Project’s October 2019 Supplemental Filing to be filed October 22, 2019. See also the Water Withdrawal – Floating Pump Intake with Hose Environmental Typical [Drawing No. MVP-SG-ES63 (NC and VA)] in Attachment 12-1, which include specifications for withdrawal rate and method, and measures to minimize entrainment of fish. These environmental typicals will be included with the construction documents for the contractor(s).

Quantifying volumes of water necessary for dust control requires anticipating the rainfall for the areas during the year of construction. Based on previous project experience, the Project estimates a maximum daily total of 30,000 gallons of water for dust control during dry weather. Watering trucks would spray only enough water to control the dust or to reach the optimum soil moisture content to create a surface crust. Runoff should not be generated during this operation. Water may be obtained through municipal sources or withdrawn from the Dan River (MP 30.1). The Project will register its non-municipal water use as applicable with the North Carolina Department of Environmental Quality, Division of Water Resources. Appropriation of source water volumes would occur periodically as needed to control fugitive dust over the entire construction period. The Project will provide its consultation with the agencies for use of the Dan River with the Project’s Supplemental Filing to be filed October 2019. If the Dan River does not have adequate flow for Project withdrawals, an approved municipal source will be used. If additional workspace is required to withdraw water at the Dan River MP 30.1, the Project will request a variance from FERC for this workspace prior to withdrawal. As previously stated, environmental best management practices will be utilized by the Project to minimize entrainment of fish and aquatic species during surface water withdrawal(s).

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Potential Dust Control Water Sources for the MVP Southgate Project			
County / State	Construction Spread	Milepost	Source
Pittsylvania, VA	1 -H-605 Pipeline	0.0 – 0.5	Municipal or Dan River at MP 30.1
Pittsylvania, VA	1 - H-650 Pipeline	0.0 – 30.4	Municipal or Dan River at MP 30.1
Rockingham and Alamance, NC	2 - H-650 Pipeline	30.4 – 73.2RR	Municipal or Dan River at MP 30.1

Where required by permit conditions, the Project will obtain samples and test non-municipal water sources (i.e., Dan River) prior to withdrawal. The Project will submit reports regarding the volume and quality of the water withdrawn if required by the applicable permits.

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Request:

Resource Report 2 – Water use and Quality - *Water Resources*

13. Address the comments from Appalachian Voices (accession number - 20190917-5010).

Response Submitted October 18, 2019:

The Project is preparing project-specific erosion and sediment control plans based on the FERC Plan and Procedures and the regulatory design requirements of both the Virginia and North Carolina Department of Environmental Quality. These designs are also a visual representation of the MVP Southgate Project *Upland Erosion Control, Revegetation, and Maintenance Plan* and MVP Southgate Project *Wetland and Waterbody Construction and Mitigation Procedures*. Both the Project-specific Erosion and Sediment Control Plan and the MVP Southgate Project *Upland Erosion Control, Revegetation, and Maintenance Plan* and MVP Southgate Project *Wetland and Waterbody Construction and Mitigation Procedures* represent best management practices to prevent sediment from leaving the right-of-way while also allowing stormwater to pass through the controls and exit the right-of-way. Post-construction stormwater plans are also being developed for restoration purposes to ensure permanent stormwater devices are installed to ensure the project limit of disturbance remains stabilized. Both the Project-specific Erosion and Sediment Control Plan and stormwater plans have been submitted for review and approval to the Virginia and North Carolina Department of Environmental Quality.

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Request:

Resource Report 2 – Water use and Quality - *Water Resources*

14. Describe any measures Mountain Valley would implement to minimize or avoid impacts in the event that high water conditions or flooding of the Haw River occurs concurrent with pipeline construction within the floodplain.

Response Submitted October 18, 2019:

The Project is preparing project-specific erosion and sediment control plans based on the FERC Plan and Procedures and the regulatory design requirements of both the Virginia and North Carolina Department of Environmental Quality. Erosion control devices will be monitored and adjusted based on field conditions in areas prone to flooding. The Project will also minimize or avoid impacts that may occur during concurrent construction activity and high water/flood events by monitoring the weather and upstream flood gauges. If flooding is anticipated, equipment will be removed and the right-of-way stabilized as much as practical. The Project will aim to prioritize scheduling to minimize duration of construction activities within designated the Haw River floodplain.

Name of Respondent: Mr. Alex Miller
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Federal Energy Regulatory Commission

Request:

Resource Report 3 – Fish, Wildlife, and Vegetation - *Vegetation*

15. The EPA (accession number 20190913-5090), Virginia Departments of Game and Inland Fisheries (VADGIF; accession number 20190911-5102), Conservation and Recreation (VADCR; accession number 20190911-5102), and Forestry (VADOF; accession number 20190911-5102), and NCWRC (accession number 20190916-5189) have filed comments requesting additional information regarding impacts of the Project on forested land and additional mitigation for Project impacts on interior forest in particular; per their recommendations, provide the following:
- a. table showing the acreage of forested blocks (large areas of uninterrupted forest) affected by the pipeline and the amount of interior forest and forest edge affected in each block (include the milepost closest to each forested block and whether the pipeline route would be collocated with an existing right-of-way at that location);
 - b. indicate whether or not Mountain Valley would provide mitigation beyond collocation to offset the lost acreage of interior forest;
 - c. the plan Mountain Valley proposes for 15.b. above; and
 - d. whether Mountain Valley would follow the recommended mitigation for impacts on Virginia's forests as submitted by the Virginia Forest Conservation Partnership on August 9, 2019 (accession number 20190809-5084).

Response Submitted October 18, 2019:

- a. Table 15-1 Acreage of Forest Interior and Forest Edge by Co-located Segments along the Project Pipeline Alignment is provided in Attachment 15-1.
- b. The Project team met at VADCR headquarters with the Natural Heritage Director and other VADCR staff to discuss their comments on the FERC's Draft Environmental Impact Statement. The Project reaffirmed their commitment made to the Secretary earlier in the year that the Project will coordinate with Virginia for impacts to core forest habitat.
- c. The Project will continue to coordinate with the VADCR on mitigation prior to clearing trees.
- d. The Project is committed to minimizing impacts on forest land and will continue to work with the Virginia Forest Conservation Partnership.

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Request:

Resource Report 3 – Fish, Wildlife, and Vegetation - *Vegetation*

16. As requested by VADCR (accession number 20190911-5102), and the NCWRC (accession number 20190916-5189), confirm Mountain Valley’s revised Exotic and Invasive Plant Species and Control Plan will include the following:
- a. all species on the VADCR Invasive Species list, not just the moderately and highly invasive species;
 - b. clarification that right-of-way monitoring during and post-construction would include any exotic or invasive species, (i.e., not just moderately and highly invasive species) and efforts would be made to control invasive species and noxious plants regardless of conditions adjacent to the right-of-way; and
 - c. an invasive species inventory for the project area including species and methods for treating invasive species based on the current VADCR Invasive Species List.

Response Submitted October 18, 2019:

The Exotic and Invasive Plant Species and Control Plan is being updated to include more information regarding methods to control noxious and invasive species and will be provided in the Project’s Supplemental Filing to be filed October 2019. It will incorporate the following items:

- a. Species categorized as low ranking non-native invasive plants, in addition to species ranked as medium, high, and severe.
- b. Commitment to monitor the right-of-way both during construction and for two years post-construction to allow for early detection of all exotic or invasive species infestations or outbreaks, regardless of ranking. If species or colonies of exotic or invasive species are found in numbers substantially greater than those existing prior to construction, the Project will conduct selective spot eradications of those species. This will occur regardless of the conditions adjacent to the right-of-way.
- c. An inventory of non-native invasive species identified along the Project right-of-way, or with potential to occur along the Project right-of-way, is included in Table 1 of the Exotic and Invasive Plant Species and Control Plan. Herbicide treatment types will be determined based on the species requiring control using methods prescribed by the VADCR or the NCNHP, in each respective state; however, actual treatment methods are not included in the revised report, as recent current events regarding herbicide use will likely lead to significant changes in treatment recommendations should herbicide use become necessary.

