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www.mountainvalleypipeline.info

May 11, 2018

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Mountain Valley Pipeline, LLC
Docket No. CP16-10-000
Supplemental Materials

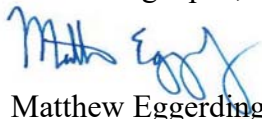
Dear Ms. Bose:

On October 13, 2017, the Federal Energy Regulatory Commission issued an order granting a Certificate of Public Convenience and Necessity to Mountain Valley Pipeline, LLC. In this filing, Mountain Valley submits the attached cultural report as supplemental materials.

If you have any questions, please do not hesitate to contact me at (412) 553-5786 or meggerding@eqt.com. Thank you.

Respectfully submitted,

MOUNTAIN VALLEY PIPELINE, LLC
by and through its operator,
EQM Gathering Opco, LLC

By: 

Matthew Eggerding
Senior Counsel, Midstream

Attachment

cc: All Parties
Paul Friedman, OEP
Lavinia DiSanto, Cardno, Inc.
Doug Mooneyhan, Cardno, Inc.



May 11, 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 080-5739
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, SEARCH is providing herein a National Register of Historic Places (NRHP) evaluation of a historic architectural resource, Virginia Department of Historic Resources (VDHR) No. 080-5739, on Green Hollow Drive in Roanoke County, Virginia, within the direct Area of Potential Effects (APE) of the Mountain Valley Pipeline Project (MVP) (**Figure 1**). This resource, comprising a rock push pile, was located during follow-up reconnaissance survey on the Chandler properties (Parcels VA-RO-60 and VA-RO-61; Mile Post [MP] 244.92 to MP 245.36; **Figures 1 and 2**).

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 feature. Work in the area will not resume until the Environmental Inspector grants clearance. The resource assessment was conducted by a qualified archaeologist (Kelly Hockersmith of SEARCH) and an architectural historian (Hannah Dye of Tetra Tech). The results of this assessment are presented below. This resource will be avoided and protected during construction. We request your expedited review of the eligibility and avoidance plan for this resource. Figures and photographs referenced in the text are included as **Attachment 1** to this letter. **Attachment 2** is the VDHR Architectural Survey Form for Architectural Resource 080-5739.

Architectural Resource 080-5739 is located within previously recorded Bent Mountain Apple Orchard and Bent Mountain Rural Historic Districts. SEARCH recommends that 080-5739 is not individually eligible for listing in NRHP or as a contributing resource to a larger historic resource or historic district.



Rock Push Pile (MP 244.94)
Green Hollow Drive
Bent Mountain, Roanoke County
VDHR No. 080-5739
Tax ID No. 111.00-01-62.01-0000

Background

The Cheyenne River Sioux Tribe's Tribal Historic Preservation Officer (THPO), Mr. Steve Vance, wrote a letter to the Federal Energy Regulatory Commission (FERC), dated March 18, 2018, indicating that he had visited several of the properties crossed by the MVP Pipeline and identified occupation sites, encampments, villages, and sites of ceremonial activity. The THPO for the Rosebud Sioux Tribe, Mr. Ben Rhodd, in letters dated March 9 and March 23, 2018, to the Advisory Council on Historic Preservation (ACHP), indicated that he had visited the project area with Mr. Vance and was in agreement about the presence of sites within the limits of disturbance (LOD) for the project.

In letters dated March 13, April 11, and April 12, 2018, Mr. and Mrs. Chandler reported to the FERC that the THPOs had visited their property and identified a site. As a result, Mountain Valley requested that SEARCH and Tetra Tech conduct a follow-up reconnaissance survey on these properties.

Pedestrian survey and visual reconnaissance of the Chandler properties were conducted by archaeologists Kelly Hockersmith (SEARCH) and Adam Maskevich (Tetra Tech) on April 24 and April 26, 2018. The direct APE in this area was previously surveyed in 2016 (Tetra Tech 2017). A summary of the Phase I archaeology survey results in the vicinity of the rock push pile is shown in **Figure 2**, adapted from Appendix A (Figure A-188) of *Mountain Valley Pipeline Project, Phase IB Archaeological Survey Report, Addendum I, Roanoke and Montgomery Counties, Virginia* (Tetra Tech January 2017). This survey did not identify any archaeological deposits in the vicinity of the rock push pile.

Results

Re-survey of the Chandler properties resulted in the identification of a single rock push pile (080-5739) located within the LOD along the pipeline corridor near MP 244.94 and approximately 135 feet (41.1 meters) south of Mill Creek within a lightly wooded area (**Photograph 1**; see **Figure 2**). A site plan for the resource is depicted in **Figure 3**. The feature is an ovoid rock push pile that measures 15.4 feet (4.7 meters) east/west by 7.9 feet (2.4 meters) north/south and piled 19.6 inches (50 centimeters) high. The piled rocks are covered in moss and are only visible in the western half of the pile (**Photograph 2**), while the eastern half is mounded with dirt covered with leaves. A downed tree sits across the eastern half of the pile (**Photograph 3**). GPS points were collected for the rock push pile and protective fencing (**Photograph 4**) was placed around it. This rock push pile is interpreted as the cultural feature reported to the FERC and ACHP in the correspondence discussed above.



It is SEARCH's opinion that the rock push pile was created as the result of historic field clearing. This opinion is based on historic aerial imagery of the surrounding area. Review of historic aerial imagery (US Department of Agriculture [USDA] 1947; **Figure 4**) indicates that areas to the south and east of the rock push pile were cleared for agricultural activity sometime prior to 1947. The generally rocky character of the landform makes it likely that agricultural land use would have required some removal of surficial stone (for example, see **Photograph 5**). Following clearing, it is likely that rock was removed from the fields to facilitate plowing. As shown in **Figure 4**, a thin line of trees was left in place between the field and Mill Creek, most likely to prevent erosion of the soils from the field into Mill Creek. The rock push pile is located approximately 135 feet (41.1 meters) south of Mill Creek along the edge of the tree line bordering the cleared field shown in **Figure 4**, the logical location to pile cleared rocks.

