



Mountain Valley Pipeline Project

Docket No. CP16-10-000

**Supplemental Responses to  
FERC Staff's Recommended Mitigation in Draft  
Environmental Impact Statement**

**December 2016**

**Mountain Valley Pipeline, LLC  
Mountain Valley Pipeline Project  
Docket No. CP16-10-000**

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14. *Prior to the end of the draft EIS comment period, Mountain Valley shall file with the Secretary documentation of continued coordination with the FS and other ANST stakeholders (NPS, ATC, and local ATC chapters) regarding the newly adopted pipeline crossing of the ANST, including visual simulations modeling both "leaf-on" and "leaf-off" scenarios at the crossing. (section 3.5.1.6)*

**Response Submitted October 27, 2016:** Mountain Valley continues to coordinate with the FS and other ANST stakeholders to prepare visual simulations for both leaf-on and leaf-off conditions. Mountain Valley will file an update with FERC prior to the end of the draft EIS comment period.

**Supplemental Response Submitted December 22, 2016:** On April 28, 2016, Mountain Valley and the FS held an in-person meeting at the ANST to discuss the pipeline crossing methodology, bore pit locations, and viewshed issues. Members of the ATC and Roanoke Appalachian Trail Club were in attendance. On June 16, 2016, Mountain Valley and the FS held an in-person meeting in Roanoke, Virginia to discuss the proposed changes to the ANST crossing and the surrounding areas as well as any changes to the viewshed. Following that meeting, on June 24, 2016, Mountain Valley filed the updated minor route adjustments regarding the ANST to the FERC docket. The FS filed letters dated August 5, 2016 and August 16, 2016 to the FERC docket regarding the ANST crossing.

On October 19, 2016, Mountain Valley and the FS held an in-person meeting in Roanoke, Virginia to discuss a number of topics, including the KOPs for Visual Analysis. In addition, Mountain Valley and the FS are conducting weekly conference calls to discuss items relevant to Mountain Valley's application, including the Plan of Development and the "leaf-off" simulations. Mountain Valley also participated in a conference call with the FS on December 14, 2016 specifically to discuss the visual analysis methodology and KOPs.

Mountain Valley visited all of the agreed-upon KOPs the week of December 5, 2016 to gather necessary information for the "leaf-off" simulations. Mountain Valley was unable to gather this necessary data at an earlier time because the leaves were still present in the Project area. Mountain Valley continues to gather information for the simulations. Mountain Valley expects to submit the updated "leaf-on" and "leaf-off" simulations to the FS, NPS, and FERC in January 2017.

Mountain Valley provided the June 24, 2016 information regarding the ANST to the NPS on December 2, 2016.

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15. *Prior to the end of the draft EIS comment period, Mountain Valley shall file with the Secretary the results of on-site surveys for the Mount Tabor Route Alternative to assess constructability and identify karst features that shall be avoided if the alternative is adopted into the proposed pipeline route. (section 3.5.1.7)*

**Response Submitted October 27, 2016: On October 13, 2016, Mountain Valley incorporated the Mount Tabor Variation into its October 2016 Proposed Route. In its filing on that date, Mountain Valley included the following information:**

- **An analysis for the Mount Tabor Variation, including a figure and table of environmental features from the draft EIS comparing the October 2016 Proposed Route (incorporating the Mount Tabor Variation) and the corresponding segment of the October 2015 Proposed Route. See Attachment A thereto.**
- **A supplemental response to the Commission's June 28, 2016 data request (Geology, Request No. 2) regarding geophysical investigations. See Attachment H thereto. As stated in that supplemental data response, Mountain Valley has surveyed approximately 85% of the formerly-named Mount Tabor Variation for karst features using electrical resistivity and evaluated the remaining 15% through field reviews to better assess and characterize karst features. In addition, Mountain Valley submitted an updated Karst Hazards Assessment (Attachment RR2-4a) and a map (Attachment DR3 Geology-2). Mountain Valley does not expect any significant risk associated with karst that cannot be addressed through minor route adjustment or the Karst Mitigation Plan.**

