



September 22, 2022

Via Electronic Filing Only (FERC Docket Nos. CP16-10-000 and CP21-57-000)

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

Re: Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
FERC Docket Nos. CP16-10-000 and CP21-57-000
Response to Continued Claims Regarding Project Emissions

To Secretary Bose:

Mountain Valley Pipeline, LLC (Mountain Valley) submits this letter to respond to the continued advancement of false claims by opponents of the Mountain Valley Pipeline (MVP) project regarding greenhouse gas (GHG) emissions. These misleading and inaccurate statements have unfortunately been repeated by media outlets and elected officials without any independent research or fact checks. Further, this is not the first time that project opponents have attempted to spread misinformation in support of their singular agendas. Mountain Valley originally addressed these misleading GHG emissions claims in a response dated October 6, 2021, which was made on the public record.¹

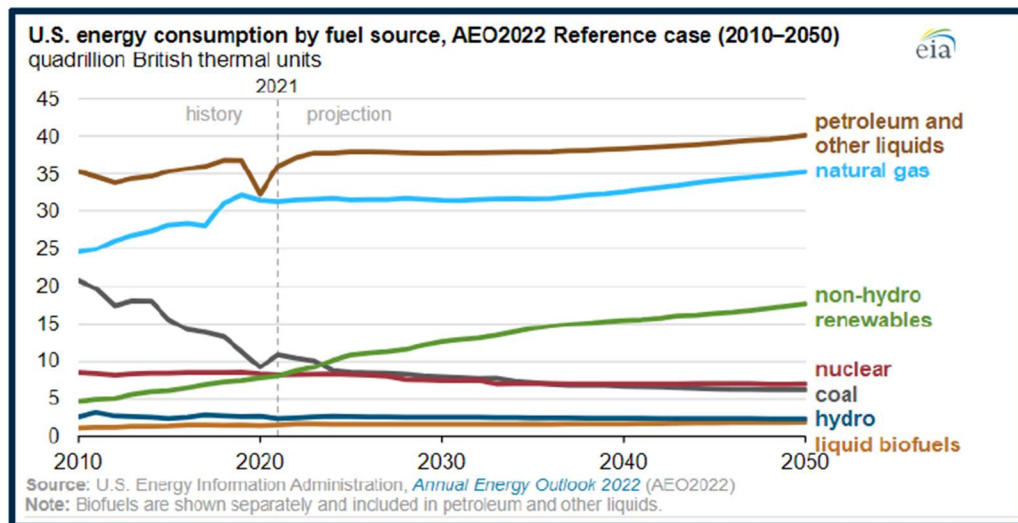
Achieving common ground through objective sources

Mountain Valley appreciates that there are differing views on energy policy. More importantly, Mountain Valley supports the science behind climate change and acknowledges the need to reduce GHG emissions. As the efficient development of renewable energy sources accelerates, natural gas has been, and will remain, critical in providing reliable and affordable energy to meet the growing demands of the region – and even more specifically as our nation transitions to a lower-carbon future. A reasonable dialogue can only take place if there is common ground for the objective facts in this discussion. Unfortunately, our project opponents refuse to acknowledge the immediate benefits of and need for a reliable natural gas supply to reduce our country's GHG emissions and ensure national energy security, despite the collective acknowledgement of this fact by most objective observers.

¹ Mountain Valley Pipeline, LLC, "Response to Claims Regarding Pipeline Emissions," Oct. 6, 2021. Available at: https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20211006-5019.

Rather than rely on objective sources, opposition voices continue to rely on claims made by their own policy advocates. These claims do not survive scrutiny because they are based on an unsupported methodology that intentionally uses extreme inputs to develop pre-determined conclusions that are not accepted by any established (or unbiased) “science community.” While we welcome their contribution to the overall discussion on energy policy, we believe that advocacy organizations whose stated purpose is “to stop fossil fuel infrastructure projects”² cannot be considered a reliable source in this debate.

The U.S. Energy Information Administration (EIA) represents a more objective source for a common ground discussion, which includes readily available data and information. Here, the EIA not only projects a significant rise in renewables through 2050 but also an increase in our nation’s reliance on natural gas.



MVP's GHG emissions – fact vs. fiction

The MVP can ensure a reliable, secure, and safe supply of natural gas while also delivering benefits to a lower-carbon future. Those who oppose fossil fuels and related infrastructure have reported that MVP's annual pipeline emissions will be equivalent to 37 coal plants or over 27 million cars; however, these are unfounded claims and are not supported by fact. The facts about MVP’s GHG emissions are already part of the public record. The emissions associated with the operation of MVP are estimated to be 632,000 metric tons of CO₂ equivalent units annually, and this information has been provided in the Project’s regulatory air permits and in an Environmental Impact Statement that was affirmed by the court on appeal. According to the emission calculator maintained by the U.S. Environmental Protection Agency (another credible source of information for a common ground discussion), MVP’s annual emissions are roughly equivalent to the emissions from 80,000 homes or 136,000 gasoline powered cars or 0.17 of a single coal plant each year.³

² Oil Change International, Overview of Work. Available at: <http://priceofoil.org/program-areas/united-states/>.

