April 12, 2018

Mr. Roger Kirchen
Virginia Department of Historic Resources
Division of Review and Compliance
2801 Kensington Avenue
Richmond, VA 23221

Subject: Mountain Valley Pipeline Project
Mountain Valley Pipeline Unanticipated Discovery
Resource Number 033-5437
FERC DOCKET NO. CP16-10, DHR FILE #2014 1194

Dear Mr. Kirchen:

On behalf of Mountain Valley Pipeline, LLC (Mountain Valley), a joint venture between affiliates of EQT Midstream Partners, LP and NextEra Energy, Inc., Con Edison Midstream Gas, LLC, WGL Holdings, Inc., and RGC Midstream LLC, Tetra Tech, Inc. (Tetra Tech) is providing herein a National Register of Historic Places (NRHP) evaluation of a historic architectural resource, Virginia Department of Historic Resources (VDHR) No. 033-5437, on Booker T. Washington Highway (Route 122) in Franklin County, Virginia and within the direct Area of Potential Effects (APE) of the Mountain Valley Pipeline Project (MVP) (Figure 1). This resource (comprising a spring box and historic push pile) was located during tree felling for the project. Per the approved *Mountain Valley Pipeline Project Plan for Unanticipated Historic Properties and Human Remains* (Plan), work in the immediate vicinity of the discovery stopped and the area was fenced off to protect the features. Work in the area will not resume until the Environmental Inspector grants clearance. An assessment of the resource was conducted by a qualified archaeologist and architectural historian. The results of this assessment are presented below. Because this resource is located within the limits of disturbance (LOD) for the project, it cannot be avoided during construction. We request your expedited review of the eligibility of this resource for the NRHP. The resource will be protected until concurrence on its eligibility is established (Figures 2, 9, and 10). Figures referenced in the text are included as Attachment 1 to this letter.

Architectural resource 033-5437 is not located within a previously recorded rural historic district. Tetra Tech recommends that 033-5437 is not individually eligible for the NRHP nor as a contributing resource to a larger historic resource or historic district.

Spring Box and Push Pile
Booker T. Washington Highway (Route 122)
Rocky Mount, Franklin County
VDHR No. 033-5437
Tax ID No. 0450006800

The spring box is located on the south side of Booker T. Washington Highway, approximately 930 feet southeast of VDHR No. 033-5436 and approximately 370 feet west of Gills Creek near Mile Post (MP) 269.01 along the pipeline corridor. The feature is a small, semi-subterranean, dry-laid

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masonry structure sheltering a water source (a spring or catchment box). It is located 150 feet from a cleared field, down a slight slope to an unnamed stream. It has been constructed into the slope, with the southeast wall being the slope. To the northeast, within approximately three feet, appears to be a man-manipulated culvert to assist with drainage into the structure. A site plan of the resource is included as Figure 4.

The spring box measures approximately 18 inches from grade to roof, and approximately 55 inches across the front (Figure 5). It is approximately 23 inches from the front to the back and an undetermined subterranean distance (Figure 6). The interior is approximately 18 inches wide, 18 inches from front to back, and 36 inches in interior height. The structure has three sides and a flat roof; the fourth side has an opening that flares out from grade to the roof. The side walls are laid up with flat rocks, while the roof is a single large flat rock that spans the whole structure. The interior space has a roughly square footprint; the bottom of the feature contains several inches of spring water. Shovel tests conducted on June 22, 2015, in the vicinity of the spring box were negative for the presence of cultural material, and therefore there is no archaeological component associated with the spring feature.

