

Ms. Susan Pierce  
 Deputy State Historic Preservation Officer  
 West Virginia Division of Culture and History  
 1900 Kanawha Boulevard East  
 Charleston, WV 25305-0300

February 22, 2019

**Subject: Mountain Valley Pipeline Project  
 Slip Mitigation Workspaces MVP-ATWS-SM-021 (Ext), MVP-ATWS-SM-026 (Ext), MVP-ATWS-SM-048 (Ext), and MVP-ATWS-SM-060  
 Request for Concurrence on Disturbance and No Further Survey Recommendations  
 FR# 15-67-Multi  
 FERC Docket CP16-10**

Dear Ms. Pierce,

Mountain Valley Pipeline, LLC (MVP), a joint venture between affiliates of EQT Midstream Partners, LP, NextEra Energy, Inc., Con Edison Gas Midstream, LLC, WGL Holdings, Inc., and RGC Midstream, LLC, has received an Order issuing a Certificate of Public Convenience and Necessity (Order) from the Federal Energy Regulatory Commission (FERC), pursuant to Section 7(c) of the Natural Gas Act, authorizing it to construct and operate the proposed Mountain Valley Pipeline project (project) in 17 counties in West Virginia and Virginia. In compliance with the executed Programmatic Agreement (PA) for the project, SEARCH has prepared this letter report documenting the results of background research and cultural resource field surveys for four variances outside the areas previously surveyed and reported on for the project (**Table 1**). The results are presented below for review and comment by the West Virginia Division of Culture and History (WVDCH). Figures referenced below appear within **Attachment 1**, and photographs referenced below appear within **Attachment 2**.

**Table 1. Lists of variances surveyed.**

County	Facility Type	Facility Name	Survey Date	Milepost (MP)
Wetzel	Workspace	MVP-ATWS-SM-021 (Ext)	2/14/2019	MP 2.57–2. 61
Wetzel	Workspace	MVP-ATWS-SM-026 (Ext)	2/13/2019	MP 3.55–3.67
Harrison	Workspace	MVP-ATWS-SM-048 (Ext)	2/14/2019	MP 24.06–24.11
Lewis	Workspace	MVP-ATWS-SM-060	2/14/2019	MP 62.40

The direct area of potential effect (APE) was determined in consultation with the WVDCH to compose a 91.5-meter (m) (300-foot [ft]) corridor centered on the proposed pipeline, or 45.7 m (150 ft) on either side of the pipe centerline. For access roads, the direct APE was defined as a 30.5 m (100 ft) corridor centered on each proposed access road, 15.2 m (50 ft) on either side of the proposed road centerline. The direct APE also includes the limits of ground disturbance for facilities necessary to construct, operate, and maintain the pipeline.

The indirect APE primarily concerns the visual impacts of the project for aboveground project elements, as well as for the 15.2 m (50 ft) corridor (permanent right-of-way) that will remain after construction to service and maintain the pipeline. The indirect APE was determined in consultation with WVDCH as 0.4 kilometers (km) (0.25 miles [mi]) on either side of the proposed pipe centerline and a 0.8 km (0.5 mi) radius around each compressor station location. For the architectural and historic resources reported herein, the indirect APE also concerns the visual impacts of the project for ancillary project elements used to construct the pipeline (i.e., temporary access roads and temporary workspaces). Variances MVP-ATWS-



SM-021 (Ext), MVP-ATWS-SM-026 (Ext), MVP-ATWS-SM-048 (Ext), and MVP-ATWS-SM-060 are within the indirect APE, as previously reported (Espino et al. 2015).

SEARCH reviewed the WVDCH Map Viewer and MVP datasets for records of previously recorded cultural resources within the direct APE for each variance. These reviews identified two historic archaeological resources (46WZ123 and 46WZ132) in the vicinity of MVP-ATWS-SM-021 (Ext), historic archaeological resources (46WZ134 and 46WZ137) and a historic cemetery (46WZ153-CEM) in the vicinity of MVP-ATWS-SM-026 (Ext), and one historic isolated find (46HS107) in the vicinity of MVP-ATWS-SM-048 (Ext). Locations of previously recorded cultural resources are discussed below in conjunction with the associated pipeline facility.