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Request:

Resource Report 3 – Fish, Wildlife, and Vegetation - *Vegetation*

17. State whether Mountain Valley would follow the recommendations of the VADCR in the VADEQ filing on September 11, 2019 (accession number 20190911-5102) and the NCWRC filing on September 16, 2019 (accession number 20190916-5189) to only conduct maintenance vegetation mowing in the right-of-way between October 15 and April 1.

Response Submitted October 18, 2019:

The Project agrees to follow the recommendation from the agencies to only conduct maintenance vegetation mowing in the right-of-way between October 15 and April 1.

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Resource Report 3 – Fish, Wildlife, and Vegetation - *Vegetation*

18. As requested by VADEQ and NCWRC, provide restoration seeding details such as specific plant species, seeding rates, composition of each species in plant mixes and location and conditions where different seed mixes would be used; include a VADEQ-approved pollinator plant mix for permanent vegetative stabilization; and include descriptions of Mountain Valley's consultations with the relevant federal and/or state regulatory agencies. Also, include any measures in Mountain Valley's revised Exotic and Invasive Plant Species and Control Plan that would protect pollinators, which could include but is not limited to removal of invasive species by more manual or mechanical means rather than chemical (herbicides/pesticides).

Response Submitted October 18, 2019:

The Project continues to work with the various agencies to develop a seed mix that will incorporate both native and pollinator species to stabilize the right-of-way quickly and efficiently. Those mixes will be included within Project-specific Erosion and Sediment Control Plan to be reviewed and approved by the North Carolina and Virginia Departments of Environmental Quality. The Exotic and Invasive Plant Species and Control Plan is being updated to include more information regarding methods to control noxious and invasive species and will be provided in the Project's Supplemental Filing to be filed October 2019.

Name of Respondent: Mr. Alex Miller
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Request:

Resource Report 3 – Fish, Wildlife, and Vegetation - *Endangered, Threatened, and Special Concern Species*

19. Provide an update regarding bat portal surveys along the remaining 8 percent of the Project alignment that had previously not been verified by field surveys due to a lack of survey permission.

Response Submitted October 18, 2019:

The Projects Bat Portal Assessment is provided in Attachment 19-1. As of October 2019, approximately 94 percent of survey area in Virginia and 92 percent of survey area in North Carolina are complete for bat portal surveys. Although additional surveys have occurred since the last update, percentage complete numbers have remained consistent due to project modifications. In 2019, no suitable bat portals were observed by the Project's survey crews in conjunction with biological survey delineations. No sample points were taken, and no voids identified were determined as suitable for bat use.

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Resource Report 3 – Fish, Wildlife, and Vegetation - *Endangered, Threatened, and Special Concern Species*

20. Provide an update regarding consultation with VADGIF to determine applicable avoidance, minimization or mitigation strategies to minimize impacts on bat species, including the Virginia-endangered tri-colored bat and specifically in the vicinity of the Transco Road Net Conservation site.

Response Submitted October 18, 2019:

To avoid impacts to the Transco Road Net Conservation site, the Project adjusted the limits of disturbance for the project to avoid overlap with the site. Additionally, through consultation with VADGIF, the Project prepared an Incidental Take Plan to outline strategies the Project is committed to in order to minimize potential impacts on the Virginia endangered tri-colored bat. This Plan includes measures recommended by VADGIF to minimize concerns for the tri-colored bat as well as other bat species. The Incidental Take Plan, which summarizes these measures, is included in Attachment 20-1.

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**Mountain Valley Pipeline, LLC
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Docket No. CP19-14-000**

**Post-Application Environmental Information Request #4
Dated October 3, 2019**

Federal Energy Regulatory Commission

Request:

Resource Report 3 – Fish, Wildlife, and Vegetation - *Endangered, Threatened, and Special Concern Species*

21. Provide updated agency consultation regarding whether timing restrictions for tree trimming (e.g., along access roads) will be necessary to protect sensitive or protected species.

Response Submitted October 18, 2019:

The Project met with the U.S. Fish and Wildlife Service on October 9, 2019. The Project will provide notes from this meeting with the Project's Supplemental Filing to be filed October 2019. Based on discussion during this meeting it is the Project's understanding that no timing restrictions for tree trimming will be necessary to protect sensitive or protected species.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
Phone Number: 713-374-1599

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Request:

Resource Report 3 – Fish, Wildlife, and Vegetation - *Endangered, Threatened, and Special Concern Species*

22. Provide results reports and any associated agency correspondence for aquatic species surveys (including freshwater mussels and crayfish) conducted in North Carolina. As requested by U.S. Fish and Wildlife Service in comments filed on September 16, 2019 (accession number 20190916-5160), the reports should contain information regarding what species were found including non-listed species, the habitat conditions, and the dates of the surveys. For aquatic species, streamflow and turbidity information should be included.

Response Submitted October 18, 2019:

North Carolina aquatic species surveys occurred between April 23 and October 7, 2019. All 19 North Carolina crossings scheduled for aquatic surveys based on agency guidance are now complete, and no federally listed species were identified. The Carolina ladle crayfish, which is protected by the NCWRC under the State Endangered Species Act, was observed at 13 crossings. It was the only state-protected species observed during the surveys.

The final North Carolina species report will be provided in the Project's Supplemental Filing to be filed October 2019 and will contain information regarding all species identified during surveys (including non-listed species), habitat conditions and survey dates as well as streamflow and turbidity information.

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Request:

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23. Provide results of surveys and any associated agency correspondence for small whorled pogonia, smooth coneflower, American blueheart, downy phlox, and Piedmont Barbara's-button for which Mountain Valley planned to conduct surveys during the summer of 2019.

Response Submitted October 18, 2019:

In 2019, the Project continued surveys in North Carolina for federally listed Threatened and Endangered plant species along the Project route in Rockingham and Alamance counties. Surveys for the federally Threatened small whorled pogonia (*Isotria medeoloides*) and federally Endangered smooth coneflower (*Echinaceae laevigata*) were completed between June 17 and October 3, 2019. Field surveys analyzed the suitability of areas previously identified as potential habitat based on desktop assessment. Where suitable habitat was found, it was classified as “low,” “medium,” or “high” suitability based on observations of the surveying botanists. No populations of federally listed species were identified during survey efforts. Although low suitability habitat was identified for small whorled pogonia, no habitat was identified for smooth coneflower.

Survey was also completed in Virginia for three plants from the Rare Vascular Plant List - American bluehearts (*Buchnera Americana*), downy phlox (*Phlox pilosa*), and Piedmont Barbara's-buttons (*Marshallia obovata*). Surveys were completed between June 1 and June 15, 2019. Similar to the North Carolina surveys, survey areas were defined by desktop assessment, then observed and classified categorically in the field. Although some areas were identified as low suitability habitat for target species, none of the three target species were observed during surveys.

The *Habitat Assessments and Surveys for Rare Plants along the Mountain Valley Pipeline (MVP) Southgate Project in Virginia* report is included in Attachment 23-1. A full 2019 addendum report for the NC plant surveys will be provided in the Project's Supplemental Filing to be filed October 2019.

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Request:

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24. Provide updated consultation with the NCWRC and VADGIF regarding potential Project impacts on four-toed and mole salamanders, the necessity of surveys for these species, and/or any minimization or mitigation strategies Mountain Valley could implement to minimize impacts on the species.