An overgrown linear push pile that includes a pile of rocks (Figures 7 and 8) is located approximately 180 feet northwest of the spring box along a treeline at the edge of a cleared field. Specifically, the rock pile is located near MP 268.98 along the pipeline corridor. The push pile follows along the edge of the cleared field and extends northeast/southwest from the rock pile. Limestone rubble, stoneware crockery, clear and colored bottle glass fragments, and miscellaneous rusted metal fragments were observed within the push pile. (Figure 7). A review of historic topographic maps did not identify a historic-era building or structure in this location. During the Phase I archaeological survey, three shovel tests within the archaeological testing location (ATL) containing the pile of rocks yielded small quantities of early twentieth-century domestic artifacts. Shovel Test A-1 contained an undecorated whiteware sherd and a piece of unidentified glass. Shovel Test A-3 contained one undecorated whiteware sherd. Shovel Test C-1 contained four small sherds of undecorated whiteware. All artifacts were recovered from near-surface soil contexts that exhibited considerable soil mixing and disturbance. Each of these positive shovel tests were spatially separated at least 105 feet. The pile of rocks and push pile is interpreted as a secondary deposit of field stones and cultural material, perhaps from a small outbuilding that was not depicted on historic USGS maps. The small quantity of early twentieth-century finds likely represents episodic disposal of residential trash into underused agricultural fields, typical of rural households of the period. Construction of VA Route 122 during the 1930s likely contributed to the disturbed character of soils adjacent to the highway. In summary, the pile of rocks and the limited character of twentieth-century artifacts found in its vicinity are recommended as not eligible for listing in the NRHP.

A summary of the Phase I archaeology survey results in the vicinity of the spring box and push pile is shown in the figure adapted from Appendix A-69 (Figure 8) of *Mountain Valley Pipeline Project, Phase IB Archaeological Survey Report, Franklin County, Virginia* (September 2015). Included as Attachment 2 is the VDHR concurrence letter on the previously mentioned report.

Data for 033-5437 has been uploaded into VDHR's data Sharing System for historic architectural resources and a hard copy survey file will be provided to the VDHR for incorporation into its archive.

MVP is providing this information to your office to meet the requirements of the approved *Mountain Valley Pipeline Project Plan for Unanticipated Historic Properties and Human Remains*. A copy of the letter will also be filed on with the Federal Energy Regulatory Commission. Please review this information and provide comments to the Project Archaeologist, Evelyn Tidlow, at:

Ms. Evelyn M. Tidlow
Mountain Valley Pipeline
2200 Rice Drive
Canonsburg, PA 15317

(612) 812-5478
e.tidlow@gaiconsultants.com

Should you have any questions during your review, feel free to contact Evelyn Tidlow by telephone at (612) 812-5478 or by e-mail at E.Tidlow@gaiconsultants.com. Thank you for your attention.