## Results

### *MVP-ATWS-SM-021 (Ext)*

On February 14, 2019, SEARCH performed a visual reconnaissance survey at MVP-ATWS-SM-021 (Ext). The proposed variance represents an extension to slip mitigation MVP-ATWS-SM-021. The slip mitigation workspace will be used to stabilize the hillside and will require tree clearing. This temporary workspace in Wetzel County abuts the southern edge of the pipeline corridor between MP 2.57 and MP 2.61 (**Figure 1**). MVP-ATWS-SM-021 (Ext) covers 0.14 hectares (ha) (0.34 acres [ac]) and is on a wooded hillside between Fallen Timber and Gilbert Ridge Roads in the town of Smithfield (**Figure 2**). The majority of the workspace was previously surveyed and documented by Tetra Tech, Inc. (Tetra Tech) (Espino et al. 2015) in 2015 and SEARCH (Freedman 2018a) in 2018. The 2015 survey documented two historic archaeological sites (46WZ123 and 46WZ132) in the vicinity of the proposed workspace (see **Figure 1**). The sites were determined not eligible for listing in the National Register of Historic Places (NRHP) in a letter from the WVDCH dated October 6, 2015. No cultural resources were documented within the direct APE of the proposed workspace during the 2018 survey. Additionally, no cultural resources were identified as part of the current survey.

### *Archaeological Survey*

Visual reconnaissance and pedestrian survey of MVP-ATWS-SM-021 (Ext) was completed by a crew of four archaeologists who walked the survey area. No subsurface testing was conducted due to steeply sloping terrain and an active slip (**Photograph 1**). Based on the field observations and the previous reporting, no additional archaeological survey is recommended for this variance.

### *Architectural History Survey*

Pedestrian survey and visual reconnaissance did not identify aboveground historic resources within or visible from the direct APE. The indirect APE in this area was previously documented for the project (Espino et al. 2015) (see **Figures 1 and 2**); no NRHP-eligible or -listed resources were identified.

Tetra Tech architectural historian Hannah Dye conducted the previous survey of the indirect APE in the area and reviewed the architectural history survey results presented here. Ms. Dye recommends that the temporary use of MVP-ATWS-SM-021 (Ext) will have no effect to any NRHP-eligible or NRHP-listed aboveground historic resources. In addition, the removal of trees will not have indirect visual impacts because views of the workspace are shielded by sloping terrain and surround forested land. Therefore, no further architectural history survey is recommended related to MVP's use of this temporary workspace.



### ***MVP-ATWS-SM-026 (Ext)***

On February 13, 2019, SEARCH performed a visual reconnaissance survey at MVP-ATWS-SM-026 (Ext). The proposed variance represents an extension to slip mitigation MVP-ATWS-SM-026. The slip mitigation workspace will be used to stabilize the hillside and will require tree clearing. This temporary workspace in Wetzel County abuts the eastern edge of the pipeline corridor between MP 3.55 and MP 3.67 and is south of proposed workspace MVP-ATWS-SM-021 (Ext) (see **Figure 1**). Workspace MVP-ATWS-SM-026 (Ext) covers 0.71 ha (1.75 ac) and is on a wooded hillside east of Gilbert Ridge Road in the town of Smithfield (**Figure 3**). The majority of the workspace was previously surveyed and documented by Tetra Tech (Espino et al. 2015) and SEARCH (Freedman 2018a). The 2015 survey documented two historic archaeological sites (46WZ134 and 46WZ137) and a historic cemetery (46WZ153-CEM) in the vicinity of MVP-ATWS-SM-026 (Ext). All historic cultural resources were determined not eligible for listing in the NRHP in a letter from the WVDCH dated October 6, 2015. No cultural resources were identified as part of the current cultural resource survey.

