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@gacconsultants.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,

[Signature]

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 Oosawahhee-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
Figure 2:
Adapted from Appendix A of Addendum 1
Shovel Test Results
Montgomery and Rosnowe
A186 of A189
January 2017
Updated May 2018

Mountain Valley Pipeline Project

- Negative ST
- ATL Guide
- Milepost
- October 2016 Proposed Route
- Rock Push Pile (080-5739)

Legend:
- Centerpoint of the Rock Push Pile
- Historic District Boundary
- Survey Boundary
- Pedestrian Survey
- Previously surveyed as part of MVP
- County Boundary

Data Sources:
- GRI, USGS, MDNR, NPS, USDA

Notes:
- ATL = Archaeological Test Location
- ST = Shovel Test
- Red = Areas outside survey boundary under project consideration
Figure 3. Site plan, Rock Push Pile, Green Hollow Drive, Bent Mountain, Roanoke County.
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.
Property Information

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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: Private
  - Ownership Entity: 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

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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) |
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.