Response Submitted October 18, 2019:

The Project conducted a desktop habitat assessment in Rockingham and Alamance counties, North Carolina for the four-toed salamander and the mole salamander, which are both protected by the NCWRC under the provisions of Article 25 as North Carolina Special Species of Concern. This study assessed wetland, stream, and pond features identified within the proposed Project corridor during aquatic resource surveys to determine the potential presence of breeding habitat for each species. This assessment was submitted to NCWRC and is included in Attachment 24-1. Upon NCWRC's review of the desktop habitat assessment, the Project will continue to consult with NCWRC on these salamander species.

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Request:

Resource Report 8 – Land Use, Recreation, and Visual Resources - *Land Use*

25. Due to changes in the route since the issuance of the Draft Environmental Impact Statement in July 2019, file an updated table of residences within 50 feet of the Project and site-specific plans for residences within 25 feet of construction.

Response Submitted October 18, 2019:

REVISED - Table 8-D - Structures within 50 Feet of the Southgate Project and Revised Residential Site-specific Drawings will be provided in the Project's Supplemental Filing to be filed October 2019.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
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Request:

Resource Report 4 – Cultural Resources

26. Address the comments of the Monacan Nation (accession No. 20190212-5108) on Mountain Valley’s draft Unanticipated Discovery Plan.

Response Submitted October 18, 2019:

In comments to the FERC dated February 20, 2019 (accession No. 20190212-5108), the Monacan Indian Nation (represented by Cultural Heritage Partners) stated:

“C. The Nation Renews its Requests for Broader Siouan Consultation and Research.

1. Unanticipated Finds Plans Should Recognize Siouan and Monacan Association with this Area.

This entire project is being constructed in an area associated clearly with Eastern Siouan tribes, especially during later prehistory. As the federally-recognized Eastern Siouan tribe whose ancestral and modern territory is most impacted by this project, the Nation must be consulted on draft Burial Permits and the Unanticipated Finds Plans/Post-Review Discovery Plan. The Nation requests a copy of the draft Unanticipated Finds Plan when it is sent to the State Historic Preservation Offices for comment. The Nation should be listed as the appropriate tribe for repatriation of all Woodland Period remains recovered from this project and the Nation should be notified of any human remains discovery on the project. The Nation is the only federally-recognized tribe with a strong claim to prehistoric human remains from the project area that are Siouan in association. We ask that project planning reflect the Nation’s close association with this area and provide for the Nation to re-inter remains associated with the tribe. We understand that NAGPRA may not apply to aspects of this project, so we ask that there be procedures included in the Unanticipated Finds Plan/Post-Review Discovery Plan to govern how competing claims by tribes will be assessed and adjudicated.”

The following bullets identify the specific requests:

- 1. The Nation must be consulted on the Unanticipated Finds Plans.**
- 2. The Nation requests a copy of the draft Unanticipated Finds Plan.**

Response to Requests 1 and 2 – On November 6, 2018, the Project notified all tribes that are known to have interest in the area of the Project (including the Monacan Indian Nation) that MVP Southgate had filed an application with the Federal Energy Regulatory Commission (FERC) for the Project. The notice included a link to the FERC elibrary where copies of the application and the associated Environmental Report could be found for review. These files included Appendix 4-C – Unanticipated Discoveries Plan. Several tribes, including the Monacan Indian Nation, requested consultation and, subsequent to the filing, were provided the opportunity to comment on any and all submitted information. The Unanticipated Discoveries Plan is also referenced in the Draft Environmental Impact Statement, Section 4.10.4. The tribes were notified that the FERC’s Draft Environmental Impact Statement was available for review and were sent, via UPS Overnight, a flash drive containing a copy of the FERC’s Draft Environmental Impact Statement on August 7, 2019.

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- 3. The Nation should be listed as the appropriate tribe for repatriation of all Woodland Period remains recovered from this project.**
- 4. The Nation should be notified of any human remains discovery on the project.**
- 5. The Nation asks that project planning reflect the Nation’s close association with this area and provide for the Nation to re-inter remains associated with the tribe.**
- 6. Should NAGPRA not apply to the project, the Nation asks that there be procedures included in the UFP to govern how competing claims by tribes will be assessed and adjudicated.**

Response to Requests 3 through 6 – In accordance with the Unanticipated Discoveries Plan, the Project will notify all “Interested Tribes,” unless otherwise instructed by the appropriate federal agency, of the determination that a discovery has been made of a newly identified archaeological site or represents information that would alter the current understanding of a previously known and cleared archaeological resource. The “Interested Tribes” would be those tribes that have requested consultation during the FERC review process. All Interested Tribes, unless otherwise instructed by the appropriate federal agency, will be consulted and included in the review of an archaeological treatment plan that will be submitted to the FERC by the Project. Once authorized by FERC, the Project will implement the treatment plan.

In the case of the unanticipated discovery of human remains or funerary objects, the discovery will be treated in a manner guided by the ACHP’s *Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects* (2007) and by the relevant state laws and guidelines. If the find is determined not to be a criminal matter and is determined to be Native American, the Project will contact FERC, the appropriate State Historic Preservation Officer (“SHPO”), and all of the Interested Tribes, unless otherwise instructed by the appropriate federal agency, to develop a plan of action. Should the Project be certificated by FERC, the Project will implement the treatment plan during construction and operation of the facilities.

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Request:

Resource Report 4 – Cultural Resources

27. Provide the results of cultural resources surveys for the unsurveyed 7 miles of pipeline route and 3 miles of access roads.

Response Submitted October 18, 2019:

The Project will file the following additional cultural resource survey reports and associated comment letters in its Supplemental Filing to be filed October 2019:

- Virginia Archaeology Phase I Addendum 1 (draft)
- Virginia Historic Architecture Phase I (revised)
- Virginia Historic Architecture Phase I Addendum 1 (draft)
- North Carolina Archaeology Phase I Addendum 1 (final)
- North Carolina Archaeology Phase I Addendum 2 (final)
- North Carolina Archaeology Phase I Addendum 3 (draft)
- North Carolina Historic Architecture Phase I (revised)
- North Carolina Historic Architecture Addendum 1 (draft and revised)
- North Carolina Historic Architecture Addendum 2 (draft)

Additional survey reports will be provided to the applicable SHPOs and the FERC as they are completed.

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Phone Number: 713-374-1599

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Request:

Resource Report 4 – Cultural Resources

28. Identify the “secondary historic site” that Mr. Joyner (accession No. 20190923-4001) contends is zero feet from the pipeline. Verify if this is the same site as “Mountain View” a 1790s house on Route 29, also zero feet from the pipeline, according to Mr. Joyner. In addition, provide information about the “old home site” near the proposed compression station, mentioned by Mr. Joyner. If these sites are within the area of potential effects (APE), file the results of recordation and evaluation.

Response Submitted October 18, 2019:

In the recorded comments (accession No 20190923-4001), Mr. Mark Joyner (President of the Danville Historical Society) stated:

“But we also have a secondary historic site. Other than Little Cherrystone, which is zero feet in distance away from the pipeline, we have Mountain View is another historic, 1790s home, finished and completed in 1840, and that's also in the Chatham District on Route 29, zero distance. So it's gonna affect both of these. ... The 155 acres that was purchased back here, there is also an additional old home site, there is an additional home site sitting right back in here....”

The “secondary historic site” referenced by Mr. Joyner is Mountain View (071-0025), which is believed to have been constructed ca. 1840–1842 and is listed on the National Register of Historic Places under Criterion C (architecture). This 164.27-acre property is situated approximately 65 feet from the nearest Project workspace and is described in detail in Addendum 1 to the Virginia Historical Architectural Report in the Project’s Supplemental Filing to be filed October 2019. The Project is preparing an effects report for this property, which will be submitted to the Virginia SHPO and the FERC upon completion.