#### *Archaeological Survey*

Visual reconnaissance and pedestrian survey of MVP-ATWS-SM-026 (Ext) was completed by a crew of three archaeologists who walked the survey area. No subsurface testing was conducted due to steeply sloping terrain and an active slip (**Photograph 2**). Based on the field observations and the previous reporting, no additional archaeological survey is recommended for this variance.

#### *Architectural History Survey*

Visual reconnaissance and pedestrian survey did not identify aboveground historic resources within or visible from the direct APE. The indirect APE in this area was previously documented for the project (Espino et al. 2015) (see **Figures 1 and 3**); no NRHP-eligible or -listed resources were identified.

Tetra Tech architectural historian Hannah Dye conducted the previous survey of the indirect APE in the area and reviewed the architectural history survey results presented here. Ms. Dye recommends that the temporary use of MVP-ATWS-SM-026 (Ext) will have no effect to any NRHP-eligible or NRHP-listed aboveground historic resources. In addition, the removal of trees will not have indirect visual impacts because views of the workspace are shielded by sloping terrain and surround forested land. Therefore, no further architectural history survey is recommended related to MVP's use of this temporary workspace.

### ***MVP-ATWS-SM-048 (Ext)***

On February 14, 2019, SEARCH performed a visual reconnaissance survey at MVP-ATWS-SM-048 (Ext). This proposed variance represents an extension to slip mitigation MVP-ATWS-SM-048. This proposed slip mitigation workspace will be used to stabilize the hillside and will require tree clearing. The temporary workspace in Harrison County abuts the northern edge of the pipeline corridor between MP 24.06 and MP 24.11 (**Figure 4**). Workspace MVP-ATWS-SM-048 (Ext) covers 0.35 ha (0.85 ac) and is on a wooded hillside east of Stillhouse Road in the town of Salem (**Figure 5**). The majority of the workspace was previously surveyed and documented by Tetra Tech (Espino et al. 2015) and SEARCH (Freedman 2018b). The 2015 survey documented one historic isolate (46HS107). This historic cultural resource was determined not eligible for listing in the NRHP in a letter from the WVDCH dated October 6, 2015. No cultural resources were documented within the direct APE of the proposed workspace during the 2018 survey. Additionally, no cultural resources were identified as part of the current cultural resource survey.



### *Archaeological Survey*

Visual reconnaissance and pedestrian survey of MVP-ATWS-SM-048 (Ext) was completed by a crew of three archaeologists who walked the survey area. No subsurface testing was conducted due to steeply sloping terrain and an active slip (**Photograph 3**). Based on the field observations and the previous reporting, no additional archaeological survey is recommended for this variance.

### *Architectural History Survey*

Visual reconnaissance and pedestrian survey did not identify aboveground historic resources within or visible from the direct APE. The indirect APE in this area was previously documented for the project (Espino et al. 2015, 2016) (see **Figures 4 and 5**); no NRHP-eligible or -listed resources were identified.

Tetra Tech architectural historian Hannah Dye conducted the previous survey of the indirect APE in the area and reviewed the architectural history survey results presented here. Ms. Dye recommends that the temporary use of MVP-ATWS-SM-048 (Ext) will have no effect to any NRHP-eligible or NRHP-listed aboveground historic resources. In addition, the removal of trees will not have indirect visual impacts because views of the workspace are shielded by sloping terrain and surround forested land. Therefore, no further architectural history survey is recommended related to MVP's use of this temporary workspaces.

### ***MVP-ATWS-SM-060***

On February 14, 2019, SEARCH performed a visual reconnaissance and pedestrian survey at MVP-ATWS-SM-060. The proposed slip mitigation workspace will be used to stabilize the hillside and will require tree clearing. This temporary workspace in Lewis County is approximately 205 m (672.6 ft) south of MP 62. 40 (**Figure 6**). Workspace MVP-ATWS-SM-060 covers 0.08 ha (0.19 ac) and is on a wooded hillside along the southern margin of access road MVP-LE-077.03 (**Figure 7**). A portion of the workspace was previously surveyed and documented by Tetra Tech (Espino et al. 2016), during which no cultural resources were identified. No cultural resources were identified as part of the current survey.