³ See EPA website Greenhouse Gas Calculator at <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>.

Interestingly, project opponents steadfastly refuse to acknowledge Mountain Valley's ground-breaking plan to offset operational emissions, which will begin at the in-service date and continue for the initial 10 years of operations.⁴ Under this proposal, MVP's net operational emissions will be zero and the operations will be carbon neutral for the first 10 years. Upon full implementation of its carbon offset plan, Mountain Valley would become one of the nation's first, large-scale, interstate natural gas transmission pipelines to achieve *net zero* carbon neutrality for operational emissions. We understand that compromises need to be made between differing views if we are going to achieve a national energy policy that delivers reliable and safe energy while pursuing a lower carbon future. The failure of the opposition groups to acknowledge the forward societal progress of a major energy infrastructure project that has already accounted for its Scope 1 and Scope 2 emissions⁵ as part of its life cycle undermines the credibility of their position.

Opponents have also mischaracterized the relationship of the project's Scope 3 emissions.⁶ Their attribution of *all* Scope 3 emissions (indirect emissions throughout the value chain, including those by end users of the natural gas, whether by electric generation, consumers, or manufacturers) to Mountain Valley is a flawed concept. Even if Mountain Valley never supplied a molecule of gas, today these users are procuring and will continue to procure natural gas from other more expensive and likely less reliable sources or are using higher GHG emitting sources like coal for power generation – all which produce these same “Scope 3” GHG emissions today.⁷

Supporting the transition to a lower-carbon future

As referenced above, there is a large segment of power generation in the Southeast region of the U.S. that still relies heavily on coal and would need the supply of natural gas provided by MVP to effectuate an immediate transition away from coal. Project opponents conveniently ignore the well-established fact that the displacement of coal by natural gas in power generation achieves an ***immediate 43% reduction*** of net greenhouse gas emissions, primarily due to the high carbon content of coal.⁸

The deployment of the transported natural gas from MVP to the Southeastern and mid-Atlantic states has the exciting potential to drastically reduce carbon dioxide emissions by displacing coal at generating facilities and at industrial power plants (e.g. boilers). Co-firing or complete fuel switching from coal to natural gas generation offers a positive and impactful solution for our citizens and the environment. If we used a 1:1 factor for displacing coal with natural gas, based on energy output, the Mountain Valley can eliminate over 54 million metric tons of carbon

⁴ Mountain Valley Pipeline, LLC, “Mountain Valley to offset operational emissions,” Updated August 19, 2021. Available at: <https://www.mountainvalleypipeline.info/mvp-to-offset-operational-emissions/>.

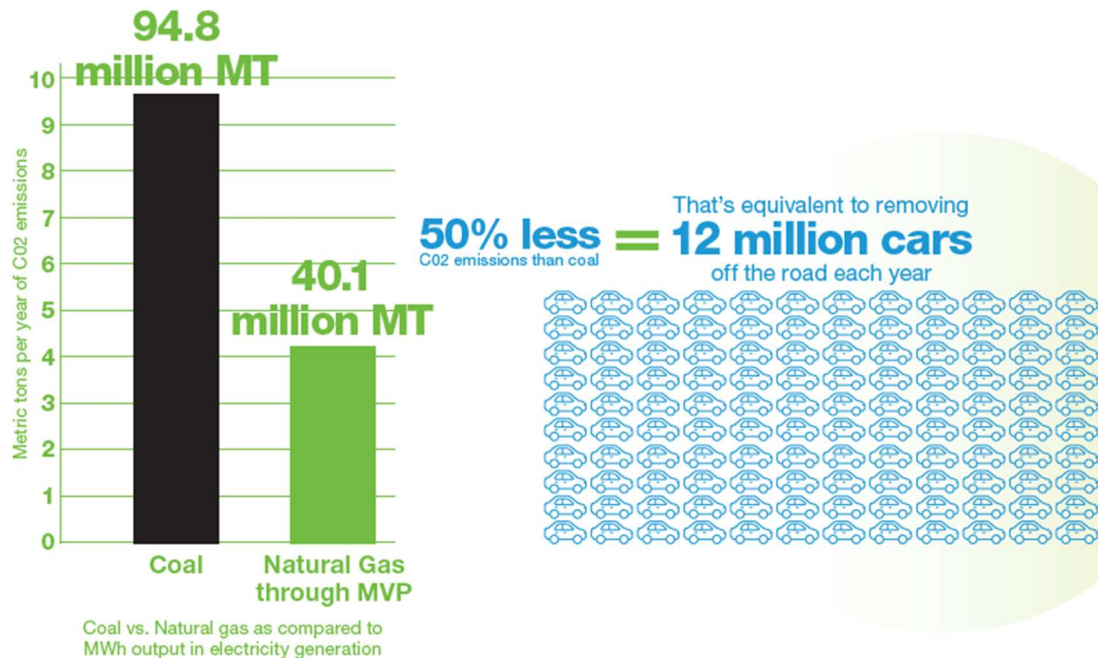
⁵ See <https://www.epa.gov/climateleadership/scope-1-and-scope-2-inventory-guidance#>.