The Project’s archaeological surveys of the proposed Lambert Compressor Station site identified three archaeological sites (44PY0456, 44PY0459, and 44PY0460), one of which (44PY0456) includes a historic period artifact scatter. None of the three sites were determined eligible for the National Register of Historic Places by the Virginia SHPO, and no further testing was required. The results of the compressor station surveys and the Virginia SHPOs comments have been previously filed with the FERC.

Name of Respondent: Mr. Alex Miller
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Request:

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29. Document that Mountain Valley has communicated with the Danville, Virginia Historical Society. Also document that copies of all cultural resources investigation reports for Pittsylvania County, Virginia were conveyed to the Danville Historical Society (provided they sign a confidentiality agreement with Mountain Valley to keep cultural resources data privileged and not release data to the public), with a request for their review and comments. File with the FERC copies of all correspondence to and from the Danville Historical Society.

Response Submitted October 18, 2019:

The Project contacted the Danville Historical Society on October 4, 2019. The Project has provided the Danville Historical Society with a confidentiality agreement and will provide them with copies of all cultural resources investigation reports for Pittsylvania County, Virginia, with a request for comment, once that agreement is executed.

Name of Respondent: Mr. Alex Miller
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Request:

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30. Document that Mountain Valley has communicated with Preservation Virginia. Also document that copies of cultural resources investigation reports for Pittsylvania County, Virginia were conveyed to Preservation Virginia (provided they sign a confidentiality agreement with Mountain Valley to keep cultural resources data privileged and not release data to the public), with a request for their review and comments. File with the FERC copies of all correspondence to and from Preservation Virginia.

Response Submitted October 18, 2019:

The Project provided Preservation Virginia with a confidentiality agreement on August 27, 2019, and Preservation Virginia returned the signed agreement on August 28, 2019. The Project provided Preservation Virginia with copies of all cultural resources investigation reports completed to date for Pittsylvania County, Virginia on September 10, 2019 and will provide additional reports as they become available.

Name of Respondent: Mr. Alex Miller
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Request:

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31. Verify if the church and cemetery mentioned by Aimee Tillery (accession No. 20190923-4000) is the same as the “Deep Creek Primitive Baptist Church and Cemetery/Site 31AM443” recorded by TRC in North Carolina (Karpynec et al., 2018b). If not, provide information on the church and cemetery mentioned by Aimee Tillery.

Response Submitted October 18, 2019:

In the portion of her recorded comments (accession No. 20190923-4000) relating to cultural resources, Ms. Aimee Tilley (who is a partial owner of a property on High Rock Road in Reidsville in Rockingham County) stated:

“And then on the other side of us is a church cemetery. I don’t think they would be anywhere near that, but we want to make sure that that’s in the notes that there is a cemetery very close to where they’re going to be. That church is aware of what’s going on. They’re not particularly happy about it. ... Their property has a pretty good slope to it in the cemetery so if things further up the line caused erosion problems or water to flow different ways it could cause problems for their cemetery. And we are alert to that being that we are their neighbor and this could affect them, too.”

The church and cemetery referenced by Ms. Tilley are Garretts Grove United Methodist Church and cemetery, which are located approximately 740 feet east of the Project corridor along High Rock Road at approximate MP 49.5. Deep Creek Primitive Baptist Church and Cemetery (Site 31AM443) are situated over 15 miles to the southeast at approximate MP 65.1RR.

The present Garretts Grove church building was constructed in 1992 and occupies an 8.26-acre parcel that also contains a modern storage building, picnic shelter, and bath/shower building. The adjacent cemetery contains approximately 250 graves dating between 1915 and the present. The church complex was not recorded as a historic architectural resource due to its recent age, and the cemetery was not recorded as an archaeological site due to its distance from the direct effects Area of Potential Effects.

Name of Respondent: Mr. Alex Miller
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32. Verify the location of the undocumented graves in Ossipee in Altamahaw, identified by Crystal Cavalier (accession No. 20190923-4002), who claims to be a member of the Occaneechi Band of the Saponi Nation. If these graves are within the APE, file the results of recordation and evaluation. Also, file with the FERC copies of all correspondence to and from the Occaneechi Band of the Saponi Nation. Verify if the tribe considers clams to be a traditionally used resource, as claimed by Ms. Cavalier.

Response Submitted October 18, 2019:

In the portion of her recorded comments (accession No. 20190923-4002) relating to cultural resources, Ms. Crystal Cavalier (who stated that she is a member of the Occaneechi Band of the Saponi Nation) stated:

“And my concern for this is that there is undocumented graves in Ossipee, in Altamahaw, especially where the pipeline is going. Now, I do have a couple of maps where Alamance County has -- they did a report for it but it's just basically stories that were passed down, like oral tradition that's been passed down. And so, we would have to go out to the land and try to see them, but I do know after reading MVP's – their report, that they did not consult all tribal members, they just consulted the Tribal Council, which is the Chief and the Tribal Council, but they didn't consult the people who live there.... Another thing that I see is there's a lot of wetlands that they're crossing, and there's a lot of clams that's going to be impacted by it. And I know you guys are probably like clams -- but clams are real important to my people. We use them as jewelry, we use them in hunting, in things like that, especially in traditional.”

The Project has coordinated with the Occaneechi Band of the Saponi Indians, other interested Tribes, and the North Carolina Commission on Indian Affairs regarding the Project, and individual members of those tribes and other members of the public have been provided an opportunity to comment on potential Project-related effects on cultural resources. The Project has also spoken with Mr. Tony Hayes, Occaneechi Band of the Saponi Nation Chairman, in regards to any previously undocumented graves. There are none to his knowledge within the Project Area of Potential Effects, however, we will discuss with the tribe's subject matter expert to confirm.

The Project is also conducting systematic background research and archaeological surveys of all workspace areas to identify archaeological sites, cemeteries, burial grounds, or other human graves in accordance with FERC and North Carolina and Virginia SHPO regulations. The Project has implemented several pipeline alignment and workspace modifications to avoid impacts to known cemeteries, burial grounds, or human graves. The Project is unaware of any undocumented graves within the Project direct Area of Potential Effects in Ossipee, Altamahaw, or elsewhere along the Project corridor.

In the event that any previously unknown cemeteries, burial grounds, or human graves are encountered during construction, they will be treated respectfully and in accordance with the Project's approved Unanticipated Discoveries Plan.

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The Project acknowledges that clams (freshwater mussels) have traditionally been used as tools, in jewelry, and as food resources by the Occaneechi Band of the Saponi Indians and by other Eastern Siouan tribes. The Project conducted systematic aquatic surveys for mussels in streams to be crossed by the Project and will implement measures to protect mussels and other surface water resources during construction, including relocating mussels from the construction areas, reducing sediment loads, restoring stream habitat, and restoring riparian strips along streams in accordance with federal and state regulatory requirements.

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Request:

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33. Respond to comments provided by Jason Crazy Bear Tircuit Keck (accession No. 20190923-4002).

Response Submitted October 18, 2019:

In the portion of his comments (accession No. 20190923-4002) relating to cultural resources, Mr. Jason Crazy Bear Tircuit Keck (who stated that he has married into the Occaneechi Saponi tribe) stated:

“I want to see plans and words and actions just like the stuff that they have to do which is those impact reports. I want to see them come in a way that their predecessors have not had the integrity to do. I want them to show my people, so when we're coming up against them in an adversarial way professionally, that we've done our homework, we're looking out for your people. We found where the burial grounds are, we're not going to the burial grounds. Oh, the Haw River is a sacred river to your people, you've been praying by it for hundreds of years, okay maybe we'll go this way out of the river's pathway. Maybe we won't.”