### *Archaeological Survey*

The visual reconnaissance and pedestrian survey of MVP-ATWS-SM-060 was completed by a crew of four archaeologists who walked the survey area. No subsurface testing was conducted due to steeply sloping terrain and an active slip (**Photograph 4**). Based on the field observations and the previous reporting, no additional archaeological survey is recommended for this variance.

### *Architectural History Survey*

Visual reconnaissance and pedestrian survey did not identify aboveground historic resources within or visible from the direct APE. The indirect APE in this area was previously documented for the project (Espino et al. 2016) (see **Figures 6 and 7**); no NRHP-eligible or -listed resources were identified.

Tetra Tech architectural historian Hannah Dye conducted the previous survey of the indirect APE in the area and reviewed the architectural history survey results presented here. Ms. Dye recommends that the temporary use of MVP-ATWS-SM-060 will have no effect to any NRHP-eligible or NRHP-listed aboveground historic resources. In addition, the removal of trees will not have indirect visual impacts



because views of the workspace are shielded by sloping terrain and surround forested land. Therefore, no further architectural history survey is recommended related to MVP's use of this temporary workspaces.

Please review this letter report under Stipulation IV. A. in the executed PA of the project. This letter report will be filed with the FERC, the lead federal agency for the project. Per Stipulation IV. E., comments should be submitted to Paul Friedman at the FERC. He can be reached at:

Mr. Paul Friedman  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426  
(202) 502-8059  
paul.friedman@ferc.gov

You may contact Evelyn Tidlow, GAI, by telephone at (612) 812-5478 or by email at E.Tidlow@gaiconsultants.com if you have technical questions during your review.

Thank you for your attention.

Sincerely,

A handwritten signature in black ink that reads "Kelly S. Hockersmith".

Kelly S. Hockersmith, MA  
Principal Investigator

cc: Evelyn Tidlow, GAI  
Megan Neylon, EQT  
Sean Sparks, Tetra Tech  
James Marine, Tetra Tech  
Russel Townsend, Eastern Band of Cherokee Indians  
Dr. Wenonah G. Haire, Catawba Indian Nation  
Caitlin Totherow, Catawba Indian Nation



## References

Espino, Jason, Hannah Dye, Matt Lockett, and Igor Nurabas

2015 *Volume I Mountain Valley Pipeline Cultural Resources Survey: Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia*. FR# 15-67-Multi. Docket No. PF15-3. Report prepared for Mountain Valley Pipeline, LLC by Tetra Tech, Inc.

Espino, Jason, Sarah Heuer, Hannah Dye, and James T. Marine

2016 *Addendum 1 to Volume I Mountain Valley Pipeline Cultural Resources Survey: Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia*. FR# 15-67-Multi. Docket No. CP16-10. Report prepared for Mountain Valley Pipeline, LLC by Tetra Tech, Inc.

Freedman, Jacob A

2018a *Mountain Valley Pipeline Project Slip Mitigation Workspaces MVP-ATWS-SM-020, MVP-ATWS-SM-021, MVP-ATWS-SM022, and MVP-ATWS-SM-026 Request for Concurrence on Disturbance and No Further Survey Recommendations*. FR File #15-67 Multi. FERC Docket CP16-10. Report prepared by SEARCH, Inc. for Mountain Valley Pipeline, LLC.

2018b *Mountain Valley Pipeline Project Slip Mitigation Workspaces MVP-ATWS-SM-048, MVP-ATWS-SM-047, and MVP-ATWS-SM-044 Request for Concurrence on Disturbance and No Further Survey Recommendations*. FR# 15-67-Multi FERC Docket CP16-10 Report prepared by SEARCH, Inc. for Mountain Valley Pipeline, LLC.