Historical aerial imagery dating to 1956 and 1972 (**Figures 5 and 6**) show the vicinity of the rock push pile as reverting to a lightly wooded area. No historic-era structures were located close to the rock push pile according to the aerial photographs. No historic material was noted within or around the rock push pile. The area south of the rock push pile was previously shovel tested by Tetra Tech in 2016 (see **Figure 2**), and no sub-surface cultural material or features were observed. In summary, the rock push pile is recommended as not eligible for listing in the NRHP.

Although SEARCH is recommending the rock push pile as not eligible for the NRHP, Mountain Valley will avoid impacts on 080-5739 as shown in **Figure 7**. A 10-foot (3-meter) buffer has been placed around the site, and jersey barriers will be installed prior to construction to protect the rock push pile from inadvertent impacts during construction. The location of the pipeline has been shifted slightly east to allow construction within the current LOD.

Mountain Valley 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 FERC. 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 email at e.tidlow@gaiconsultants.com. Thank you for your attention.

Sincerely,

Jacob A. Freedman, MA
Project Manager

Attachments

Attachment 1: Figures and Photographs

Attachment 2: VDHR Architectural Survey Form

Cc: Megan Neylon, EQT

Evelyn Tidlow, GAI

James and Kathy Chandler

Ben Rhodd, THPO Rosebud Sioux Tribe

Steve Vance, THPO Cheyenne River Sioux Tribe

Eric Oosawahee-Voss, THPO United Keetoowah Band of Cherokee Indians in Oklahoma

Karen Pritchett, Assistant THPO United Keetoowah Band of Cherokee Indians in Oklahoma

Cynthia Stacy, NAGPRA Special Projects Manager Peoria Tribe of Indians of Oklahoma

Bryan Printup, Cultural Preservation Tuscarora Nation

Nekole Alligood, Delaware Nation Cultural Preservation Director

Miranda Panther, NAGPRA Officer Eastern Band of Cherokee Indians

Russell Townsend, THPO Eastern Band of Cherokee Indians

Holly Austin, THPO Eastern Band of the Cherokee Indians

Travis Patton, Interim THPO Eastern Shawnee Tribe of Oklahoma

Bill John Baker, Principal Chief and THPO Cherokee Nation of Oklahoma

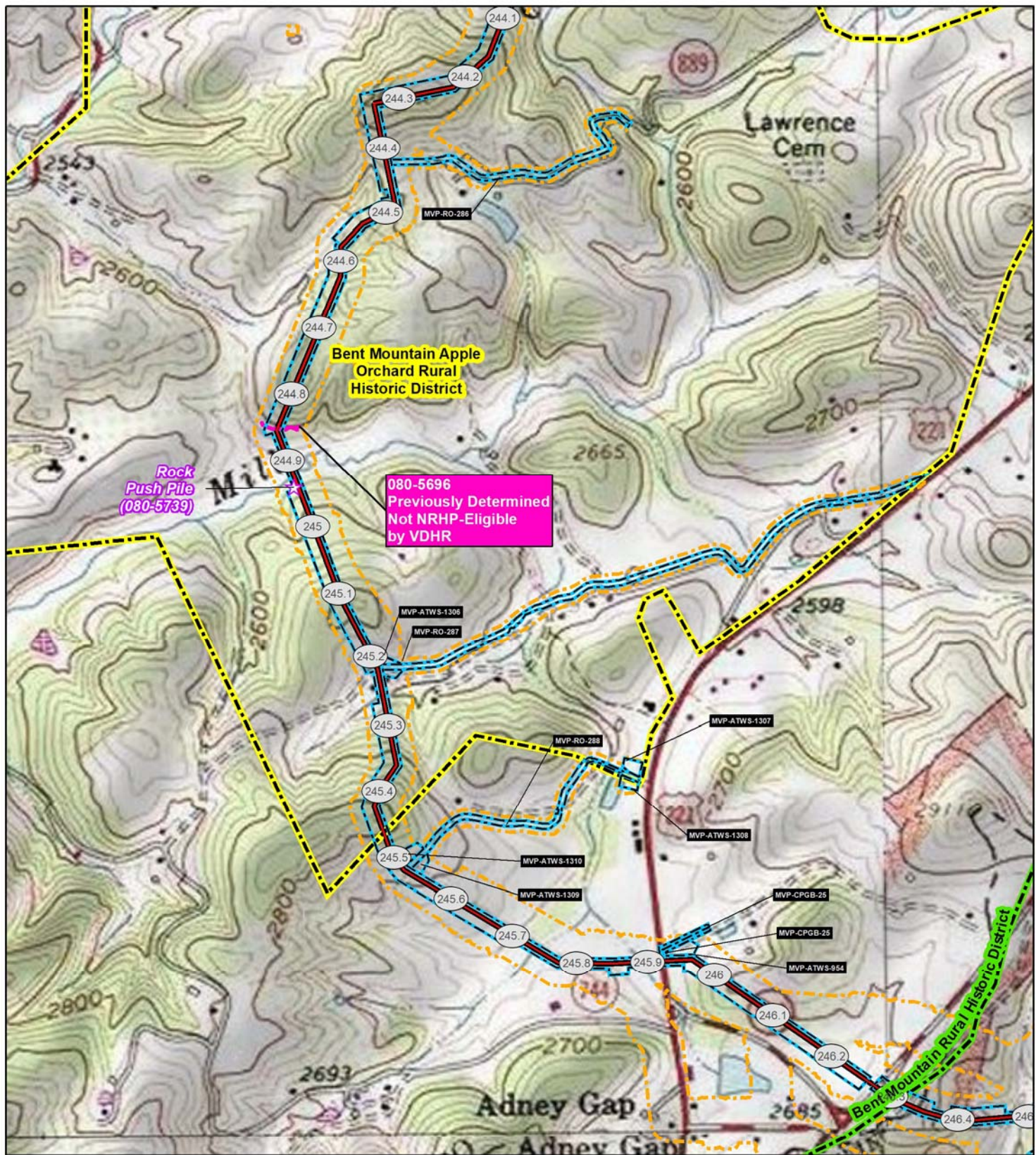
Elizabeth Toombs, Special Projects Officer Cherokee Nation of Oklahoma