⁶ <https://www.epa.gov/climateleadership/scope-3-inventory-guidance>.

⁷ For the purpose of this response, Mountain Valley is not addressing whether these Scope 3 emissions are properly attributable to a midstream transmission pipeline.

⁸ U.S. Energy Information Administration, “Carbon Dioxide Emissions Coefficients by Fuel.” Updated September 16, 2021. Available at: https://www.eia.gov/environment/emissions/co2_vol_mass.php.

dioxide each year. According to the EPA, that is the equivalent of **removing roughly 12 million cars from the road annually.**⁹



The consequences of constraining our nation's energy progress

There are significant consequences of the policy agenda espoused by project opponents. The issues surround energy reliability, stability, and supply, all of which are at the forefront of regional, national, and global events. The objection to new energy infrastructure projects, namely natural gas pipelines, without offering any viable solution to the immediate problems we face today is short-sighted. If we cannot safely and reliably deliver natural gas via critical infrastructure, the consequences are severe: Americans will pay more for the constrained supply; lose access to electricity, heat, and water when outages occur due to weather and security issues; constrain our economic growth; and erode our ability to leverage our energy abundance to address the unfortunate global events unfolding around us. Mountain Valley firmly believes that our national energy policy should include the advancement of renewable energy, but we must recognize, as most objective sources do, that renewables alone will not solve the immediate energy problems we face right now and for the next several decades.

As Senator Manchin has accurately described, the continued roadblocks for Mountain Valley have stalled a key domestic solution to counter Russian energy exports. MVP would deliver 2 billion cubic feet (Bcf) per day of natural gas to the center of the mid-Atlantic market, at a time when domestic energy production remains a key national security issue. The project, which was approved by FERC in 2017, commenced construction in 2018 and total project work is more than 90% complete, with only 4-6 months of work remaining before the facilities can be placed in-

⁹ Specifically, using the EPA's carbon dioxide emission factors for the gas transported and combusted by the MVP, the total emissions are around 40 million MT of carbon dioxide. On the other hand, in order to produce the same amount of MWh with coal using the newest, most efficient plant on the market, the total carbon dioxide emissions per year is almost 95 million MT.

service. Finishing MVP's construction and placing it in operation will provide access to lower-cost, Appalachian-produced natural gas for consumers in the Southeast region, an area that is currently most affected by rising energy prices and vulnerable to energy reliability and supply concerns.

The completion of the MVP has been delayed due to an onslaught of litigation by project opponents who have challenged permits duly issued by federal and state agencies, appearing more interested in policy agendas than environmental protection. Unfortunately, some judicial decisions have encouraged the opposition's litigation efforts, as the courts have seemingly strayed from the traditional standards of deference that have been historically given to those state and federal agencies that Congress has entrusted with safeguarding the environment, superintending national forests, and implementing our national energy policy.

We welcome a continued dialogue on the potential benefits of the MVP and, through this letter and previous public filings, have attempted to correct the record. MVP's total route is roughly 304 miles, with more than 280 miles of pipeline already in the ground. State and federal agencies have formally recognized that it would be better for the environment to complete the remaining construction and finalize restoration efforts. There should be no dispute that the opposition's obstructive litigation tactics are having a negative impact on the environment as they are delaying final restoration efforts. We should also remember that Mountain Valley has previously received all required state and federal permits by relevant agencies. These permits outlined a comprehensive set of terms and conditions that met or exceeded any previous standards for such projects, reinforcing that all activities have been and will be completed under the watchful eye of multiple state and federal oversight programs. Mountain Valley has a few months left of work to complete this important energy infrastructure project, which will not only support the strategy behind our national energy policy but will secure progress in the way of future environmental protection efforts by contributing to a significant reduction of GHG emissions happening today.

Mountain Valley will provide a sustainable infrastructure solution for delivering safe, reliable, and affordable natural gas to the mid-Atlantic and Southeast regions of the U.S. and will play a vital role in our nation's transition to a lower-carbon future. If you have any questions, please do not hesitate to contact me at tnormane@equitransmidstream.com.

Respectfully submitted,
Mountain Valley Pipeline, LLC
by and through its operator,
EQM Gathering Opco, LLC

By:



Todd Normane
Deputy General Counsel