## **ATTACHMENT 1: FIGURES**





CUI//PRIV – DO NOT RELEASE

BRADSHAW  
CS LOD

MVP-WE-008.02

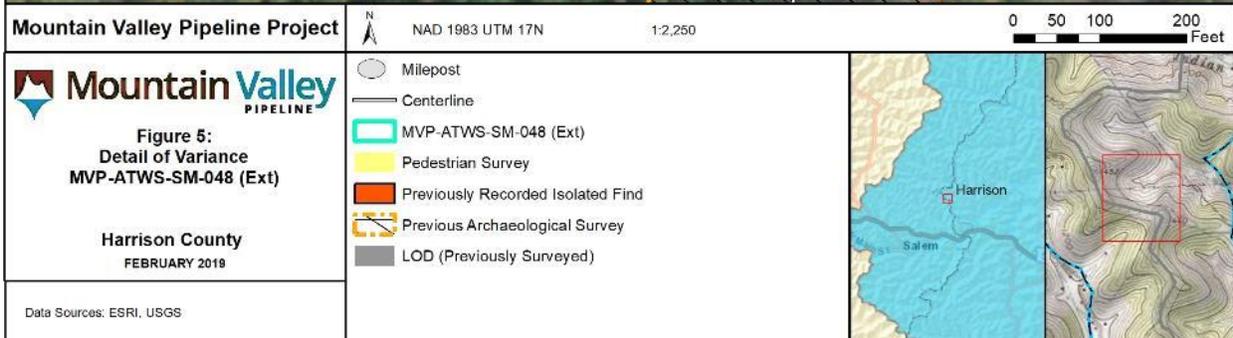
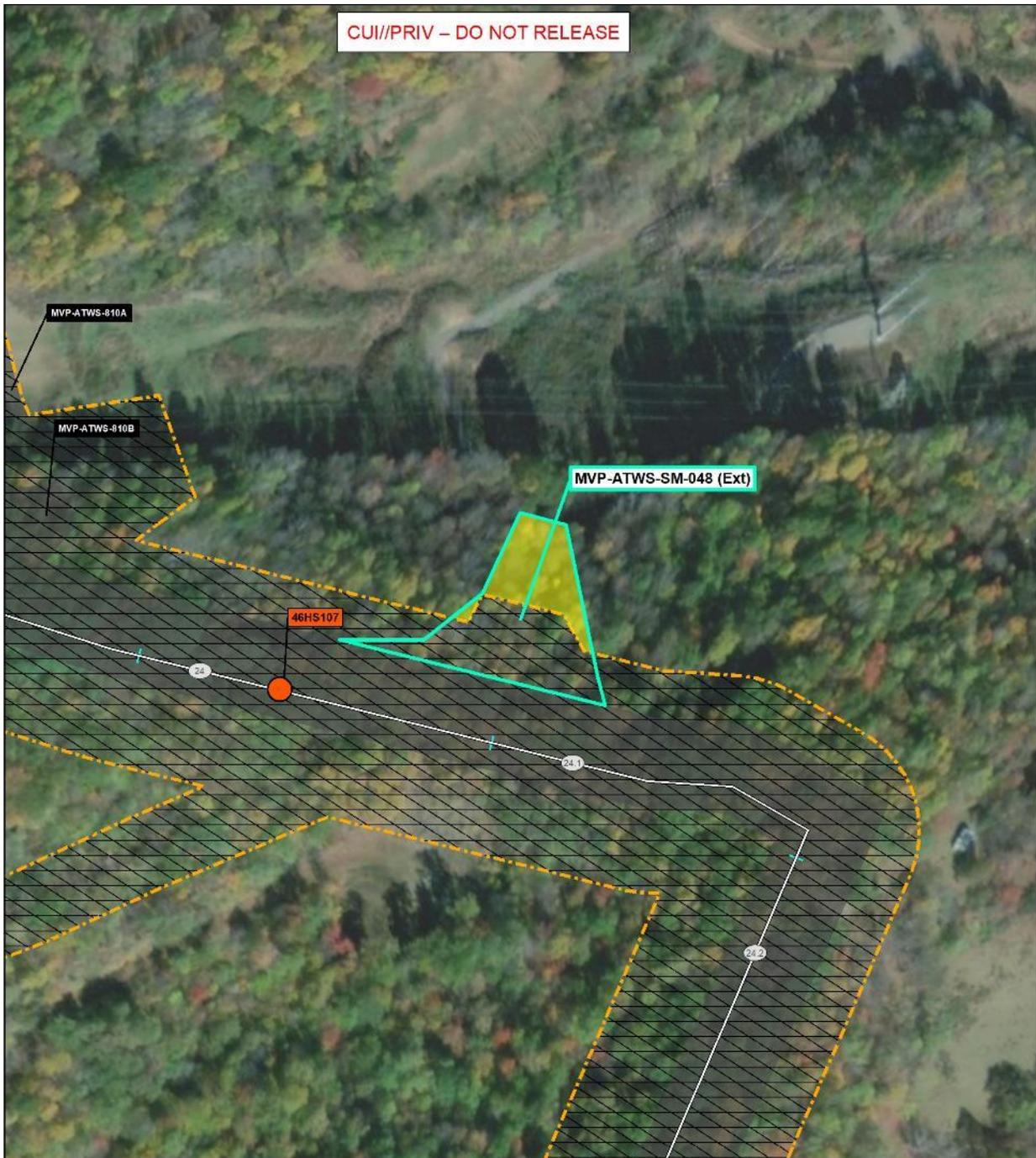
MVP-ATWS-SM-021 (Ext)

