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January 8, 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
Proposed Laydown Yard MVP-LY-047– Documentation of Prior Disturbance
Request for Concurrence on No Further Survey Recommendation
DHR File# 2014-1194
FERC Docket CP16-10

Dear Mr. Kirchen:

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) located in 17 counties in West Virginia and Virginia. In compliance with the executed Programmatic Agreement for the Project, Tetra Tech has prepared this letter with documentation of prior disturbance of MVP-LY-047 laydown yard for review and comment by Virginia Department of Historic Resources (VDHR). Photographs and figures referenced below appear within Attachment 1 to this letter.

In December 2017, MVP identified a location in Narrows, Giles County, Virginia, which MVP proposes to use as a construction laydown yard (MVP-LY-047) (Figure 1). Use of the yard would be consistent with nearby surrounding industrial land use.

The Tetra Tech cultural team reviewed the Virginia Cultural Resource Information System (VCRIS) on December 5, 2017, for records of previously recorded cultural resources within the Area of Potential Effects (APE) for MVP-LY-047, which is equivalent to the yard's footprint. VCRIS indicated that there is one previously recorded archaeological site (44GS0013) within the proposed laydown yard (Figure 2). Site 44GS0013 was described by Howard MacCord in 1969 as an unspecified Woodland-period site located along the north bank of the New River. The site form refers to "chips, bones, shells, points, and sherds" collected at the site, without specific descriptions of these items. The VDHR has not evaluated site 44GS0013 for National Register of Historic Places (NRHP) eligibility. VCRIS indicated no records of previously recorded aboveground historic resources within the yard's APE.

Historical aerial photographs of the approximately 6.53-acre proposed yard were also reviewed. The earliest aerial dates to 1996 and shows the MVP-LY-047 yard location as a vegetated terrace of the New River (Figure 3). By 2008, significant ground disturbance is evident across the entire proposed laydown yard location (Figure 4). The horizontal extent of ground disturbance incorporates all of delineated site 44GS0013. The 2011 aerial shows the previous disturbance with what appears to be partial re-vegetation of weather-eroded ground surface (Figure 5).

A site visit to the yard location by Tetra Tech's archaeologist on December 20, 2017, confirmed that the MVP-LY-047 yard location has been severely disturbed. Four shovel tests (ST) were excavated to document the extent of disturbance. Each ST revealed the presence of highly compacted fill with angular gravel (Photograph 1); no cultural material was recovered. A heavy equipment push-pile is present in the center of the proposed laydown yard (Photograph 2). It does not appear on the older (1996 through 2009) aerial photographs archived on GoogleEarth, and does not represent a prehistoric-period mound.

There are no extant historic aboveground resources located within the MVP-LY-047 yard location.

In sum, the location of the proposed MVP-LY-047 construction laydown yard has undergone extensive previous ground-disturbing activity. The location has minimal potential to contain intact archaeological resources that would meet the criteria to be eligible to the NRHP. No further field investigation of the location is recommended. As noted above, there are no extant aboveground historic resources within the yard's location, and the temporary use of the yard during construction would not result in permanent indirect impacts on NRHP-eligible aboveground historic resources. No further archaeological or historic architectural survey of the location is recommended. MVP requests your concurrence with Tetra Tech's recommendation for no additional cultural resources investigation warranted within MVP-LY-047.

Please review this plan under Stipulation IV.A. in the executed Programmatic Agreement for the Project. This report will also be filed with the Federal Energy Regulatory Commission (FERC), 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, D.C. 20426

(202)502-8059
Paul Friedman @ferc.gov

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

Thank you for your attention.