**Supplemental Response Submitted December 22, 2016: Mountain Valley has conducted two-dimensional surface electrical resistivity (ER) surveys on the physically-accessible portions on all parcels of the October 2016 Proposed Route between mileposts 221.8 and 227.2 (previously referred to as the Mount Tabor Variation, which has been incorporated into the October 2016 Proposed Route). The figure included as Attachment DEIS Recommendation-15 shows the locations where ER surveys were completed. Note that the portions of the alignment highlighted in orange were impassable due to dense vegetation; thus ER data were not collected in these areas. In addition, ER data were not collected north of the Pulaski Fault because this area is underlain by clastic sedimentary bedrock that is not susceptible to karst formation processes.**

**ER imaging is a technique for geophysical analysis of sub-surface conditions using measurements made at the surface using electrodes. LiDAR is a valuable resource for desktop evaluation of karst topography and Mountain Valley utilized LiDAR to evaluate routing in karst areas. However, field evaluation by direct observation and geophysical methods, such as ER, provides a more comprehensive understanding of the sub-surface geology.**

**ER imaging in the sub-surface operates by inducing an electric current into the ground**

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between two electrodes and measuring the change in current at other electrodes. Between mileposts 221.8 and 227.2, Mountain Valley utilized a spacing of 3-5 meters between electrodes. Using a long line of electrodes connected to a cable on the surface, hundreds of resistivity measurements can be collected to create a data set for a two-dimensional cross-section of sub-surface ERs.

Mountain Valley's geophysical experts collected the ER data and used computer software and expertise to analyze the data to determine whether a notable karst feature was present below the ground surface. The ER analysis demonstrated an irregular bedrock surface, which is common in karst terrain. The ER analysis also indicated a stable sub-surface within the design depth of the pipeline excavation and through a depth where the pipeline could affect, or be affected by, any karst features. For example, the ER analysis indicated that open, air-filled voids are not present within these areas.

Based on this ER analysis, coupled with desktop analysis and other field reconnaissance, Mountain Valley does not expect any significant risk associated with karst terrain between mileposts 221.8 and 227.2 of the October 2016 Proposed Route. Any karst encountered during construction can be addressed through the processes detailed in the Karst Mitigation Plan, including minor route adjustments. As such, Mountain Valley confirms that the referenced portion of the October 2016 Proposed Route is preferable to the originally proposed alignment in the vicinity of the Mount Tabor sinkhole plain.

16. *Prior to the end of the draft EIS comment period, Mountain Valley shall file with the Secretary additional information on the tracts identified as requiring further action in table 3.5.3-1 of this EIS. If landowners refuse coordination and/or access, Mountain Valley shall utilize available desktop data to evaluate the landowners' stated concerns. (section 3.5.3.1)*

**Response Submitted October 27, 2016:** Mountain Valley filed an update to table 3.5.3-1 on October 20, 2016. See Attachment B to that filing. Mountain Valley will continue to work with these and other landowners to minimize the impacts to the greatest extent practicable. Prior to the end of the draft EIS comment period, Mountain Valley will file desktop analyses for tracts where Mountain Valley and the landowner have not been able to reach an agreement.

**Supplemental Response Submitted December 22, 2016:** Mountain Valley updated DEIS Table 3.5.3-1 in Attachment DEIS Recommendation-16 with the current status and desktop analyses for tracts where the landowner has not provided access. The redlines shown reflect the mileposts for the October 2016 Proposed Route as well the current responses and statuses.