Dr. Wenonah G. Haire, THPO and Director Catawba Indian Nation

Caitlin Thotherow, THPO Catawba Indian Nation



ATTACHMENT 1
FIGURES AND PHOTOGRAPHS



Mountain Valley Pipeline Project



NAD 1983 UTM 17N

1:12,000

0 250 500 1,000 Feet

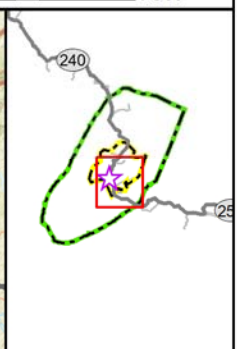
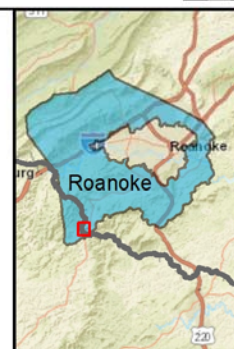


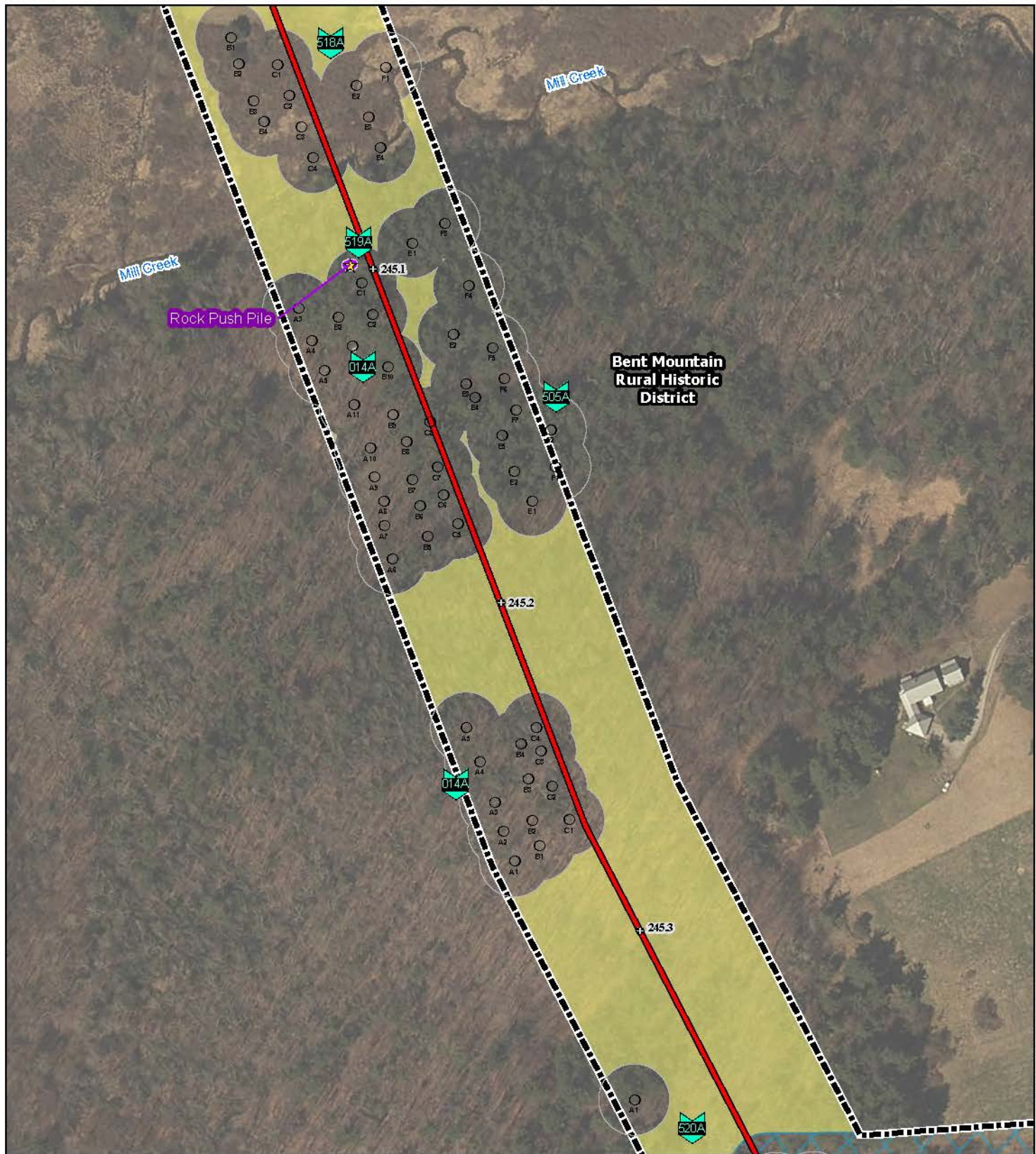
Figure 1:
Location of
Rock Push Pile (080-5739)

Roanoke County
MAY 2018

Data Sources: ESRI, USGS

- Milepost
- Centerline
- Historic Resource
- Rock Push Pile (080-5739)
- Bent Mountain Apple Orchard Rural Historic District
- Bent Mountain Rural Historic District
- Archaeological Survey Coverage
- LOD