The Project is conducting systematic background research and archaeological surveys of all Project workspace areas to identify archaeological sites, cemeteries, burial grounds, or other human graves in accordance with FERC and North Carolina and Virginia SHPO regulations. The Project has implemented several pipeline alignment and workspace modifications to avoid impacts to known cemeteries, burial grounds, or human graves. In the event that any previously unknown cemeteries, burial grounds, or human graves are encountered during construction, they will be treated respectfully and in accordance with the Project's Unanticipated Discoveries Plan. Copies of all Project archaeological reports for North Carolina and the Unanticipated Discoveries Plan have been provided to the Occaneechi Band of the Saponi Nation for review and comment.

As documented in the FERC's Draft Environmental Impact Statement and in other publicly available Project-related filings, the Southgate Project does not cross the Haw River with the current alignment.

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Request:

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34. Document if the “Indian mound” reported by Robert Wiltaskens, of Dry Fork, Virginia (accession No. 20190906-3055), is within the APE. If it is, provide the results of recordation and evaluation.

Response Submitted October 18, 2019:

In a reference to the Robert Pollok-Hill Farms Variation in Pittsylvania County, Virginia, Mr. Wiltaskens (accession No. 20190906-3055) stated:

“The Report leaves out a house that would need to be moved and a Indian mound that would be in the way a spring that would be need to be crossed (Figure 3.4.9, Figure 10.6-114. MVP has developed this change without checking the property or talking with the property owner.”

The Robert Pollok-Hill Farms Variation is located between MPs 14.7 and 15.7 in Pittsylvania County, Virginia (See *REVISED Table 10.6-1 Comparison of the Current Route (September 2019) and Robert Pollok-Hill View Farms Variation* in the Project’s Supplemental Filing to be filed October 2019). The Virginia SHPO archaeological sites database does not contain any information pertaining to known “Indian mounds” within this property that would be potentially affected by this variation.

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35. File a copy of the review by the North Carolina State Historic Preservation (SHPO) of the North Carolina Historic Architecture Addendum 1 Survey Report (Karpynek 2019) produced for Mountain Valley.

Response Submitted October 18, 2019:

The Project will provide the North Carolina SHPO comment letter on the Historic Architecture Addendum 1 Survey Report and other cultural resources correspondence received since May 15, 2019 in the Project's Supplemental Filing to be filed October 2019.

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Request:

Resource Report 4 – Cultural Resources

36. File avoidance or testing plans for archaeological sites 44PY270, 44PY281, 44PY358, 44PY447, 44PY452, and 44PY454, and historic architectural sites Norfolk Southern Railroad/Site 5598, Farm/Site 71-5217, and Giles Log House/Site 5222 in Virginia; and archaeological sites 31AM414, 31AM441, 31AaM442, 31RK44, 31RK97, 31RK217, 31RK229, 31RK230, and 31RK239 in North Carolina.

Response Submitted October 18, 2019:

The Project submitted avoidance (preservation) plans for archaeological sites 44PY281, 44PY358, 44PY477, 44PY452, and 44PY454 to the Virginia SHPO in October 2019, and copies of those plans will be filed in the Project's Supplemental Filing to be filed October 2019. Archaeological site 44PY270 has recently been tested to determine National Register of Historic Places eligibility, and the results of that testing and an avoidance plan will be provided to the Virginia SHPO in November 2019. Historic architectural sites Norfolk Southern Railroad/Site 071-5598, Farm/Site 71-5217, and Giles Log House/Site 071-5222 in Virginia are eligible for or being treated as eligible for the National Register of Historic Places, and avoidance plans for those properties will be provided to the Virginia SHPO along with effects recommendations in November 2019

The Project submitted avoidance (preservation plans) for archaeological sites 31AM441, 31RK230, and 31RK239 to the North Carolina SHPO in October 2019, and copies of those plans will be filed in the Project's Supplemental Filing to be filed October 2019. Archaeological site 31AM414, 31AM442, and 31RK217 have recently been tested to determine National Register of Historic Places eligibility. A report on that testing will be filed in the Project's Supplemental Filing to be filed October 2019, and avoidance (preservation) plans will be provided to the North Carolina SHPO if necessary once SHPO comments are received. Site 31RK229 will be tested once landowner permission is obtained, and the report will be filed with the North Carolina SHPO and the FERC subsequent completion of testing. The Project is presently evaluating testing and avoidance options for sites 31RK44 and 31RK97, and testing reports or avoidance plans for those sites will be submitted to the SHPO and filed with the FERC upon completion.

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Request:

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37. File avoidance plans for the Belle Grove Church and Cemetery/Site 5033, Wells Cemetery/Site 5226, Wallor Cemetery/Site 5227, Cemetery/Site 5622, Cemetery/Site 5623, and the Gafford Cemetery/Site 71-5525 in Virginia; and the Deep Creek Primitive Baptist Church and Cemetery/Site 31AM443, and Cemetery/Site 31RK316 in North Carolina.

Response Submitted October 18, 2019:

The Project submitted avoidance (preservation) plans for Belle Grove Church and Cemetery/Site 071-5033, Wells Cemetery/Site 071-5226, Cemetery/Site 071-5622, Cemetery/Site 071-5623, and the Gafford Cemetery/Site 071-5525, Deep Creek Primitive Baptist Church and Cemetery/Site 31AM443, and Cemetery/Site 31RK216 (31RK316 is not a Southgate Project site) to the Virginia and North Carolina SHPOs in October 2019, and copies of those plans will be filed in the Project's Supplemental Filing to be filed October 2019. Wallor Cemetery/Site 071-5227 is considered eligible for the National Register of Historic Places, and an avoidance plan for that property will be provided to the Virginia SHPO along with an effects recommendation in November 2019.

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Request:

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38. File the results of additional research at historic sites T.M. Holt Textile Mill/Site AM203, Jim McClure House/Site AM266, Robertson House/Site AM350, Captain Sam Vest House/Site AM447, J.M. Jordan House/Site AM1520, Tabandry Mill/Site 2407, and American Tobacco Company Plant/Site RK1704 in North Carolina, in response to comments from the SHPO.

Response Submitted October 18, 2019:

The Project submitted additional information on historic sites T.M. Holt Textile Mill/Site AM203, Jim McClure House/Site AM266, Robertson House/Site AM350, Captain Sam Vest House/Site AM447, J.M. Jordan House/Site AM1520, Tabardrey Mill/Site 2407, and American Tobacco Company Plant/Site RK1704, to the North Carolina SHPO in revisions to the Phase I Historic Architectural Survey report on April 29, 2019. On July 18, 2019, the North Carolina SHPO concurred with the Project's recommendation that T.M. Holt Textile Mill/Site AM0203, J.M. Jordan House/Site AM1520, Tabardrey Mill/Site AM2407, and American Tobacco Company Plant/Site RK1704 were not eligible for the National Register of Historic Places (NRHP) and that the Southgate Project would not affect either the Jim McClure House/Site AM0266 or the Robertson House/Site AM0350. The additional information submitted to North Carolina SHPO and the subsequent concurrence determination will be filed in the Project's Supplemental Filing to be filed October 2019. The Project is presently preparing a NRHP eligibility assessment of the Captain Sam Vest House/Site AM447, which will be filed with the North Carolina SHPO in October 2019.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
Phone Number: 713-374-1599

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 4 – Cultural Resources

39. File avoidance or treatment plans for archaeological site 44PY449, and historic sites Little Cherrystone/Site 71-36, and Farm/Site 5212 in Virginia; and archaeological site 31RK259 and the historic Granite Mill/Site AM867 in North Carolina.