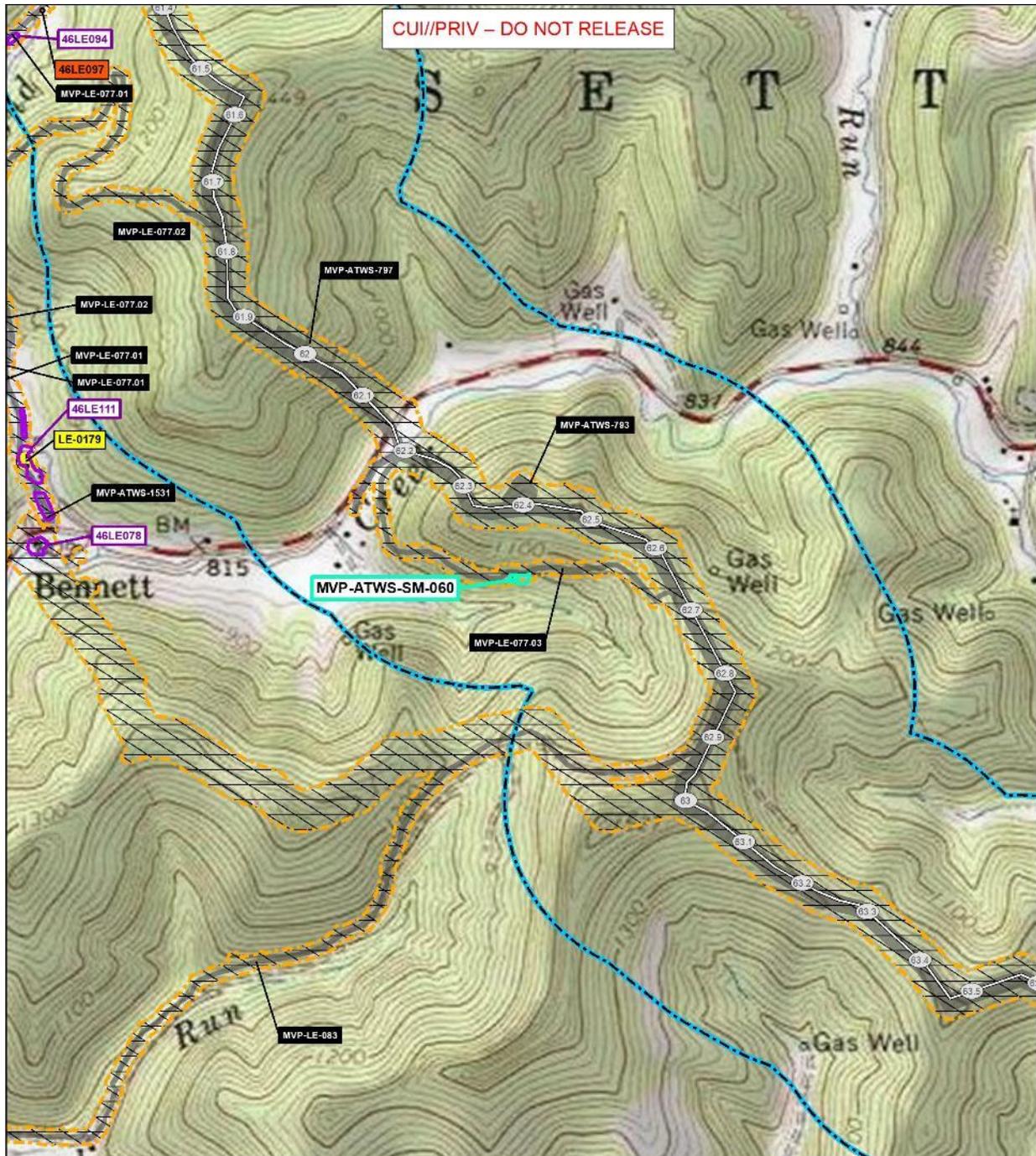
<b>Mountain Valley Pipeline Project</b>		NAD 1983 UTM 17N	1:2,250	0 50 100 200 Feet
<p><b>Figure 2: Detail of Variance MVP-ATWS-SM-021 (Ext)</b></p> <p><b>Wetzel County</b> FEBRUARY 2019</p>	Milepost Centerline MVP-ATWS-SM-021 (Ext) Pedestrian Survey Previous Archaeological Survey LOD (Previously Surveyed)			
	Data Sources: ESRI, USGS			