Sincerely,

Hannah L. Dye

Hannah L. Dye, MA
Architectural Historian

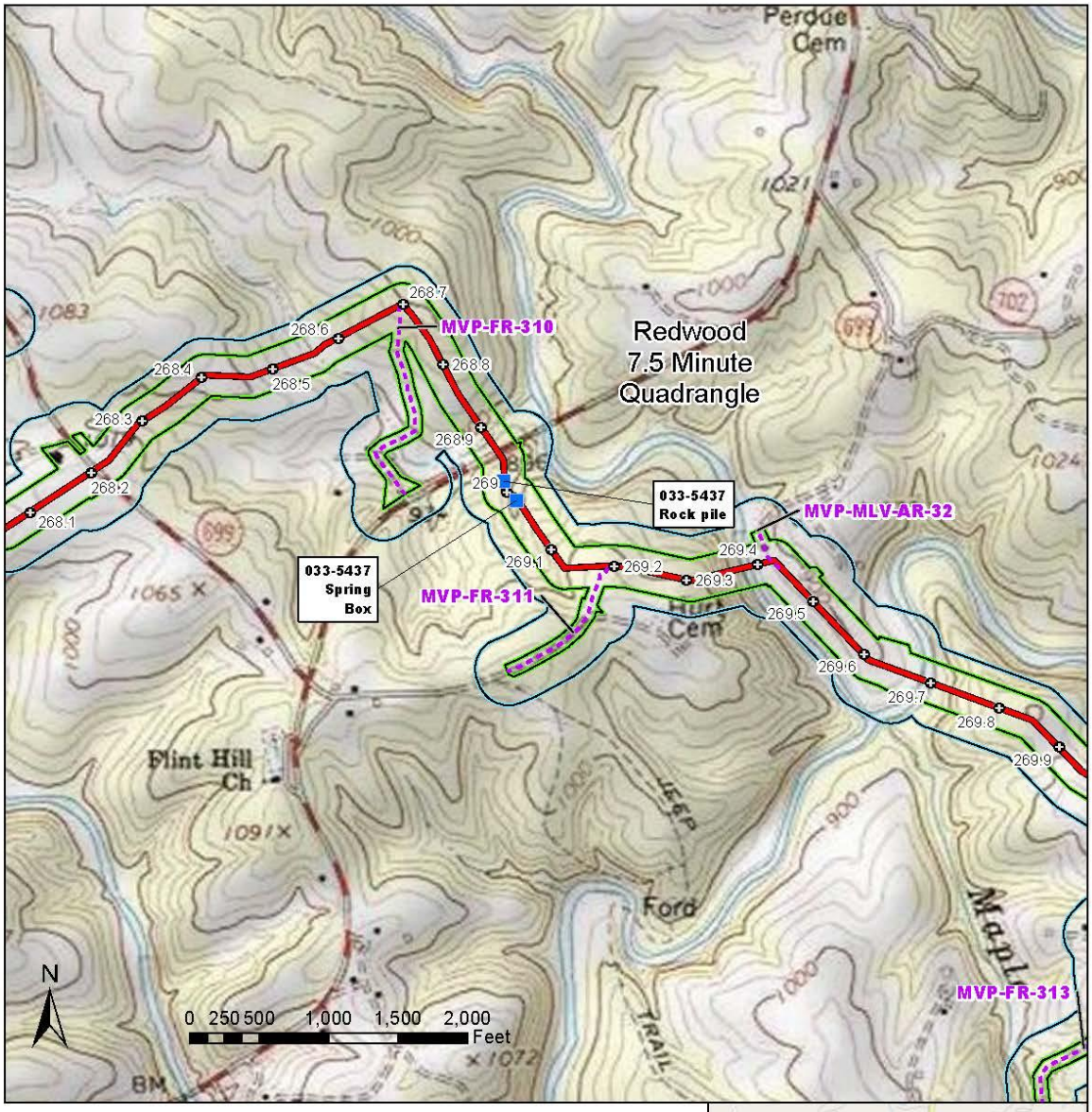
Attachments

Attachment 1 – Figures
Attachment 2 – VDHR December 30, 2015 Concurrence Letter

cc: Megan Neylon, EQT (with no attachments)
Evelyn Tidlow, GAI (with no attachments)

ATTACHMENT 1
FIGURES

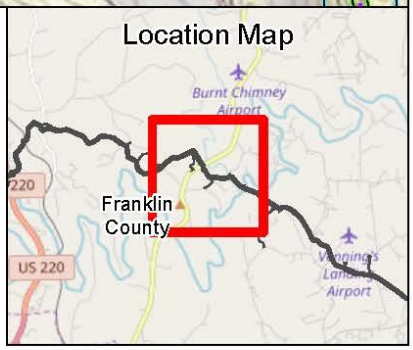
TETRA TECH



Legend

- Resource Location
- Milepost
- Proposed Access Road
- Proposed Pipeline
- 300-Foot Direct Effects APE
- Indirect APE for Historic Architectural Resources