Response Submitted October 18, 2019:

The Project submitted an avoidance (preservation) plan for 44PY0449 and 31RK259 to the Virginia and North Carolina SHPOs, respectively, in October 2019. Avoidance plans for Little Cherrystone/Site 071-0036 and Farm/Site 071-5212 will be provided to the Virginia SHPO along with an effects recommendation in November 2019. An avoidance plan for Granite Mill will be developed in consultation with the North Carolina SHPO once all eligibility determinations have been completed for Project's historic architectural sites in North Carolina per their request.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
Phone Number: 713-374-1599

**Mountain Valley Pipeline, LLC
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Federal Energy Regulatory Commission

Request:

Resource Report 6 – Geology

40. Provide an update on Mountain Valley's coordination with Martin Marietta Materials regarding The East Alamance Quarry in regard to the quarry's April 25, 2019 permit modification.

Response Submitted October 18, 2019:

The Project has eliminated all expected impacts to the East Alamance Quarry by rerouting the pipeline off of the Martin Marietta-owned properties and providing a significant buffer to the property line. The current pipeline route will be provided in the Project's Supplemental Filing to be filed October 2019. As the Project understands, the quarry's April 25, 2019 permit modification is within the existing permit boundary, which does not change the Project's analysis.

Name of Respondent: Mr. James Sabol
Title: Project Manager
Phone Number: 412-395-3597

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 7 – Soils

41. Discuss the feasibility of following the recommendation in the VADEQ filing on September 11, 2019 (accession number 20190911-5102) that erosion and sedimentation controls should be placed prior to any clearing and grading activities associated with the project.

Response Submitted October 18, 2019:

The Project will file its response to the Virginia Department of Environmental Quality recommendations and comments on October 21, 2019. These responses will also be submitted with the Project's Supplemental Filing to be filed October 2019. These responses will include information on erosion and sedimentation controls.

Name of Respondent: Mr. James Sabol
Title: Project Manager
Phone Number: 412-395-3597

**Mountain Valley Pipeline, LLC
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Federal Energy Regulatory Commission

Request:

Resource Report 7 – Soils

42. Based on NCDEQ comments, verify that imported soils would be certified contaminant free prior to their use on the Project.

Response Submitted October 18, 2019:

Although the Project currently does not anticipate the need for imported soils, the Project will comply with the NCDEQ's regulatory requirements for certifying contaminant-free soils. If importing soils is necessary, the Project would place preference to sources pre-approved by NCDEQ. If those sites are unavailable, the Project would explore alternative sites in consultation with NCDEQ.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
Phone Number: 713-374-1599

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 9 – Air Quality and Noise – *Air Quality*

43. Pursuant to the FERC’s June 11, 2019 EIR item #25, provide any correspondence that has occurred since April 23, 2019 with the VADEQ regarding the Virginia air permit application and its completeness. In addition, provide the revised criteria pollutant and formaldehyde dispersion modeling analyses that was not previously included in Mountain Valley’s response to the April 23, 2019 EIR.

Response Submitted October 18, 2019:

Updated correspondence with the VADEQ, and all other stakeholders, will be supplied in the Project’s Supplemental Filing to be filed October 2019. A revised criteria pollutant and formaldehyde dispersion modeling analysis will be submitted in early-November to the VADEQ.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
Phone Number: 713-374-1599

**Mountain Valley Pipeline, LLC
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Federal Energy Regulatory Commission

Request:

Resource Report 9 – Air Quality and Noise - Noise

44. Pursuant to FERC’s June 11, 2019 EIR item #26, provide an assessment of compliance with the Pittsylvania County Noise Ordinance and provide information regarding recent discussion with county officials. Specifically, provide an assessment of applicability with the Pittsylvania County Noise Ordinance for the following:
- a. 24-hour construction of the Lambert Compressor Station/Interconnect;
 - b. 24-hour construction of Railroad Crossings 1 and 2; and
 - c. Maintenance blowdown at the Lambert Compressor Station.

Response Submitted June 21, 2019:

The Project has completed noise modeling related to activities EIR items 44 a. through c. The Project continues to discuss applicability of the Pittsylvania County Ordinance with county officials.

Response Submitted October 18, 2019:

The Project has completed noise modeling related to activities EIR items 44 a. through c. The Project has met with Pittsylvania County officials and continues to discuss applicability of the Pittsylvania County Ordinance.

Name of Respondent: Mr. Alex Miller
Title: Environmental Manager
Phone Number: 713-374-1599

**Mountain Valley Pipeline, LLC
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Federal Energy Regulatory Commission

Request:

Resource Report 10 – Alternatives

45. Provide an analysis for an alternate route on the Taylor property at MP 19.5, on the east side of Stony Mill Road. Also, provide an analysis for an alternative alignment west of the residence. If proposed access road TA-PI-049 cannot be relocated to a different site, coordinate with the landowner to develop a plan that would avoid or minimize impacts to the driveway for the single-family residence and apartment complex.

Response Submitted October 18, 2019:

The Project evaluated the Taylor East Variation and Taylor West Variation (see below). Additionally, as stated in response to Environmental Information Response #6 above, TA-PI-049, the Project has reviewed the location of TA-PI-049 along with the comments from the landowner and understands the challenging logistics related to the single home residence and apartment complex and therefore agrees to eliminate the access road from the project footprint.

The Taylor East Variation deviates from the current pipeline route at approximate MP 19.2, extends south-southwest, and crosses mostly forested (see Figure 45-1 in Attachment 45-1). It rejoins the current pipeline route at approximate MP 19.6.

As shown in Table 45-1 below, the primary advantages of the Taylor East Variation are:

- crosses four fewer parcels;
- affects less residential land; and
- affects less agricultural land.

The primary disadvantages of the Taylor East Variation are:

- greater length and associated land disturbance;
- crosses more waterbodies; and
- affects more forest land.

There are no potential constructability concerns of the Taylor East Variation.

The Taylor East Variation does not offer a significant environmental advantage over the current pipeline route. Therefore, the Project eliminated this variation from further consideration as its preferred pipeline route.

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Table 45-1			
Comparison of the Current Pipeline Route and Taylor East Variation (MP 19.2 to MP 19.6)			
Feature	Current Pipeline Route	Taylor East Variation	Difference
Total length (miles)	0.4	0.4	0
Construction right-of-way (acres) <u>a/</u>	4.7	5.0	+0.3
Permanent right-of-way (acres) <u>a/</u>	2.3	2.4	+0.1
Total number of parcels crossed	9	5	-4
Number of residences within 25 and 50 feet of the edge of the construction ROW	0/0	0/0	0/0
Residential Land (miles)	0.1	0	-0.1
Commercial/Industrial land (miles)	0	0	0
Unlisted/Potential Eligible Historic Properties (number)	0	0	0
National Trails, Recreation Trails, and Other Recreational Areas (number)	0	0	0
Number of waterbodies crossed	0	2	+2
Number of NWI wetlands crossed	0	0	0
Total NWI wetland crossing length (feet)	0	0	0
NWI wetlands within construction ROW (acres) <u>b/</u>	0	0	0
Agricultural land within construction ROW (acres) <u>c/</u>	2.3	1.9	-0.4
Forest Areas (miles)	0.2	0.2	0
Forested land affected during construction (acres)	2.0	2.4	+0.4
Forested land affected during operation (acres)	1.1	1.2	+0.1
Length parallel or adjacent to existing ROW (miles)	0.2	0	-0.2
<p><u>a/</u> Assuming 100-foot-wide construction ROW and 50-foot-wide permanent ROW. <u>b/</u> Assuming 75-foot-wide construction ROW. <u>c/</u> Includes pasture/hay and cultivated crops. ROW = right-of-way. NWI = National Wetland Inventory <u>Information Sources:</u> GIS – Analysis based on Geodatabase layers and shapefiles. NC Parcel Boundaries and Standard Fields - http://data.nconemap.gov/geoportal/catalog/search/resource/details.page NLCD – 2006 National Land Cover Data - http://www.epa.gov/mrlc/nlcd-2006.html NWI – National Wetlands Inventory - http://www.fws.gov/wetlands/ USGS – U.S. Geological Survey - http://www.usgs.gov/ NHD – National Hydrography Dataset - http://nhd.usgs.gov/ ESRI - GIS Mapping - http://www.esri.com/</p>			

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The Taylor West Variation deviates from the current pipeline route at approximate MP 19.4, extends northwest, southwest, and south and crosses forest and open land (see Figure 45-1 in Attachment 45-1). It rejoins the current pipeline route at approximate MP 19.7.