Mountain Valley Pipeline Project



NAD 1983 UTM 17N

0 100 200 400 Feet



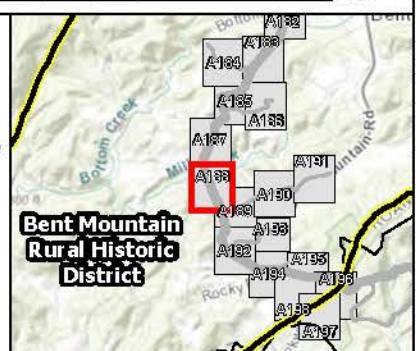
Figure 2:
Adapted from Appendix A of Addendum 1
Shovel Test Results
Montgomery and Roanoke
A188 of A189

January 2017
Updated May 2018

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

- Negative ST
- ATL Guide
- ⊕ Milepost
- October 2016 Proposed Route
- Rock Push Pile (080-5739)
- ★ Centerpoint of the Rock Push Pile
- ▭ Historic District Boundary
- ▭ Survey Boundary
- ▭ Pedestrian Survey
- ▭ Previously surveyed as part of MVP
- ▭ County Boundary

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



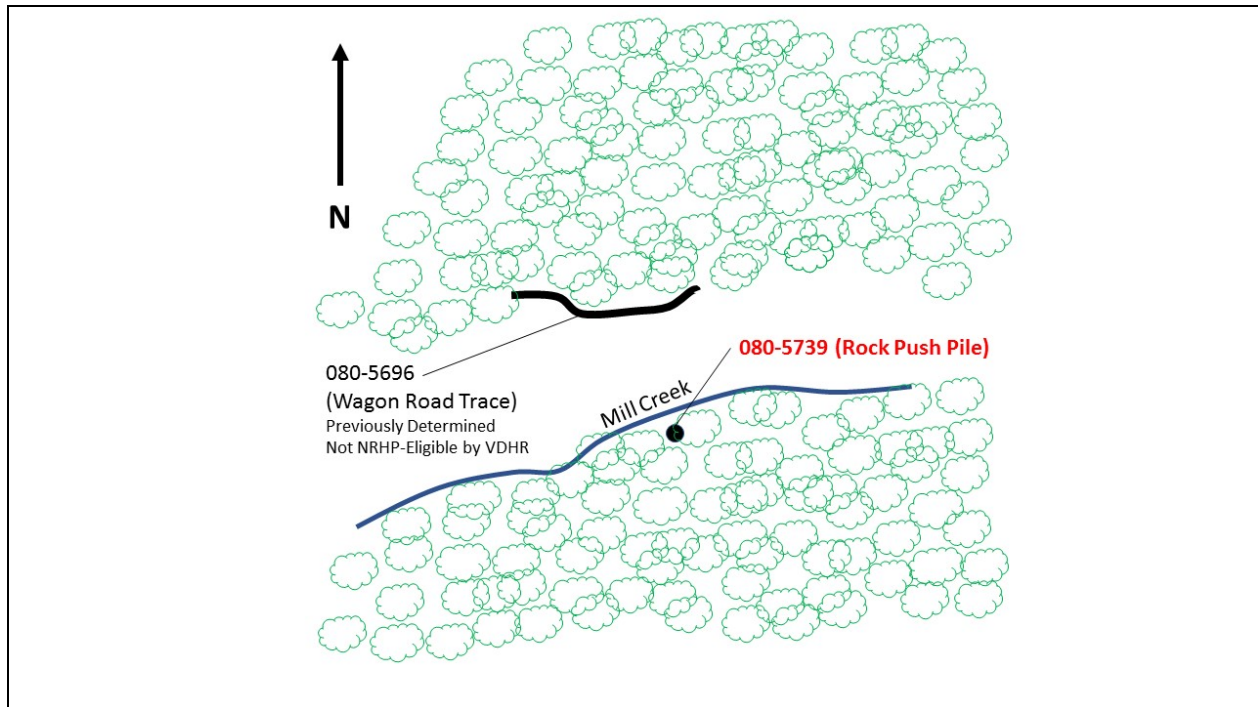
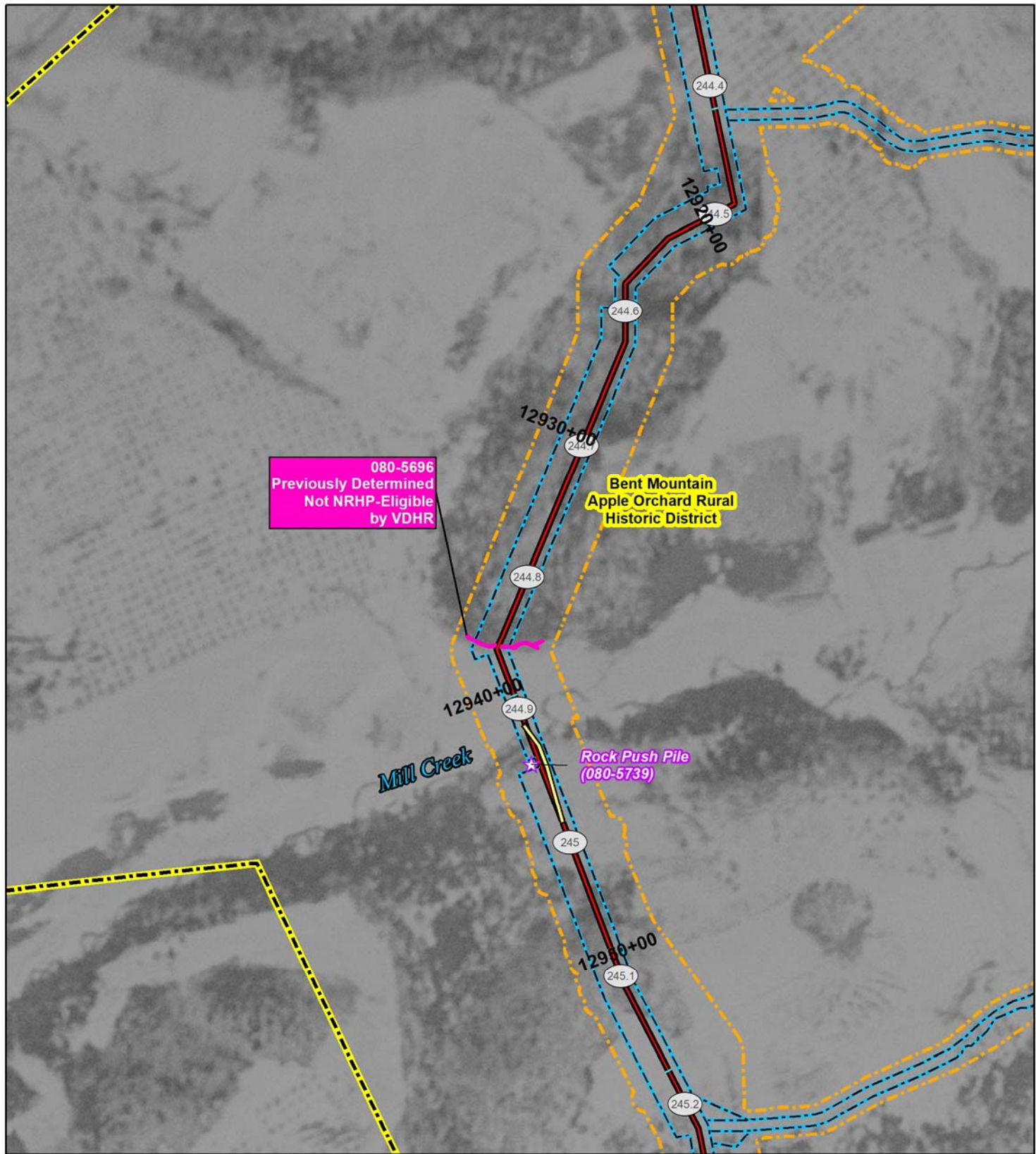