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19. *Prior to the end of the draft EIS comment period, Mountain Valley shall file with the Secretary site-specific justifications for each of the wetlands for which Mountain Valley requests a right-of-way width greater than 75 feet. (section 4.3.3.3)*

**Response Submitted October 27, 2016: Mountain Valley will file the requested information prior to the end of the draft EIS comment period.**

**Supplemental Response Submitted December 22, 2016: Mountain Valley submits as Attachment DEIS Recommendation-19 a table that includes site-specific justifications for each wetland where Mountain Valley requests a right-of-way width greater than 75 feet. In Mountain Valley's submittal to FERC on July 18, 2016, Mountain Valley inadvertently stated eight locations. The October 2016 Proposed Route includes only seven locations.**



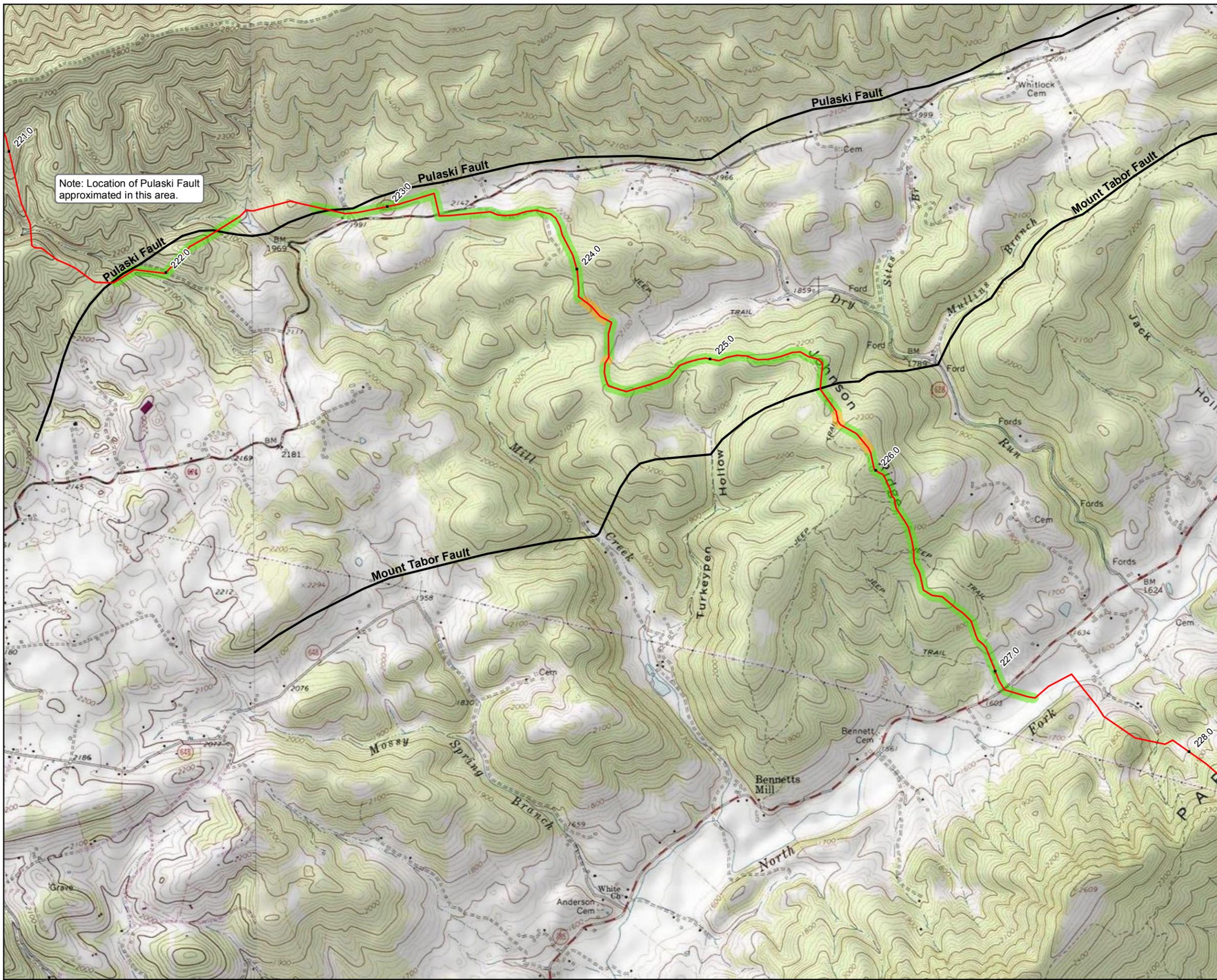
ATTACHMENT DEIS  
RECOMMENDATION - 15  
Geophysical Investigation  
Electric Resistivity Survey  
Mount Tabor Variation