Figure 1
033-5437
Location Map



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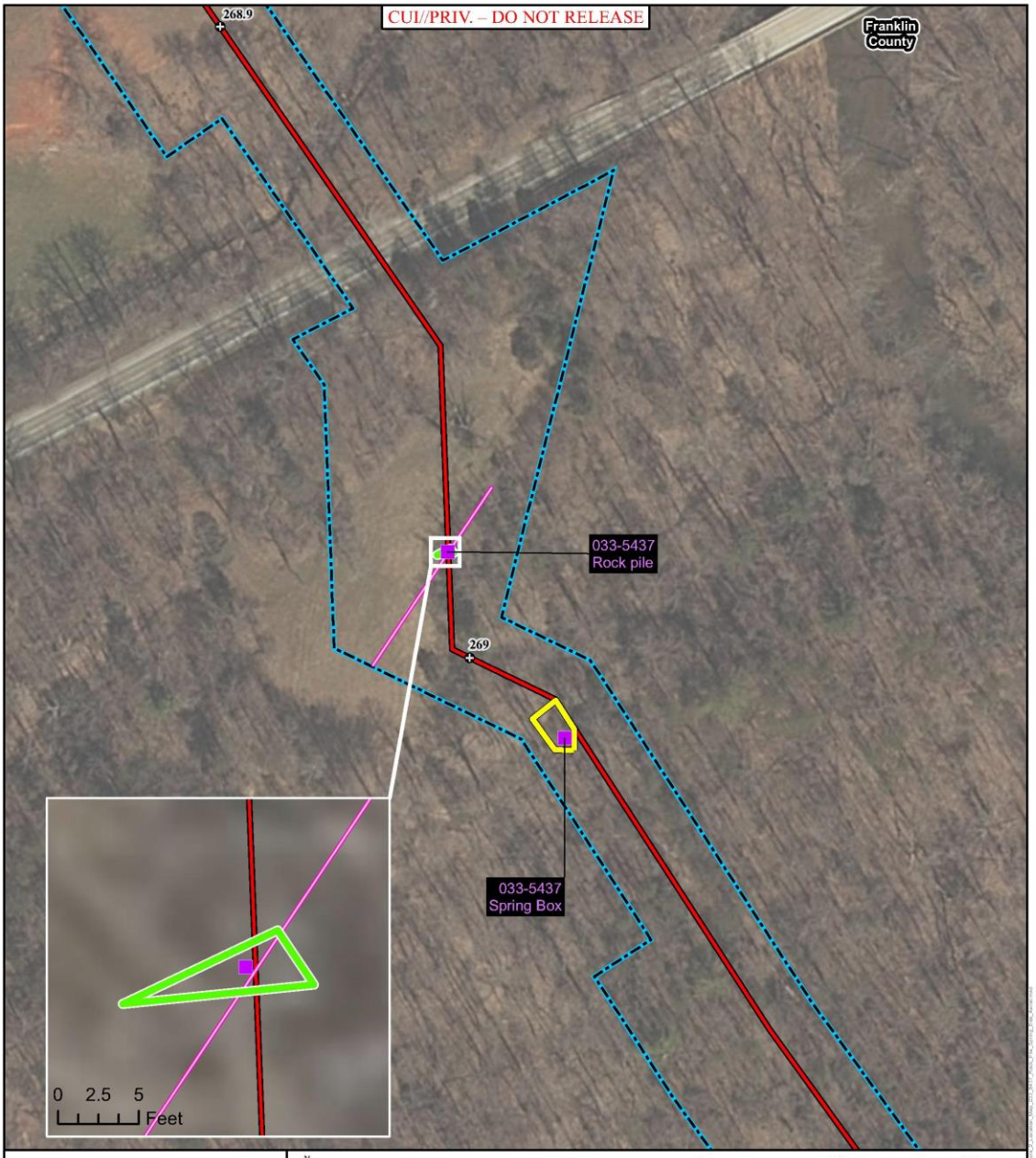


Mountain Valley Pipeline Project

N

NAD 1983 UTM 17N

0 100 200 Feet

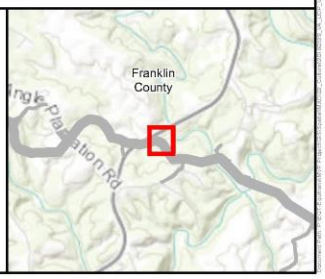
Mountain Valley PIPELINE

Figure 2
Location of Rock Pile, Push Pile, and Spring Box (033-5437)
Franklin County, Virginia

April 2018

Data Sources:ESRI, USGS, VDHR, NPS, USDA.

- Historic Resource
- Fencing Surrounding Spring Box
- Fencing Surrounding Rock pile
- Push pile
- Milepost
- Proposed Pipeline
- Construction Limits of Disturbance