As shown in Table 45-2 below, the primary advantages of the Taylor West Variation are:

- crosses one fewer parcel.

The primary disadvantages of the Taylor West Variation are:

- greater length and associated land disturbance;
- affects more agricultural land; and
- affects more forest land.

There are no potential constructability concerns of the Taylor West Variation.

The Taylor West Variation does not offer a significant environmental advantage over the current pipeline route. Therefore, the Project eliminated this variation from further consideration as its preferred pipeline route.

Table 45-2			
Comparison of the Current Pipeline Route and Taylor West Variation (MP 19.4 to MP 19.7)			
Feature	Current Pipeline Route	Taylor West Variation	Difference
Total length (miles)	0.3	0.4	+0.1
Construction right-of-way (acres) <u>a/</u>	3.7	4.8	+1.1
Permanent right-of-way (acres) <u>a/</u>	1.8	2.3	+0.5
Total number of parcels crossed	4	3	-1
Number of residences within 25 and 50 feet of the edge of the construction ROW	0/0	0/0	0/0
Residential Land (miles)	0.1	0.1	0
Commercial/Industrial land (miles)	0	0	0
Unlisted/Potential Eligible Historic Properties (number)	0	0	0
National Trails, Recreation Trails, and Other Recreational Areas (number)	0	0	0
Number of waterbodies crossed	0	0	0
Number of NWI wetlands crossed	0	0	0
Total NWI wetland crossing length (feet)	0	0	0
NWI wetlands within construction ROW (acres) <u>b/</u>	0	0	0
Agricultural land within construction ROW (acres) <u>c/</u>	1.1	1.3	+0.2
Forest Areas (miles)	0.2	0.3	+0.1
Forested land affected during construction (acres)	2.6	3.5	+0.9
Forested land affected during operation (acres)	1.4	1.8	+0.4
Length parallel or adjacent to existing ROW (miles)	0.3	0	-0.3

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Table 45-2			
Comparison of the Current Pipeline Route and Taylor West Variation (MP 19.4 to MP 19.7)			
Feature	Current Pipeline Route	Taylor West Variation	Difference
<p>a/ Assuming 100-foot-wide construction ROW and 50-foot-wide permanent ROW. b/ Assuming 75-foot-wide construction ROW. c/ Includes pasture/hay and cultivated crops. ROW = right-of-way. NWI = National Wetland Inventory <u>Information Sources:</u> GIS – Analysis based on Geodatabase layers and shapefiles. NC Parcel Boundaries and Standard Fields - http://data.nconemap.gov/geoportal/catalog/search/resource/details.page NLCD – 2006 National Land Cover Data - http://www.epa.gov/mrlc/nlcd-2006.html NWI – National Wetlands Inventory - http://www.fws.gov/wetlands/ USGS – U.S. Geological Survey - http://www.usgs.gov/ NHD – National Hydrography Dataset - http://nhd.usgs.gov/ ESRI - GIS Mapping - http://www.esri.com/</p>			

Name of Respondent: Mr. James Sabol
Title: Project Manager
Phone Number: 412-395-3597

**Mountain Valley Pipeline, LLC
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**Post-Application Environmental Information Request #4
Dated October 3, 2019**

Federal Energy Regulatory Commission

Request:

Resource Report 10 – Alternatives

46. Respond to comments from Atlantic Coast Pipeline (ACP) submitted on September 16, 2019 (accession number - 20190916-5191) and Williams (accession No: 20190918-5032) submitted on September 17, 2019 regarding the use of their respective infrastructure as System Alternatives.

Response Submitted October 18, 2019:

The Project will file its response to the Atlantic Coast Pipeline and Williams on October 21, 2019. These responses will also be submitted with the Project's Supplemental Filing to be filed October 2019.

Name of Respondent: Mr. James Sabol
Title: Project Manager
Phone Number: 412-395-3597

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 10 – Alternatives

47. Provide an analysis of the route requested by the EPA on September 12, 2019 (accession number 20190913-5090). The route would extend from MP 32.8 and follow the existing Transco pipeline to the intersection with the Cardinal Pipeline. The route would collocate with the Cardinal Pipeline to the delivery point at Haw River.

Response Submitted October 18, 2019:

The Project will file its response to the U.S. Environmental Protection Agency comments on October 21, 2019. These response will also be submitted with the Project's Supplemental Filing to be filed October 2019.

Name of Respondent: Mr. James Sabol
Title: Project Manager
Phone Number: 412-395-3597

**Mountain Valley Pipeline, LLC
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Federal Energy Regulatory Commission

Request:

Resource Report 10 – Alternatives

48. Respond to comments from the City of Burlington submitted on September 16, 2019 (accession number 20190916-5076) regarding an alternate route avoiding city property and reducing potential impacts on public water supplies.

Response Submitted October 18, 2019:

In late 2018, the Project reached out to the City of Burlington and followed up multiple times in an attempt to discuss the city's concerns but received no reply or contact from the city until Mr. Lambert's message on August 5, 2019. The Project received a message from Mr. Todd Lambert of the City of Burlington on August 5, 2019, and replied on the same day with an offer to discuss his concerns. The Project did not receive a reply. The Project has reached out again in October 2019.

The Project evaluated the City of Burlington Alternative submitted on September 16, 2019 (accession number 20190916-5076) between approximate MP 61.4 and MP 64.35 by digitizing the route depicted on a map to the best extent possible. The city's alternative route deviates from the current pipeline route at approximate MP 61.4 and extends east, southeast, and south for approximately 3.1 miles and crosses mixed forested and open/agricultural land, and residential areas (see Figure 48-1 in Attachment 48-1). It rejoins the current pipeline route at approximate MP 64.35.

As shown in Table 48-1, the primary advantages of the City of Burlington Alternative are:

- slightly shorter length and associated land disturbance;
- affect two less waterbodies and wetlands; and
- affect less agricultural land.

The primary disadvantages of the City of Burlington Alternative are:

- affects more parcels of land;
- affects more residential land and residences within 25 and 50 feet of workspace; and
- affects more forest land.

Potential constructability concerns of the City of Burlington Alternative are:

- residential site specific construction plans would be required due to close proximity to structures.

The City of Burlington Alternative would affect more residential land and residences and does not offer a significant environmental advantage over the current pipeline route. Therefore, the Project eliminated this alternative from further consideration as its preferred pipeline route. As described in its November 2018 filing and subsequent filings, the Project is committed to minimizing impacts on waterbodies and drinking water supplies by implementing the MVP Southgate Project *Upland Erosion Control, Revegetation, and Maintenance Plan* and MVP Southgate Project *Wetland and Waterbody Construction and Mitigation Procedures* and the Project-specific Erosion and Sediment Control Plan and Spill Prevention, Control, and Countermeasures Plan. Additionally, the Project reiterates that it will cross Stony Creek using the HDD method, which will avoid impacts on the creek. The Project will continue to coordinate with the City of Burlington to address any further concerns.