12-15-16

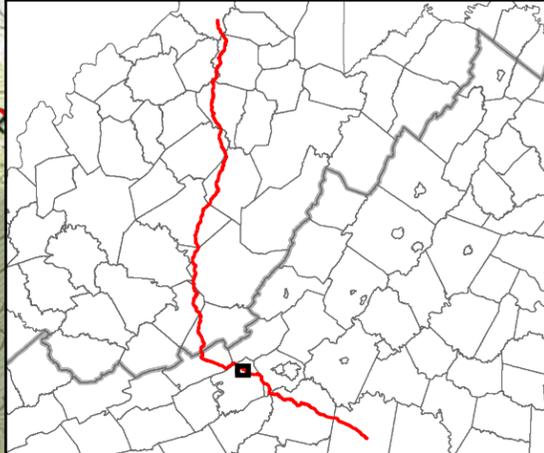


Legend

- ER Performed
- ER Not Performed (physically inaccessible)
- MVP October 2016 Proposed Route with Mile Posts



Note: Location of Pulaski Fault approximated in this area.



Faults from: Geologic map of the McDonalds Mill quadrangle, Virginia: Coiner, L.V., Spears, D.B., and Henika, W.S., 2015, Virginia Division of Mineral Resources 2015.

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**Attachment DEIS Recommendation-16**

DEIS TABLE 3.5.3-1 <u>(MPs Updated for the October 2016 Proposed Route with Responses and Statuses Updated in December 2016)</u> <b>Status of Minor Route Variations Reported by Stakeholders that Are As Yet Unresolved</b>				
FERC ID / Accession Number	Parcel Number	MP	Summary of Issues	Mountain Valley's Response / Current Status
20150316-5023	WV-WB- 23.01, WV- WB-024, WV- WB-025, WV- WB-025.01, MVP-WB-128, MVP-ATWS- 956	<del>97.7, 97.9, 98, 98.1, 98.2</del> <u>97.7, 97.9, 98.1, 98.2, 98.3</u>	Proposed pipeline route cuts property in half and landowner requested that alignment either be re-routed off property or move alignment to one side of property. Landowner concerned about proximity of pipeline alignment to residence and family cemetery on property.	Due to topography, the proposed pipeline route provides the safest and most constructible route. The pipeline would be 0.5 mile from both the homesite and cemetery. Mountain Valley's coordination with the landowner is on-going. <u>The proposed route follows contours that are most conducive to pipeline construction. The route cannot be moved due to unsuitable terrain in the nearby area such as side slopes to the east and west. Residences and the cemetery mentioned in the landowner's comments have been avoided. The landowner is actively negotiating an easement with Mountain Valley.</u>
20150609-5017	WV-WB- 023.01, 024, 025, 025.01	<del>97.8</del> <u>97.7, 97.9, 98.2</u>	Landowner requested re-route to minimize impacts on timber production on property and family cemetery.	Due to topography, the proposed pipeline route provides the safest and most constructible route. The pipeline would be 0.5 mile from both the homesite and cemetery. Mountain Valley's coordination with the landowner is on-going. <u>The proposed route follows contours that are most conducive to pipeline construction. The route cannot be moved due to unsuitable terrain in the nearby area such as side slopes to the east and west. Residences and the cemetery mentioned in the landowner's comments have been avoided. The landowner is actively negotiating an easement with Mountain Valley.</u>