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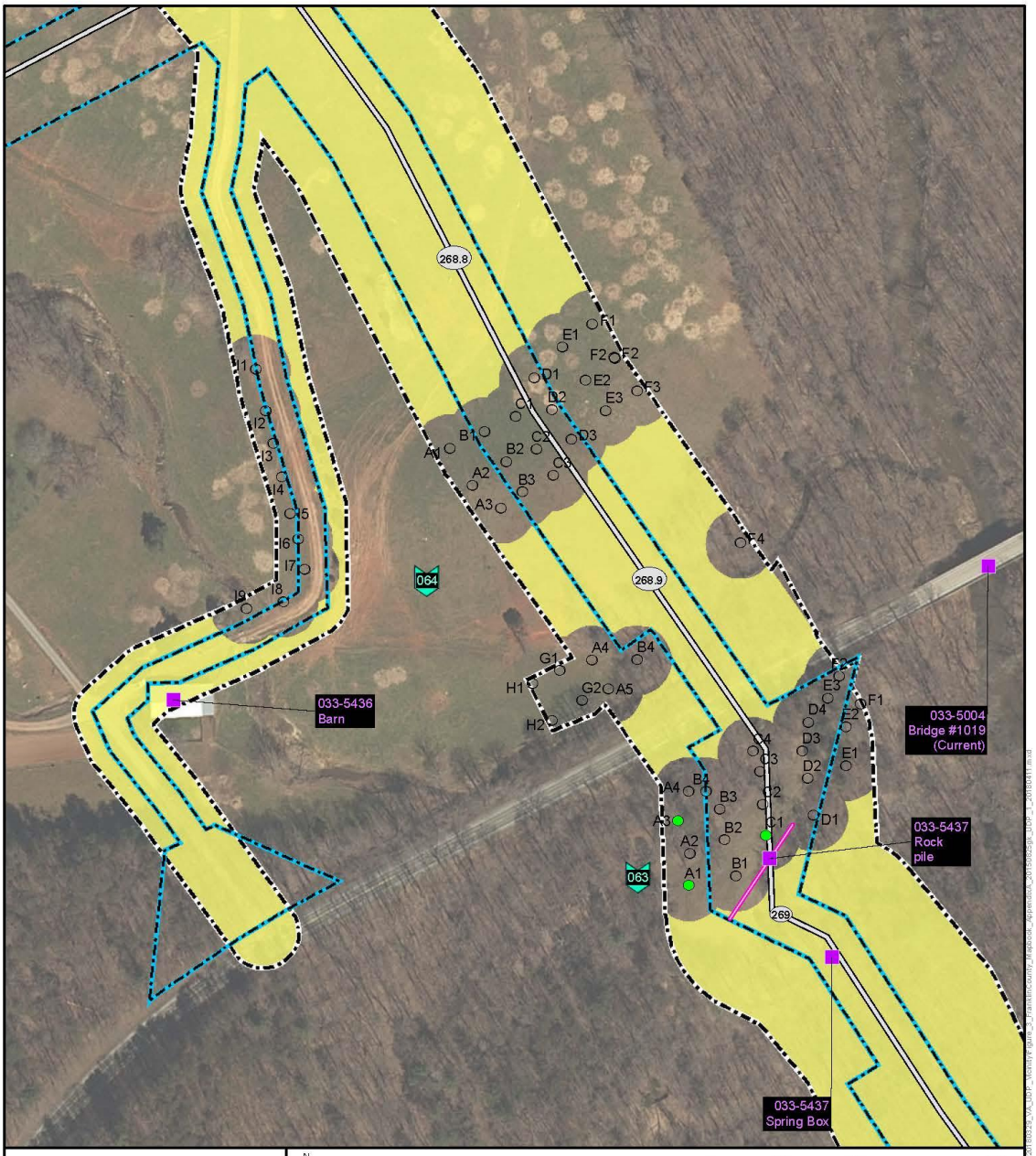

Mountain Valley Pipeline Project

NAD 1983 UTM 17N

0 100 200 400 Feet

Mountain Valley PIPELINE

Figure 3
Appendix A:
Shovel Test Results
Franklin County

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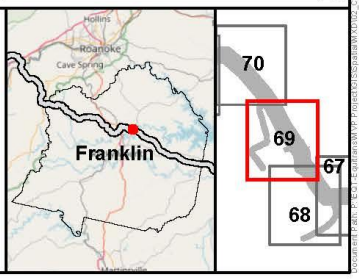
AUGUST 2015
(Updated APRIL 2018)

Data Sources:ESRI Streaming Data, 2014

- Historic Resource
- Negative ST
- Positive ST - Historic
- Milepost
- Push pile
- Proposed Pipeline
- ATL Guide
- Construction Limits of Disturbance
- Survey Boundary
- Pedestrian Survey

Notes:
ATL – Archaeological Test Location
ST = Shovel Test
Tested areas outside survey boundary under project consideration.