Figure 3. Site plan, Rock Push Pile, Green Hollow Drive, Bent Mountain, Roanoke County.



Mountain Valley Pipeline Project



NAD 1983 UTM 17N

1:6,000

0 125 250 500
Feet

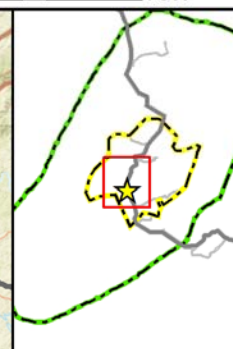
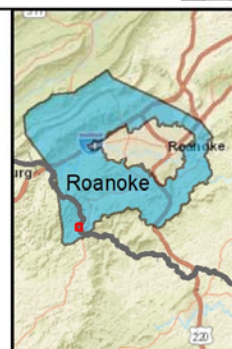


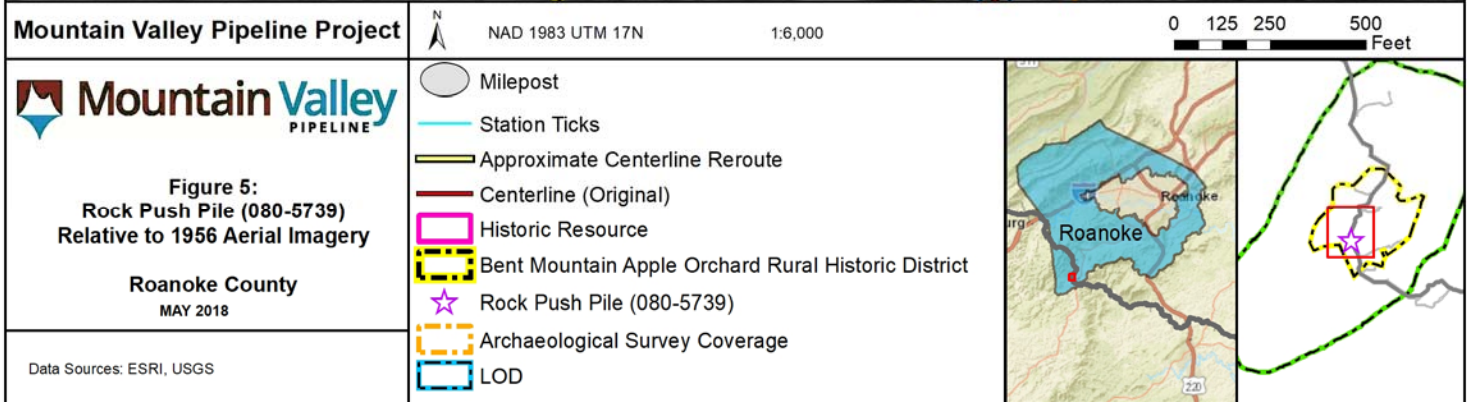
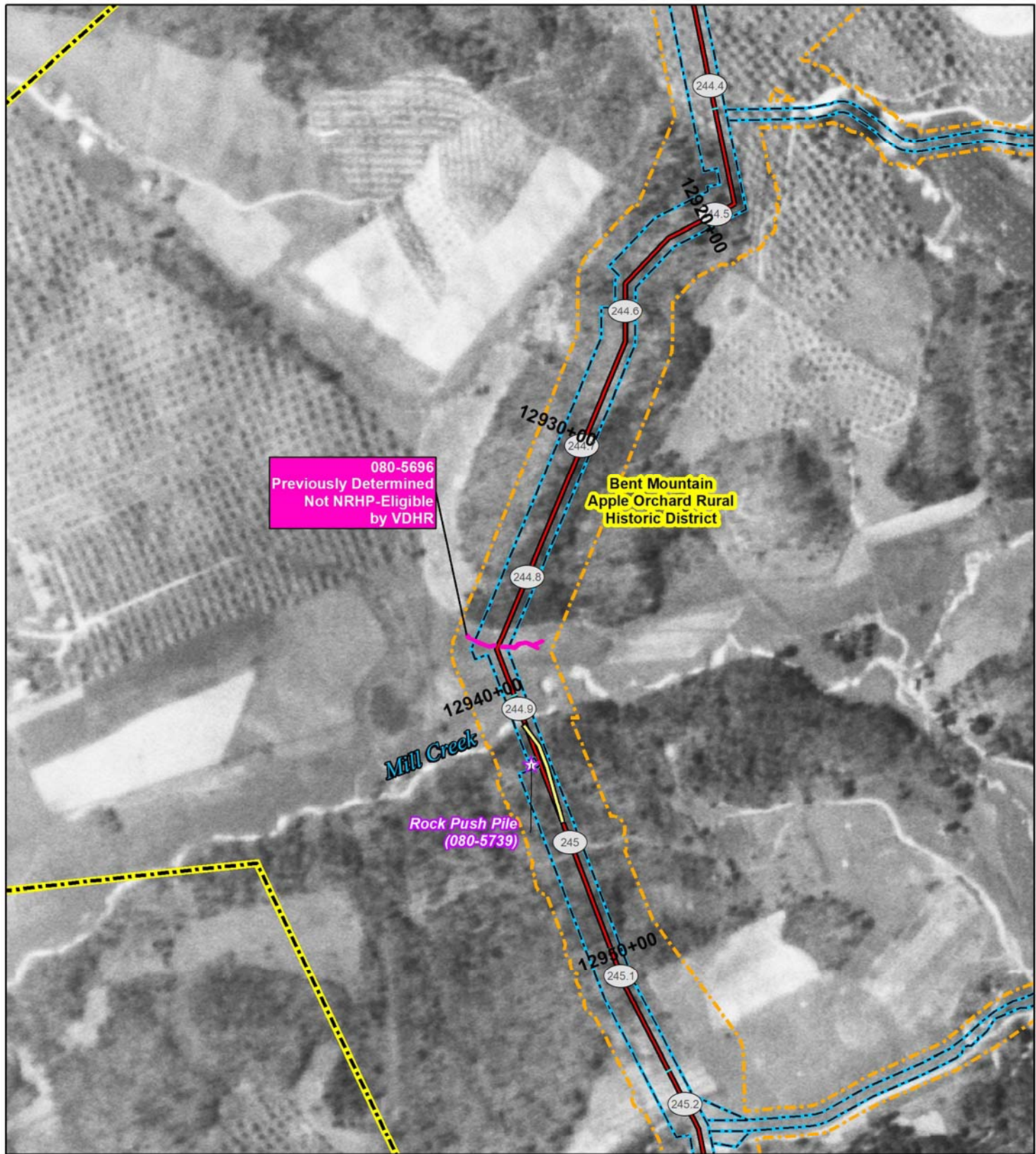
Figure 4:
Rock Push Pile (080-5739)
Relative to 1947 Aerial Imagery