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DEIS TABLE 3.5.3-1 (continued)				
<u>(MPs Updated for the October 2016 Proposed Route with Responses and Statuses Updated in December 2016)</u>				
<b>Status of Minor Route Variations Reported by Stakeholders that Are As Yet Unresolved</b>				
FERC ID / Accession Number	Parcel Number	MP	Summary of Issues	Mountain Valley's Response / Current Status
20150615-5054	WV-NI-004, WV-NI- 005, WV-NI-006, WV- NI-007	<del>444.3</del> <u>111.5</u>	Landowner requested a re-route to avoid an area experiencing development in the town of Craigsville.	Mountain Valley is evaluating a possible route adjustment and is coordinating with the landowner. <u>Mountain Valley reached an agreeable minor route adjustment with this landowner that was incorporated into the October 2016 Proposed Route.</u>
20150610-5243	WV-NI-004, 005, 006, 007	<del>444.5</del> <u>111.5</u>	Landowner requested a re-route to avoid an area experiencing development in the town of Craigsville.	Mountain Valley is evaluating a possible route adjustment and is coordinating with the landowner. <u>Mountain Valley reached an agreeable minor route adjustment with this landowner that was incorporated into the October 2016 Proposed Route.</u>
20150615-5185	WV-GR-022	<del>444.0</del> <u>140.83</u>	Coal mining company concerned that Mountain Valley is not aware that proposed route is within their mining permit space and requests a re-route.	Mountain Valley evaluated the suggested re-routes and determined that they are not viable due to stream and wetland impacts and constructability concerns. Mountain Valley is currently coordinating with the coal mining company on the viability of the proposed route and is evaluating potential impacts (including effects to coal reserves). <u>Mountain Valley reached an agreeable minor route adjustment with this landowner that was incorporated into the October 2016 Proposed Route.</u>
20150120-0096	WV-SU-028	<del>466.79</del> <u>167.1</u>	Landowner requested a re-route to avoid area of potential future residence and to minimize impacts on timber production.	Mountain Valley is evaluating a possible route adjustment and is coordinating with the landowner. <u>Mountain Valley reached an agreeable minor route adjustment with this landowner that was incorporated into the October 2016 Proposed Route.</u>

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<b>DEIS TABLE 3.5.3-1 (continued)</b> <u>(MPs Updated for the October 2016 Proposed Route with Responses and Statuses Updated in December 2016)</u> <b>Status of Minor Route Variations Reported by Stakeholders that Are As Yet Unresolved</b>				
FERC ID / Accession Number	Parcel Number	MP	Summary of Issues	Mountain Valley's Response / Current Status
20150428-0056	WV-SU-029	<del>167.5</del> <u>167.9</u>	Landowner requested a re-route to avoid cutting the property in half and reducing the amount of timber available for heating source.	Mountain Valley is evaluating a possible route adjustment and is coordinating with the property owner. <u>Mountain Valley reached an agreeable minor route adjustment with this landowner that was incorporated into the October 2016 Proposed Route.</u>

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20160223-5034	WV-SU-046	<del>170.5</del> <u>171.3</u>	Landowner requested a re-route to minimize impacts on shallow wells, streams, and residential septic systems on the property.	<p>Mountain Valley stated as of its July 18, 2016 filing, access had not been granted. Mountain Valley indicated that based on desktop data sources, its proposed route would be the most suitable for the site terrain, river crossing, and residential concerns. The FERC staff developed a conceptual minor route variation for this tract and required Mountain Valley to assess it. Mountain Valley indicated the route variation was not feasible due to very steep slopes, a required road closure of Highway WV-3/WV-12, and a requirement for substantial new access and workspaces. We require additional information to determine feasibility. <u>Mountain Valley conducted a desktop analysis and field reviews (where accessible) of the FERC-proposed route variation to avoid parcel WV-SU-046 adjacent to the Greenbrier River crossing. Mountain Valley found obstacles that create construction issues with the FERC's proposed variation. The first obstacle is WV Route 3. Mountain Valley currently plans to cross WV Route 3 via conventional bore due to it being the main thoroughfare between the towns of Hinton and Alderson. At the FERC-proposed crossing, a conventional bore is not feasible due to a rock high wall immediately to the north and the Greenbrier River immediately to the south such that adequate workspaces for the required bore pits are not present. Therefore, an open-cut crossing would be required. The second construction issue is the hillside to the north of WV Route 3. Desktop evaluation shows the slope to be about 70%, which would require winch-hill construction techniques. Mountain Valley would require a new access road for equipment access from either WV Route 3 or WV Route 6 (East Clayton Rd.) which is not feasible given the terrain in the area.</u></p>
20160601-5121	VA-GI-035, VA-GI-035.01	<del>203.4</del> <u>204.3</u>	The New River Conservancy (NRC) stated it holds a perpetual conservation easement for the parcel,	Mountain Valley indicated that it had identified a minor route variation (New River Conservancy