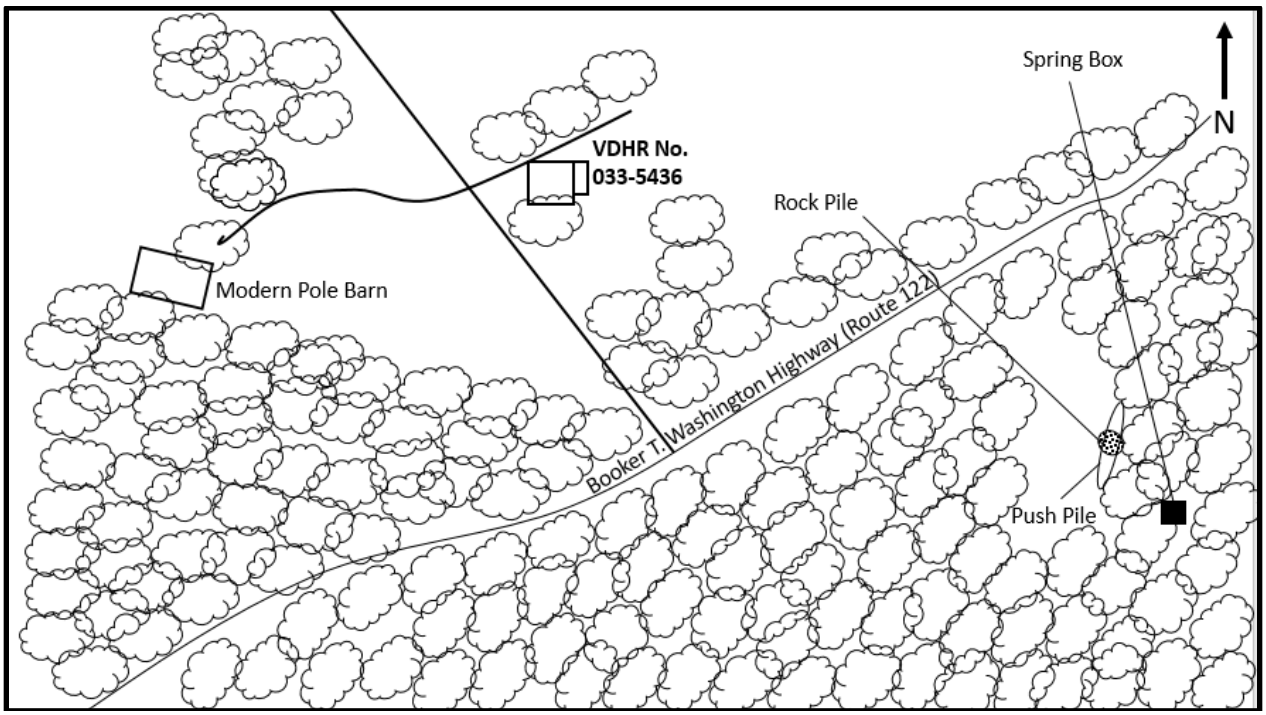


Figure 4. Site Plan. Spring box, push pile, and rock pile, Booker T. Washington Highway (Route 122), Rocky Mount, Franklin County

Figure 5: Spring box, Booker T. Washington Highway (Route 122) Rocky Mount, Franklin County, View Southeast

Figure 6: Spring box, Booker T. Washington Highway (Route 122)
Rocky Mount, Franklin County, View East

Figure 7. Push pile with historic cultural material, Washington Highway (Route 122)
Rocky Mount, Franklin County, Southwest

Figure 8: Rock pile contained within push pile, Booker T. Washington Highway (Route 122) Rocky Mount, Franklin County, Northwest

Figure 9: Fencing Surrounding 033-5437 Spring Box, Booker T. Washington Highway (Route 122) Rocky Mount, Franklin County, Northwest