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Dated October 3, 2019**

Table 48-1			
Comparison of the Current Route (September 2019) and City of Burlington Alternative (MP 61.4 to MP 64.35)			
Feature	Current Route (September 2019)	City of Burlington Alternative	Difference
Total length (miles)	3.2	3.1	-0.1
Construction right-of-way (acres) <u>a/</u>	39.0	38.3	-0.7
Permanent right-of-way (acres) <u>a/</u>	19.5	19.1	-0.4
Total number of parcels crossed	15	34	+19
Number of residences within 25 and 50 feet of the edge of the construction ROW	0/0	9/14	+9/+14
Environmental Justice Areas (number)	0	0	0
Residential Land (miles)	0	0.73	+0.73
Commercial/Industrial Land (miles)	0	0	0
Unlisted/Potential Eligible Historic Properties (number)	0	0	0
National Trails, Recreation Trails, and Other Recreational Areas (number)	0	0	0
Number of waterbodies crossed	5	2	-3
Number of NWI wetlands crossed	1	1	0
Total NWI wetland crossing length (feet)	285	95	-190
NWI wetlands within construction ROW (acres) <u>b/</u>	0.5	0.2	-0.3
Agricultural Land within construction ROW (acres) <u>c/</u>	19.0	14.5	-4.5
Forest Areas (miles)s	1.3	1.7	-0.4
Forested Land affected during construction (acres)	15.9	21.2	+5.3
Forested Land affected during operation (acres)	7.9	10.6	+2.7
Length adjacent to existing ROW (miles)	0.1	0	+0.1
<p><u>a/</u> Assuming 100-foot-wide construction ROW and 50-foot-wide permanent ROW. <u>b/</u> Assuming 75-foot-wide construction ROW. <u>c/</u> Includes pasture/hay and cultivated crops. ROW = right-of-way. NWI = National Wetland Inventory Information Sources: GIS – Analysis based on Geodatabase layers and shapefiles. NC Parcel Boundaries and Standard Fields - http://data.nconemap.gov/geoportal/catalog/search/resource/details.page NLCD – 2016 National Land Cover Dataset - https://www.mrlc.gov/data/nlcd-2016-land-cover-conus NWI – National Wetlands Inventory - http://www.fws.gov/wetlands/ USGS – U.S. Geological Survey - http://www.usgs.gov/ NHD – National Hydrography Dataset - http://nhd.usgs.gov/ ESRI - GIS Mapping - http://www.esri.com/</p>			

Name of Respondent: Mr. James Sabol
 Title: Project Manager
 Phone Number: 412-395-3597

**Mountain Valley Pipeline, LLC
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Federal Energy Regulatory Commission

Request:

Resource Report 10 – Alternatives

49. Identify actions and/or route modifications Mountain Valley is proposing to address the concerns itemized below.
 - a. Whitehead – MP 4.7 - landowner is concerned about silviculture operation and excessive removal of timber due to workspace layout and additional temporary workspace on their property. Provide further justification for the need for the additional temporary workspace within forested land on the Whitehead property at about MP 4.83.
 - b. Pollok – Hillview Farms and lease holdings MP 15.0 - the Project may affect seed farm operation (accession number 20190916-5039 / 20190916-5038).
 - c. Rosborough – MP 53.7 - the Project may affect truffle farming (accession number 20190923-4002).
 - d. Madren – MP 58.4 - the Project may cross extensive water and septic infrastructure (accession number 20190916-5007).
 - e. Wallace – MP 59.6 - the Project would remove large oak trees (accession number 20190923-4002). Provide an update on the development of an alternative route variation between Danieley Water Wheel Road and Burch Bridge Road.
 - f. Slade – MP 64.0 - landowner is concerned about removal of tree rows used as wind breaks (accession number 20190912-0017).
 - g. Smith – MP 66.3 - (accession number - 20190923-4002). Provide analysis for a route variation along the west side of Fonville Road continuing on the east side of South Fonville Road.

Response Submitted October 18, 2019:

- a. The Project originally located a long access road (TA-PI-009) originating from Samuel Harris Lane and workspace in conjunction with the pipeline right-of-way, temporary workspace, and other ATWS on the Whitehead property. In the Project May 2019 Supplemental filing, the Project indicated that the access road and accompanying additional temporary workspace were eliminated from the project footprint. At this time, ATWS 1049, 1045, 1046 are located on the property to assist with crossing a large wetland, Bannister River, and Highway 29. The Project offers to reduce temporary workspace from 100 feet to 75 feet for the entire distance on this property due to the sensitivity of tree clearing. Due to the timing of the Environmental Information Request and the Project's October 2019 Supplemental Filing, the elimination of the access road will not be reflected in the alignment sheets. Revised alignment sheets will be filed as part of the Project's Implementation Plan.
- b. As noted in previous EIR responses and supplemental filings, the Project has diligently worked with Mr. Pollok to attempt to address concerns related to the seed farm operation including route adjustments, workspace changes, etc. Currently, the Project is working with the landowner to obtain information related to agency certification related to the seed farm in order to develop an amenable and realistic plan to protect the operation.

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- c. The Project is not aware of active truffle farming near the current pipeline route or that would be impacted by the project footprint. It appears the project alignment may impact relatives of Ms. Rossborough near MP 54.2 and is collocated with high power transmission lines across these properties. The Project will contact the landowner to further discuss this matter.
- d. Previously, the Project has not been granted survey permission at the Madren property on Basin Creek Road and has only received approximate locations of infrastructure. Recently, the Project has negotiated an access agreement with the Madren family's legal representation in order to gain access for survey of the property. If survey data indicates there is a potential conflict with underground infrastructure, the Project will work with the landowner to reduce or avoid impacts to the infrastructure on the property or offer alternative arrangements.
- e. The Project acknowledges the area around Danieleley Water Wheel Road is congested and includes an existing pipeline in the area. After evaluating multiple route options, a new route was adopted in this area (August 2019 Supplemental filing) to address the conflict with the Shambley home site. The current route attempts to collocate with an existing pipeline to reduce environmental impacts in the area. Other routes that were analyzed impacted new landowners in the area.
- f. The Project has worked to reduce the impact on the Blanchard/Slade properties, but due to two stream crossing, including Deep Creek, the project requires additional temporary workspace in order to safely and efficiently cross the waterbodies. In its May 2019 Supplemental Filing, the Project reduced the amount of right-of-way length on the Blanchard/Slade properties in order to better cross Deep Creek. Additionally, the Project's Stony Creek HDD, which enters the Blanchard/Slade property, will reduce impacts to trees and only require a 3 foot clearing.
- g. A route modification to the west of Fonville Road and east of South Fonville Road would impact a landowner that is currently not impacted by the project and place the pipeline alignment within 150 feet of their residence (See Figure 49-1 in Attachment 49-1). Additionally, this would greatly impact landowners who are opposed to the project while removing the project alignment from landowners that are agreeable to the current pipeline route.

During the pre-filing process for the Project, a route was considered that avoided this area, but was not utilized due to issues with a conservation easement and other landowner concerns. It should be noted that a route modification was adopted on the Smith property, per their request, to move the pipeline alignment west towards the property line and away from the middle of the parcel and their residence. Moving the alignment closer to or along the western property line is not feasible due to residences across Sandy Cross Road.

Name of Respondent: Mr. James Sabol
Title: Project Manager
Phone Number: 412-395-3597