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<p style="color: red;">DEIS TABLE 3.5.3-1 (continued)</p> <p style="color: red;">(MPs Updated for the October 2016 Proposed Route with Responses and Statuses Updated in December 2016)</p> <p style="color: red;">Status of Minor Route Variations Reported by Stakeholders that Are As Yet Unresolved</p>				
FERC ID / Accession Number	Parcel Number	MP	Summary of Issues	Mountain Valley’s Response / Current Status
			also known as the “Sizemore Easement” in its letter dated May 31, 2016. The NRC indicated that it was unable to grant Mountain Valley the right to cross the property under the legally binding terms of the conservation easement.	Variation) that would avoid the conservation easement by departing from the proposed route near MP 202.3, relocating the pipeline to the west and south, and then rejoining the proposed route near MP 203.8. The Variation would be 0.4 mile longer and affect about 7 more acres during construction, be less collocated with existing right-of-way, and cross more forest, karst, and side slopes. Given consideration of these factors, the FERC staff cannot conclude that the New River Conservancy Variation is preferable to the proposed route at this time. However, the FERC staff acknowledge the legitimate and ongoing concerns of the NRC as well as the value of continued coordination among the parties. <a href="#">Mountain Valley changed the name of this variation to Variation 82 in its October 2016 Proposed Route. In addition to the above comments, Variation 82 increases the amount of winch-hill construction techniques required.</a>
Not applicable	multiple	<del>248.5</del> <a href="#">219.9</a>	The route filed in Mountain Valley’s application crossed Craig Creek, which supports populations of endangered mussels, three times on both private and FS lands.	Mountain Valley is coordinating with the FS and has developed a draft minor route variation (FS 71) that would modify the crossing of Craig Creek, reducing the number of crossings from 3 to 1. However, coordination is not yet complete. <a href="#">The October 2016 Proposed Route incorporated the noted minor route variation as well as a decreased LOD in areas where the pipeline parallels Craig Creek.</a>

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FERC ID / Accession Number	Parcel Number	MP	Summary of Issues	Mountain Valley's Response / Current Status
20160219-5147	VA-MO-030	<del>221.4</del> <span style="color: red;">N/A</span>	Landowner requested a re-route to avoid property proposed for a future residence.	Mountain Valley is evaluating a possible route adjustment and is coordinating with the landowner <span style="color: red;"><u>Due to the incorporation of the Mt. Tabor Variation into the October 2016 Proposed Route, this parcel is no longer affected by the Project.</u></span>
20150615-5061	VA-MO-054	<del>224.8</del> <span style="color: red;">N/A</span>	Landowner requested a re-route to minimize impacts on a naturally reproducing population of brown trout downstream of the proposed route.	Mountain Valley is continuing to coordinate with state and federal resource permitting agencies on this request. <span style="color: red;"><u>Due to the incorporation of the Mt. Tabor Variation into the October 2016 Proposed Route, this parcel is no longer affected by the Project.</u></span>
20150616-5100	VA-RO-5149, VA-RO- 4118	<del>237.3, 240.5</del> <span style="color: red;"><u>239.3, 242.5</u></span>	Landowner requested a re-route to avoid property which has a conservation easement and to minimize impacts of sedimentation related to construction.	Mountain Valley is currently not allowed to survey this property, but once access is allowed it will coordinate with the property owner to better ascertain re-route alternatives or other measures. <span style="color: red;"><u>Mountain Valley has proposed utilizing existing roads on these parcels as access roads. There are no other county/state roads in the area that could be used to access the right-of-way. In addition, utilizing existing roads avoids the construction of additional access roads and associated impacts.</u></span>