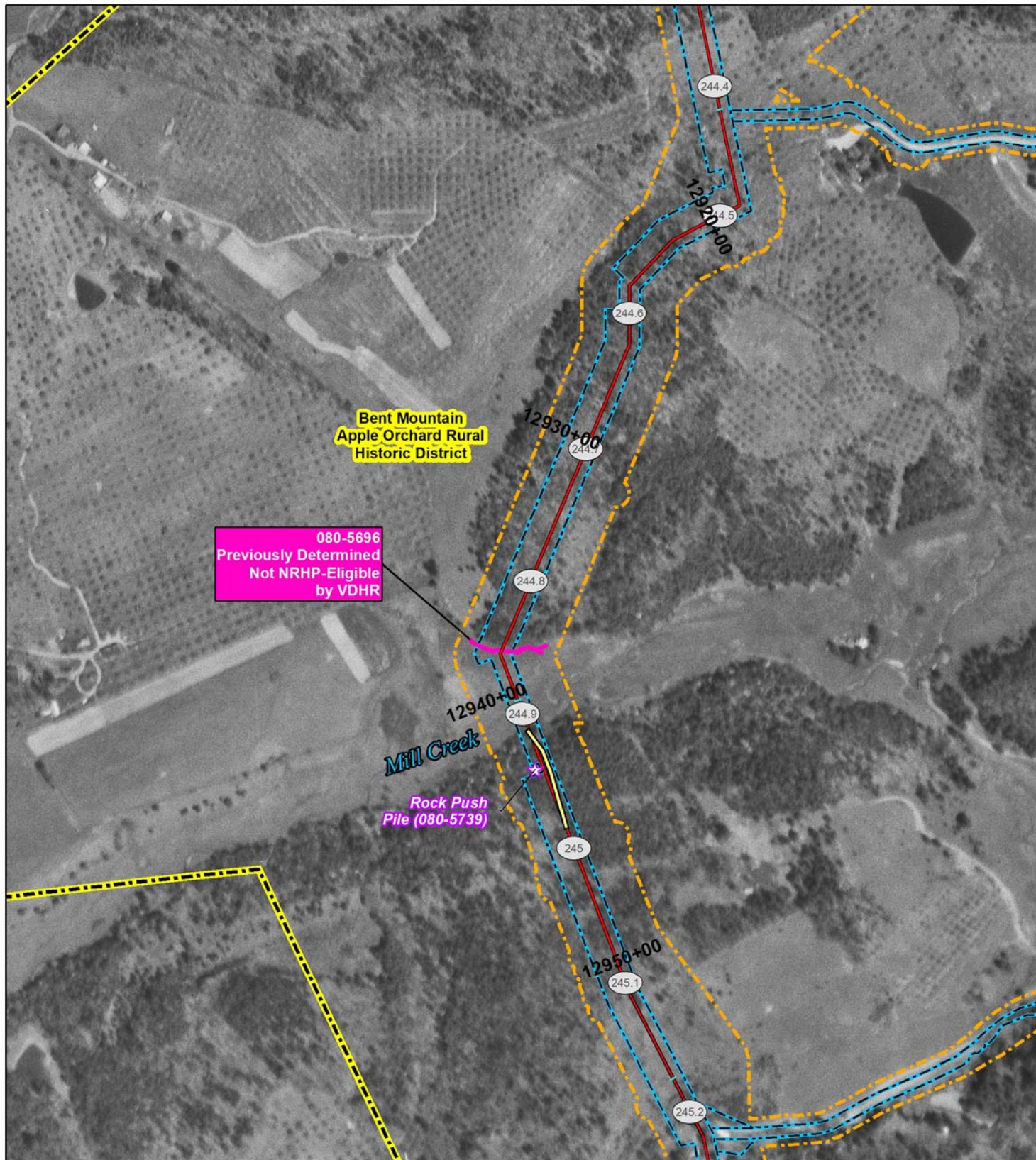
Roanoke County
MAY 2018

Data Sources: ESRI, USGS

- Milepost
- Station Ticks
- Approximate Centerline Reroute
- Centerline (Original)
- Historic Resource
- Bent Mountain Apple Orchard Rural Historic District
- Rock Push Pile (080-5739)
- Archaeological Survey Coverage