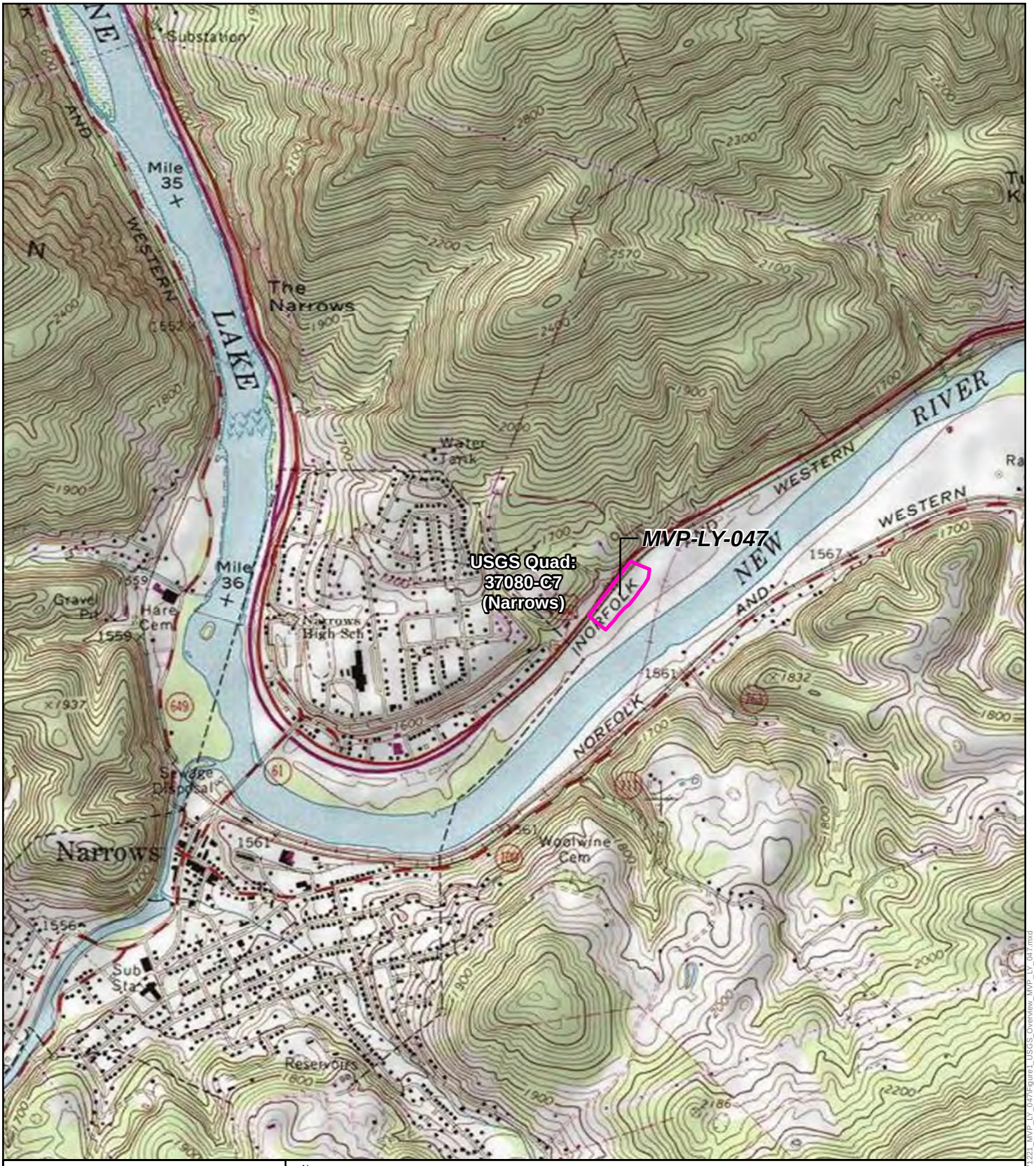
Sincerely,

Brian M. Clauto
Senior Environmental Coordinator

Attachment 1: Figures 1 through 5 and Photographs 1 through 2

cc: Evelyn Tidlow, GAI
Sean Sparks, Tetra Tech
Sydne Marshall, Tetra Tech
James Marine, Tetra Tech

Attachment 1
Figures and Photographs



Mountain Valley Pipeline Project

N

NAD 1983 UTM 17N

1:20,000

0 0.25 0.5 Miles

Mountain Valley PIPELINE

Legend

MVP-LY-047

USGS 7.5 Minute Topographic Quadrangle Boundary

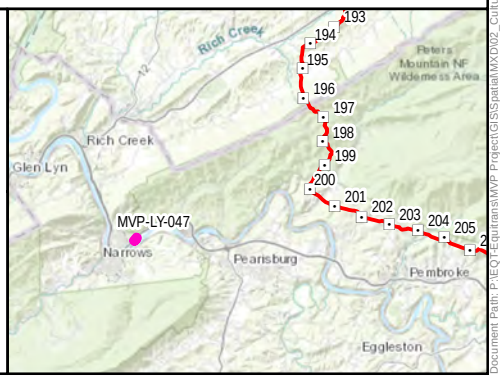


Figure 1
Location of MVP-LY-047

DECEMBER 2017

Data Sources: ESRI Streaming Data, 2014, Ventyx 2014, Appalachian Trail Conservancy, United States Department of Agriculture, National Park Service.

