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July 17, 2017

Ms. 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 23, 2015, Mountain Valley Pipeline, LLC (“Mountain Valley” or “MVP”) filed a certificate application with the Federal Energy Regulatory Commission (“Commission” or “FERC”) for the Mountain Valley Pipeline Project (“Project”) in the above-identified docket. On June 23, 2017, the Commission issued the Final Environmental Impact Statement for the Project. In this filing, Mountain Valley submits 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

A handwritten signature in blue ink, appearing to read "Matthew Eggerding".

Matthew Eggerding
Counsel, Midstream

Attachments

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



United States Department of the Interior

NATIONAL PARK SERVICE
Northeast Region
United States Custom House
200 Chestnut Street
Philadelphia, PA 19106

IN REPLY REFER TO:
A.1.2 (NER-RSS)

MAY 09 2017

Thomas C. Jensen
Holland & Hart LLP
975 F Street, NW, Suite 900
Washington, DC 20004

**Subject: Follow-Up to Conversation on the Mountain Valley Pipeline Project
(Mountain Valley Pipeline, LLC); West Virginia and Virginia**

Dear Tom:

I appreciated the opportunity to discuss the Mountain Valley Pipeline (MVP) Project with you, and look forward to any future conversations. You had a number of questions for me. You'll find the answers below.

First, your questions about the Appalachian National Scenic Trail (ANST).

- **Does the National Park Service (NPS) assert jurisdiction over the Forest Service (FS) decision on the MVP crossing of the ANST within the Jefferson National Forest (NF)?** No, we do not. We believe you may be referring to an earlier proposal by MVP for a different crossing location and alternatives. NPS met with MVP and once we explained that "transfer lands", like NPS-owned lands on the ANST, required Congressional approval, MVP staff changed their proposal. The Draft Environmental Impact Statement (DEIS) does include an alternative that would cross transfer lands and thus, would have to go to Congress, but nothing we have received from MVP indicates this is the proposed action.
- **Who does NPS believe has the authority to authorize the crossing of the ANST where the ANST is inside the National Forest?** "Inside the national forest" is not the dividing line for NPS having the authority or not. The Forest Service is the permitting authority in the currently proposed location. This might not be the case in other locations on Forest Service land if those lands were "transfer lands" from NPS. The 1993 Memorandum of Agreement (MOA) between NPS and the Forest Service notes that the

NPS will retain responsibility for any future authorization of oil or gas pipeline crossings in such cases.

- **Assuming NPS does believe it has the authority to authorize the crossing, what exactly is NPS' compliance process for the ANST (Environmental Assessment (EA), Categorical Exclusion (CE), or something else) and timeline?** See above. The Forest Service is the permitting authority for the proposed MVP crossing of the ANST in this location. Our attempts to correct the Federal Energy Regulatory Commission (FERC) record in our DEIS comments in December, 2016 may have been misinterpreted. The explanation of NPS general authority over the ANST that appeared in the DEIS was incorrect. Our comments were meant to correct the general statements on our authority, and not to assert authority over the MVP proposed crossing location.

Blue Ridge Parkway (BLRI) Questions and Answers:

- **What exactly is NPS' compliance process for the BLRI and timeline? Will the timeline indeed match FERC's timeline? Will there be hearings? Is there opportunity for MVP input? Does NPS need any additional information from MVP to make its decision?** The BLRI will be completing compliance paperwork for a CE. Superintendent, Mark Woods, is currently reviewing the report on the internal analysis that has taken place. Once he gives the go ahead (expected very soon), BLRI staff will move forward concurrently on multiple fronts: 1) compliance staff will prepare paperwork to complete the CE; 2) BLRI staff will work with the VA State Historic Preservation Officer (SHPO) and the Southeast Archaeology Center (SEAC) to complete consultation under Section 106 of the National Historic Preservation Act (NHPA); and 3) BLRI permitting staff will begin to prepare and draft right-of-way and construction permits. Steps under number 2 above are already underway and NPS will be contacting MVP staff shortly in order to move ahead.

NPS staff are currently putting together a list and timeline for all the various small steps necessary to get to signed, final construction and right-of-way permits. That information will be shared with MVP staff for the meeting in Roanoke, VA on May 1², 2017. Staff are also reviewing the materials MVP has already submitted and checking it against the list of materials required for the permits. MVP will be contacted as soon as any outstanding information needs are identified. Final permits will not be signed until after the FEIS is released. NPS will review the FEIS to make sure there are not any inconsistencies with the draft permits before signing the two permits. (For more information on permits, see below.)

NPS understands that June 23, 2017, is the new FEIS target release date. This is the target date on MVP's own web site. Once the FEIS is released, federal agencies have a 90-day period to complete federal permitting. NPS anticipates finishing well within that timeframe.

There is not a need for hearings for completion of the CE. NPS will contact MVP if other information is needed from the company for this step. In the meantime, as detailed above, NPS will contact MVP to go over the steps to completion of the permitting process.

Overall Questions:

- **Can NPS clarify who is the deciding official for issuance of a long-term Right of Way for a natural gas pipeline to cross a NPS unit?** For the Blue Ridge Parkway, the Regional Director, in this case, Stan Austin, Regional Director, Southeast Region, will sign the right-of-way permit. Superintendent Mark Woods, of the Blue Ridge Parkway, will sign the construction permit, which is also required. NPS notes that very few units in the National Park System have the authority to consider authorization for petroleum product pipelines. The BLRI is one of the few; the ANST is not. In most cases, Congress must act, under 36 USC 185, to allow NPS to consider such pipelines. In a generic case, once Congress were to give authority for NPS to consider authorizing a pipeline, it is the Regional Director who has the authority to sign the right-of-way permit, and generally the Superintendent who signs the construction permit.

If you have any further questions or need additional information, please don't hesitate to contact me at bob_krumenaker@nps.gov or 215-597-7985. One note to pass along: my staff has found the process of working with MVP and EQT productive and enjoyable. In particular they'd like to acknowledge the professionalism and helpfulness of John Centofanti and Megan Neylon throughout this process. They've put in an extraordinary amount of work and we don't want to let their efforts go unacknowledged.

Sincerely,



Robert J. Krumenaker
Acting Associate Regional Director
Resource Stewardship and Science
Northeast Region