- LOD







Mountain Valley Pipeline Project



NAD 1983 UTM 17N

1:6,000

0 125 250 500 Feet

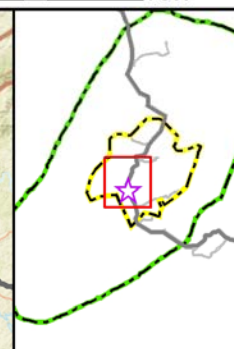
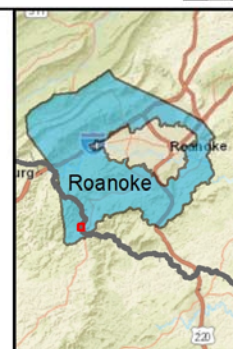


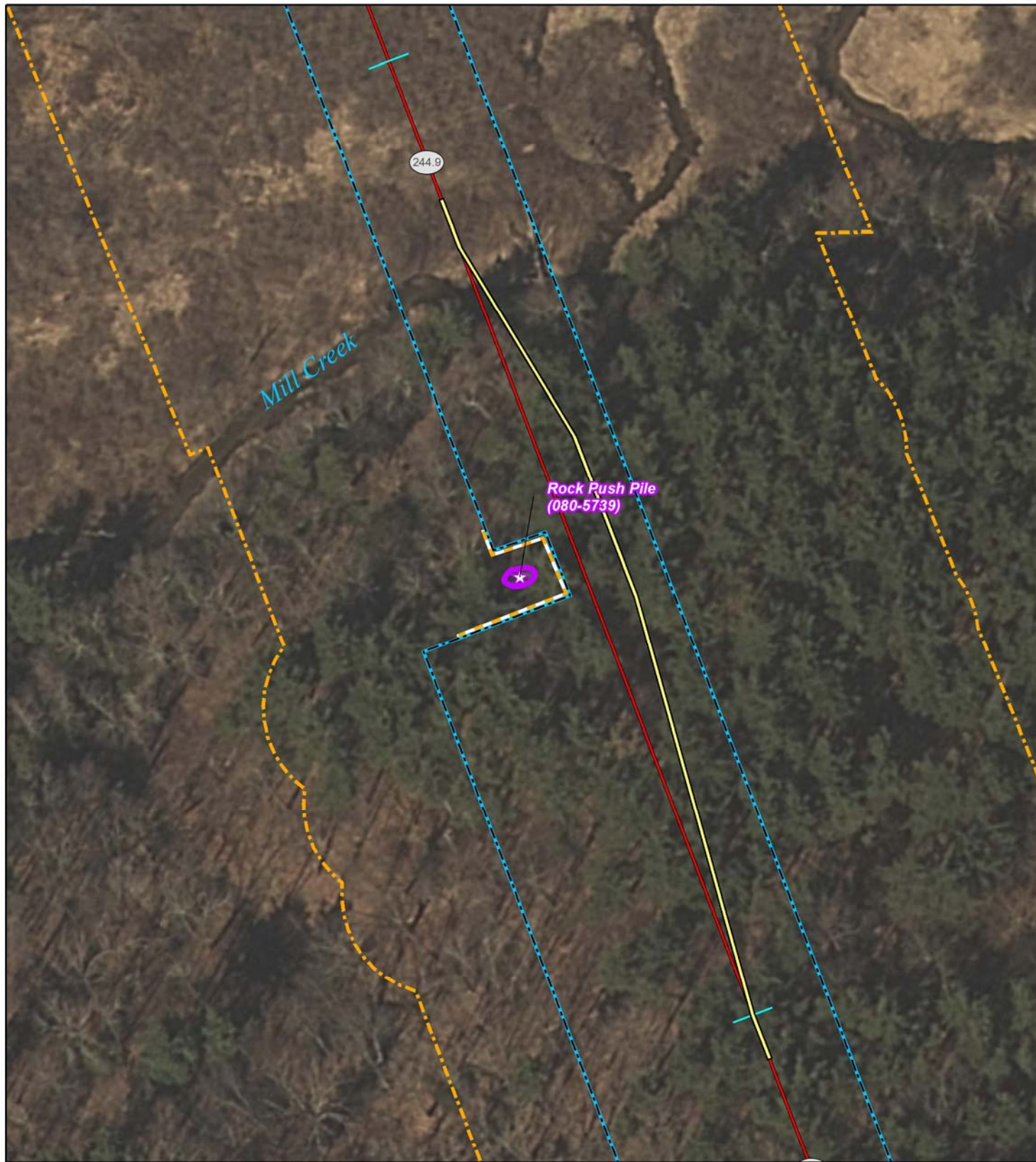
Figure 6:
Rock Push Pile (080-5739)
Relative to 1972 Aerial Imagery