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DEIS TABLE 3.5.3-1 (continued)				
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FERC ID / Accession Number	Parcel Number	MP	Summary of Issues	Mountain Valley's Response / Current Status
20160406-5119	VA-RO-040, VA-RO- 042, VA-RO- 043, VA- RO- 030 (AR-RO- 281)	<del>238.99</del> <del>239.67</del> <u>241.0</u> – <u>241.7</u>	Landowner requested a re-route to avoid impacts on a residential driveway, bridge, family cemetery, creek, and children play area.	Mountain Valley is currently not allowed to survey this property, but once access is allowed, it will coordinate with the property owner to better ascertain re-route alternatives or other measures. <u>Mountain Valley conducted surveys on the parcel and evaluated a minor route deviation that addresses the landowner's concerns. However, Mountain Valley is reluctant to incorporate the minor route deviation because it would shift a portion of the route onto surrounding parcels where the landowners have denied survey access. Mountain Valley continues to evaluate.</u>
20150615-5089	VA-FR-017.12	<del>254.4</del> <u>253.5</u>	Landowner concerned about pipeline route impacts on water resources, geology, and cultural resources including the use of existing easements.	Mountain Valley stated that it has already minimized or mitigated potential effects to this parcel, including residences, and cannot collocate due to a lack of infrastructure in the area. We require additional information to assess feasibility. <u>Mountain Valley's current alignment follows the ridge-top at the edge of the property. In order to avoid this parcel, Mountain Valley would have to shift east, which is not feasible because it would require severe side-slope construction. Mountain Valley will perform all necessary surveys and avoid or mitigate resources on this parcel. Collocation is not possible due to the lack of an existing corridor in the vicinity of the proposed route.</u>

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DEIS TABLE 3.5.3-1 (continued) <u>(MPs Updated for the October 2016 Proposed Route with Responses and Statuses Updated in December 2016)</u> <b>Status of Minor Route Variations Reported by Stakeholders that Are As Yet Unresolved</b>				
FERC ID / Accession Number	Parcel Number	MP	Summary of Issues	Mountain Valley’s Response / Current Status
20151127-5073	VA-FR- 017.11; VA- FR- 017.15	<del>250.65</del> <del>252.4</del> <u>253.1 –</u> <u>254.6</u>	Landowner requested re-route to avoid impacts on property including the use of existing easements.	Mountain Valley stated that it has already minimized or mitigated potential effects to this parcel, including agricultural lands, and cannot collocate due to a lack of infrastructure in the area. We require additional information to assess feasibility. <u>Mountain Valley’s current alignment follows the ridge-top across these properties. In order to avoid this parcel, Mountain Valley would have to shift its alignment, which is not feasible because it would require severe side-slope construction. In addition, shifting the alignment would bring it closer to the residences to the west of VA-FR-017.11. Mountain Valley has routed the pipeline through an area on VA-FR-017.15 that has been previously clear-cut, which minimizes environmental impacts.</u>
20150129-5217	VA-PI-099	<del>298</del> <u>300.9</u>	Landowner requested a re-route to minimize impacts on farmland on the property.	Mountain Valley stated that it has already minimized or mitigated potential effects to this parcel. Collocation with an existing powerline is not feasible due to the presence of cultural resources, waterbodies, wetlands, and construction feasibility issues. We require additional information to assess feasibility. <u>Mountain Valley has addressed the landowner’s concerns and signed an easement.</u>