<b>Mountain Valley Pipeline Project</b>		NAD 1983 UTM 17N 1:2,250	0 50 100 200 Feet
<p><b>Figure 3: Detail of Variance MVP-ATWS-SM-026 (Ext)</b></p> <p><b>Wetzel County</b> FEBRUARY 2019</p>	Milepost Centerline MVP-ATWS-SM-026 (Ext) Pedestrian Survey Previously Recorded Archaeological Site Previous Archaeological Survey LOD (Previously Surveyed)		
	Data Sources: ESRI, USGS		







<b>Mountain Valley Pipeline Project</b> 		NAD 1983 UTM 17N 1:12,000	0 250 500 1,000 Feet
<b>Figure 6:</b> <b>Location of Variance</b> <b>MVP-ATWS-SM-060</b>  Lewis County FEBRUARY 2018		<ul style="list-style-type: none"> <li> Milepost</li> <li> Centerline</li> <li> MVP-ATWS-SM-060</li> <li> Previously Recorded Archaeological Site</li> <li> Previously Recorded Isolated Find</li> <li> Previously Recorded Architectural Resource</li> <li> Previous Archaeological Survey</li> <li> LOD (Previously Surveyed)</li> </ul>	<ul style="list-style-type: none"> <li> Indirect APE</li> </ul>
Data Sources: ESRI, USGS			



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MVP-ATWS-793

MVP-ATWS-SM-060

MVP-LE-077-03

<b>Mountain Valley Pipeline Project</b>		NAD 1983 UTM 17N	1:2,250	
<p><b>Figure 7: Detail of Variance MVP-ATWS-SM-060</b></p> <p><b>Lewis County</b> FEBRUARY 2018</p>	Milepost Centerline MVP-ATWS-SM-060 Pedestrian Survey Previous Archaeological Survey LOD (Previously Surveyed) Indirect APE			
	Data Sources: ESRI, USGS			



## **ATTACHMENT 2: PHOTOGRAPHS**



Photograph 1. Overview of MVP-ATWS-SM-021 (Ext), facing east.



Photograph 2. Overview of MVP-ATWS-SM-026(Ext), facing north.



Photograph 3. Overview of MVP-ATWS-SM-048 (Ext), facing north.



**Photograph 4. Overview of MVP-ATWS-SM-060, facing east.**