Roanoke County
MAY 2018

Data Sources: ESRI, USGS

- Milepost
- Station Ticks
- Centerline (Original)
- Approximate Centerline Reroute
- Historic Resource
- Bent Mountain Apple Orchard Rural Historic District
- Rock Push Pile (080-5739)
- Archaeological Survey Coverage
- LOD





Mountain Valley Pipeline Project



NAD 1983 UTM 17N

1:800

0 25 50 100 Feet

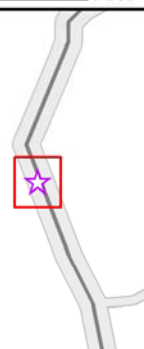


**Figure 7: Avoidance Plan
Rock Push Pile (080-5739)
Roanoke County, VA**

May 2018

Data Sources: ESRI, USGS

- Milepost
- Station Ticks
- Centerline (Original)
- Approximate Centerline Reroute
- Jersey Barrier
- Centerpoint of Rock Push Pile
- Rock Push Pile (080-5739)
- Archaeological Survey Coverage
- LOD





Photograph 1. View of rock push pile, looking northwest.



Photograph 2. View of the western half of the rock push pile, looking east.



Photograph 3. View of the eastern half of the rock push pile, looking west.



Photograph 4. Fencing surrounding rock push pile, looking northwest.



Photograph 5. View of exposed bedrock within the LOD near MP 245.1, looking south.



ATTACHMENT 2
VDHR ARCHITECTURAL SURVEY FORM

Property Information

Property Names

Name Explanation	Name
Descriptive	Rock Pile

Property Evaluation Status

Not Evaluated

Property Addresses

Current - 10858 Green Hollow Drive

County/Independent City(s):	Roanoke (County)
Incorporated Town(s):	No Data
Zip Code(s):	24059
Magisterial District(s):	No Data
Tax Parcel(s):	No Data
USGS Quad(s):	ELLISTON

Additional Property Information

Architecture Setting: Rural

Acreage: No Data

Site Description:

April 2018: Survey activities resulted in the identification of a single rock push pile located and approximately 135 feet (41.1 meters) south of Mill Creek within a lightly wooded area.

Surveyor Assessment:

April 2018: Recommended Not Eligible

Surveyor Recommendation: Recommended Not Eligible

Ownership

Ownership Category	Ownership Entity
Private	No Data

Primary Resource Information

Resource Category:	Other
Resource Type:	Other
Date of Construction:	No Data
Historic Time Period:	No Data
Historic Context(s):	Other
Architectural Style:	No Data
Form:	No Data
Number of Stories:	No Data
Condition:	Demolished
Interior Plan:	No Data
Threats to Resource:	Development, Other, Public Utility Expansion

Architectural Description:

April 2018: The rock pile is interpreted as a result of historic field clearing and grading activity. This interpretation is evidenced by the observation of young secondary growth and push pile observed along its eastern margin. In addition, the generally rocky character of the landform makes it likely that agricultural land use would have required some level of grading and removal of surficial stone.

The feature is an ovoid push pile that includes a pile of rocks, and measures 15.4 feet (4.7 meters) east/west by 7.9 feet (2.4 meters) north/south and piled 19.6 inches (50 centimeters) high. The piled rocks are covered in moss and are only visible in the western half of the pile while the eastern half is mounded with up dirt covered with leaves. A downed tree sits across the eastern half of the pile

Secondary Resource Information

Secondary Resource #1

Resource Category: *No Data*
Resource Type: *No Data*
Architectural Style: *No Data*
Form: *No Data*
Date of Construction: *No Data*
Condition: *No Data*
Threats to Resource: *No Data*
Architectural Description:
No Data

Historic District Information

Historic District Name: *No Data*
Local Historic District Name: *No Data*
Historic District Significance: *No Data*

CRM Events

Event Type: Survey:Phase I/Reconnaissance

Project Review File Number: 2014-1194
Investigator: Gail Hellman
Organization/Company: Tetra Tech, Inc.
Sponsoring Organization: *No Data*
Survey Date: 4/24/2018
Dhr Library Report Number: *No Data*
Project Staff/Notes:
Rock Pile identified following survey for the Mountain Valley Pipeline Project

Bibliographic Information

Bibliography:

No Data

Property Notes:








No Data

Project Bibliographic Information:

Mountain Valley Pipeline Architectural Resource Late Discover: VDHR Resource Number 080-5739 (May 2018)



Legend

-  Architecture Resources
-  Architecture Labels
-  Individual Historic District Properties
-  Archaeological Resources
-  Archaeology Labels
-  USGS GIS Place names
-  County Boundaries



Feet

0 50 100 150 200
1:2,500 / 1"=208 Feet

Title: Architecture Labels

Date: 5/9/2018

DISCLAIMER: Records of the Virginia Department of Historic Resources (DHR) have been gathered over many years from a variety of sources and the representation depicted is a cumulative view of field observations over time and may not reflect current ground conditions. The map is for general information purposes and is not intended for engineering, legal or other site-specific uses. Map may contain errors and is provided "as-is". More information is available in the DHR Archives located at DHR's Richmond office.

Notice if AE sites: Locations of archaeological sites may be sensitive the National Historic Preservation Act (NHPA), and the Archaeological Resources Protection Act (ARPA) and Code of Virginia §2.2-3705.7 (10). Release of precise locations may threaten archaeological sites and historic resources.