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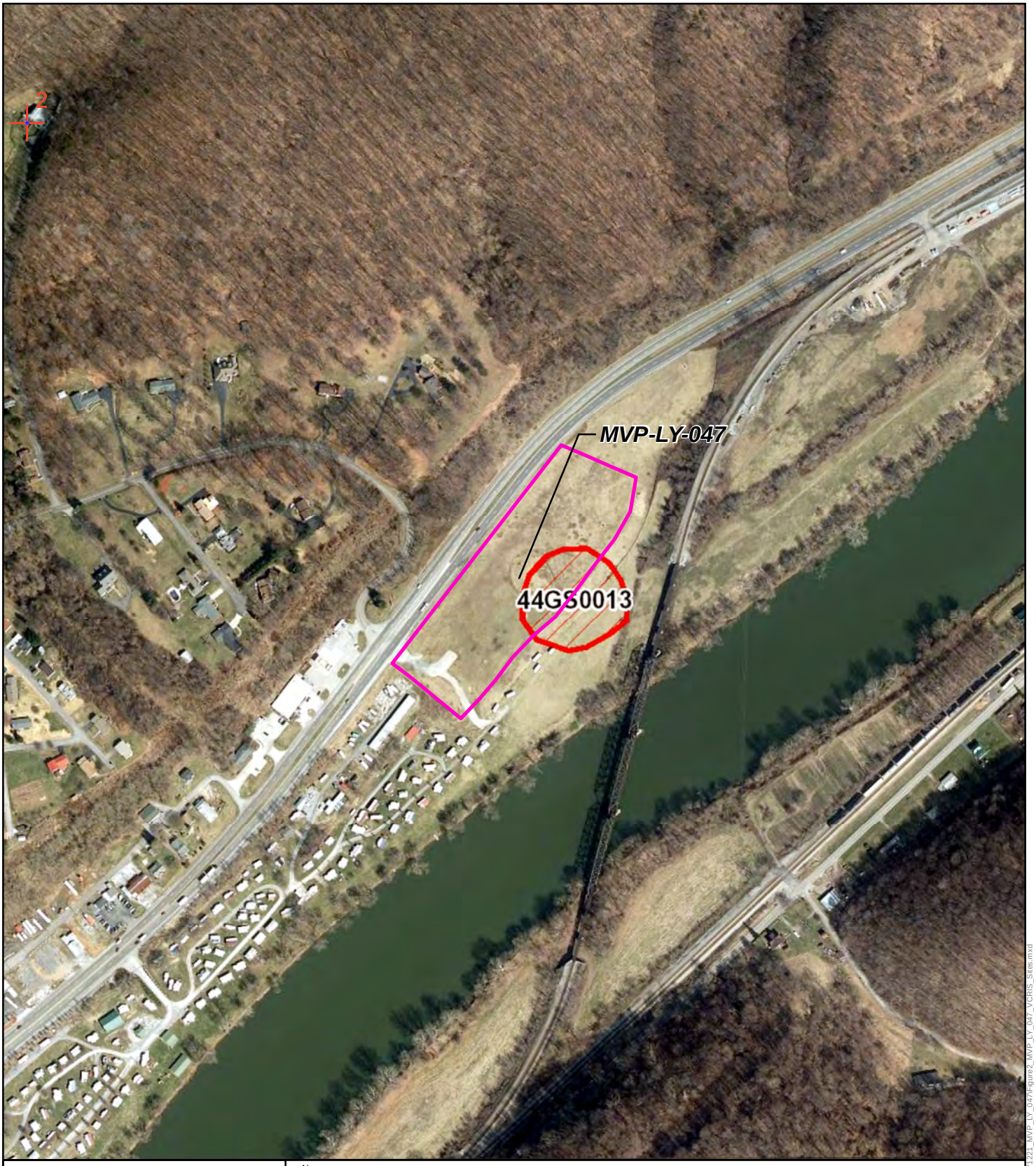

Mountain Valley Pipeline Project

N

NAD 1983 UTM 17N

1:5,000

0 0.05 0.1 Miles

Mountain Valley PIPELINE

Figure 2
Location of MVP-LY-047 and VCRIS Archaeological Resources

DECEMBER 2017

Data Sources: ESRI Streaming Data, 2014, Ventyx 2014, Appalachian Trail Conservancy, United States Department of Agriculture, National Park Service.

Legend

MVP-LY-047

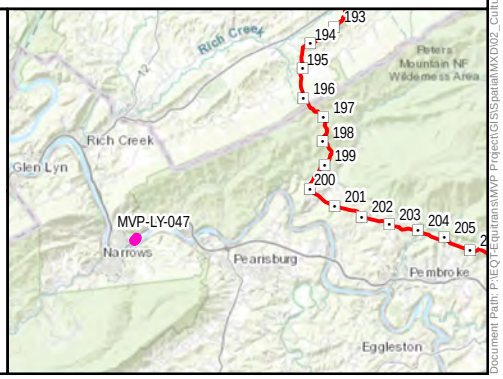

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Figure 3. Aerial photograph from 1996 showing proposed MVP-LY-047 yard location (outlined in red) in use as a vegetated river terrace. Source: GoogleEarth, accessed December 21, 2017.

Figure 4. Aerial photograph from 2008 showing proposed MVP-LY-047 Yard location (outlined in red) and extensive ground disturbance activity. Source: GoogleEarth, accessed December 21, 2017.

Figure 5. Aerial photograph from 2011 showing proposed MVP-LY-047 yard location (outlined in red), with partial re-vegetation of weather eroded ground surface. Source: GoogleEarth, accessed December 21, 2017.

Photograph 1. MVP-LY-047 laydown yard. Shovel Test J1, illustrating extant fill at the proposed yard.
Photographer: Jacob Freedman, December 20, 2017.

Photograph 2. MVP-LY-047. View to northeast. Note heavy equipment push-pile at center-rear of grass field. Photographer: Jacob Freedman, December 20, 2017.