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<u>(MPs Updated for the October 2016 Proposed Route with Responses and Statuses Updated in December 2016)</u>				
<b>Status of Minor Route Variations Reported by Stakeholders that Are As Yet Unresolved</b>				
FERC ID / Accession Number	Parcel Number	MP	Summary of Issues	Mountain Valley's Response / Current Status
20151127-5076	VA-PI-100; 101; 102	<del>298.3</del> <del>298.8</del> <u>301.4 –</u> <u>301.7</u>	Landowner requested a re-route to avoid impacts on family farm operations including the use of existing easements.	Mountain Valley stated that it has already minimized or mitigated potential effects to this parcel and would coordinate with the landowner regarding farming (including temporary fencing during construction and permanent replacement fencing) and timber operations during construction. Collocation with an existing powerline is not feasible due to the presence of cultural resources, waterbodies, wetlands, and construction feasibility issues. We require additional information to assess feasibility. <u>Mountain Valley reached an agreeable minor route adjustment with this landowner that was incorporated into the October 2016 Proposed Route.</u>

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**Attachment DEIS Recommendation-19**

<b>Site-specific Justification for Wetlands for which Mountain Valley Requests a Right-of-Way Width Greater Than 75 feet</b>							
<b>State/ Wetland ID</b>	<b>MP</b>	<b>County</b>	<b>Cowardin Class</b>	<b>Length of Pipeline Crossing (ft)</b>	<b>Construction Impacts (Acres)</b>	<b>Operational Impacts (Acres)</b>	<b>Justification</b>
<b>West Virginia</b>							
W-A40	18.7	Harrison	PEM	78	0.2500	0.0697	Additional Temporary Work Space (ATWS) required in this location to accommodate boring equipment to complete the crossing of County Route 5/Marshville-Rockcamp Rd. to the north and stream crossing to the south. Wetland cover type will not change following construction therefore impacts to this PEM wetland will be temporary.
W-A23	34.8	Doddridge	PEM	104	0.3900	0.1655	ATWS required at this location to accommodate boring equipment to complete the crossing of County Route 25. Wetland cover type will not change following construction therefore impacts to this PEM wetland will be temporary.
W-K33-PSS	44.6	Lewis	PSS	0 <u>a</u> /	0.0024	0.0000	Standard width of construction right-of-way (125 feet) required at this location due to crossing of County Route 10 to the north and stream crossing to the south. Because of vegetation clearing, wetland cover type will be converted from PSS to PEM. Impact will be mitigated as part of compensatory mitigation.
W-K33-PEM	44.7	Lewis	PEM	37	0.1113	0.0431	Standard width of construction right-of-way (125 feet) required at this location due to crossing of County Route 10 to the north and stream crossing to the south. Wetland cover type will not change following construction, therefore impacts to this PEM wetland will be temporary.

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<b>State/ Wetland ID</b>	<b>MP</b>	<b>County</b>	<b>Cowardin Class</b>	<b>Length of Pipeline Crossing (ft)</b>	<b>Construction Impacts (Acres)</b>	<b>Operational Impacts (Acres)</b>	<b>Justification</b>
W-UV9	154.9	Greenbrier	PEM	0 <u>a/</u>	0.4291	0.0070	A small area of wetland is within an ATWS required for execution of a hydrostatic test, however no hydrostatic test equipment will be placed within the wetland itself. Mountain Valley will place timber mats in the area of the wetland to reduce impacts by construction equipment. This ATWS is confined by a stream on the north and south, road to the west, and pipeline to the east.
W-MM20	171.3	Summers	PFO	238	2.9913	0.2812	ATWS required at this location to accommodate equipment to complete Greenbrier River crossing. Because of vegetation clearing, wetland cover type will be converted from PFO to PEM. Impacts will be mitigated as part of compensatory mitigation.
<b>Virginia</b>							
W-H2	302.1	Pittsylvania	PEM	560	0.2334	0.5653	Standard width of construction right-of-way (125 feet) required at this location to accommodate boring equipment to complete the crossing of County Route 685 to the north. Wetland cover type will not change following construction, therefore impacts to this PEM wetland will be temporary.
<u>a/</u> Pipeline centerline does not cross the wetland itself but the wetland is located within the construction workspace.							