Figure 10: Fencing Surrounding 033-5437 Rock Pile
Booker T. Washington Highway (Route 122)
Rocky Mount, Franklin County, Northwest

Attachment 2

VDHR December 30, 2015 Concurrence Letter

COMMONWEALTH of VIRGINIA

Molly Joseph Ward
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

December 30, 2015

Ms. Megan L. Neylon
Mountain Valley Pipeline
625 Liberty Avenue, Suite 1700
Pittsburgh, PA 15222

Re: *Mountain Valley Pipeline Project Phase IB Archaeological Survey Report, Franklin County, Virginia*
DHR File No. 2014-1194; FERC #PF15-3-000

Dear Ms. Neylon:

The Department of Historic Resources (DHR) has received for review the report referenced above prepared by Tetra Tech for Mountain Valley Pipeline, LLC. It is our opinion that this report meets DHR's *Survey Guidelines* and other applicable standards. We provide the following comments as assistance to Mountain Valley Pipeline, LLC and the Federal Energy Regulatory Commission in meeting their collective responsibilities under Section 106 of the National Historic Preservation Act.

The Phase IB archaeological survey covered approximately 28 miles of the total 36 miles of project area in Franklin County, VA. It is unclear whether the 28 miles refers only to the 300' pipeline study corridor or also includes access roads along this portion of the project. This confusion should be clarified and total acreage surveyed noted in a revised Section 1.0 which can be submitted separately to DHR and we will incorporate the new pages into the existing report. Archaeological survey of the remaining 8.5 miles will be completed and presented as an addendum to this report

The survey identified 22 archaeological sites and 89 isolated finds. Isolated finds are, by definition, not eligible for listing in the National Register of Historic Places and no further consideration of these resources is warranted. The consultant recommends and DHR concurs that the following 12 sites are *potentially eligible* for listing in the National Register of Historic Places (NRHP): **44FR0355**, **44FR0357**, **44FR0360**, **44FR0363**, **44FR0365**, **44FR0366**, **44FR0368**, **44FR0369**, **44FR0370**, **44FR0371**, **44FR0372**, and **44FR0373**. Further, the consultant recommends and DHR concurs that the following seven (7) sites are *not eligible* for NRHP listing: **44FR0356**, **44FR0358**, **44FR0359**, **44FR0361**, **44FR0362**, **44FR0374**, and **44FR0375**. Finally, the consultant recommends the remaining three (3) sites as not eligible for NRHP listing; however, since significant and related deposits associated with these sites may be located beyond the study area, DHR recommends these sites as *unevaluated* for NRHP listing, but warranting no further work within the Area of Potential Effects (APE): **44FR0354**, **44FR0364**, and **44FR0367**.

The 12 potentially eligible sites should be avoided or subjected to Phase II archaeological evaluation. It is our understanding from the report and the document entitled *Mountain Valley Pipeline Project Phase II Work Plan, Pittsylvania, Franklin, Roanoke, Montgomery, and Giles County, Virginia* that four (4) of the potentially eligible sites - 44FR0355, 44FR0357, 44FR0371, and 44FR0372 - will be avoided by the project and no further archaeological study of these resources is warranted unless impacts are proposed. Depending on the proximity of the final design to the sites, more detailed avoidance plans may be warranted to ensure site protection during construction.

Regarding the proposed scopes-of-work in the *Phase II Work Plan* for the Franklin County sites, DHR recommends the following:

1. Sites evaluated at the Phase II level should be fully delineated, if possible.
2. The number of proposed test units per acre is low. Although DHR's *Survey Guidelines* suggest a 2-10% sampling at the Phase II level, it is our opinion that 10 1m x 1m test units per acre is reasonable.
3. Phase II analyses on all sites with significant alluvial deposits would benefit from specialized geomorphological assessments, as recommended for site 44FR0368.

Please submit a revised Section 1.0 at your earliest convenience. If you have any questions regarding these comments or our review of this project, please do not hesitate to contact me at roger.kirchen@dhr.virginia.gov.

Sincerely,

Roger W. Kirchen, Director
Review and Compliance Division

c. Ms. Sydne Marshall, Tetra Tech