



**The Culture Center**  
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EEO/AA Employer

October 24, 2018

Mr. Paul Friedman  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

RE: Mountain Valley Pipeline Project  
FERC Docket No. CP 16-10  
Proposed Variances:  
Slip Mitigation Workspace MVP-ATWS-SM-026 Extension  
Temporary Aboveground Waterline MVP-WL-001  
Associated Temporary Workspace MVP-ATWS-1600  
FR: 15-67-MULTI-127

Dear Mr. Friedman:

We have reviewed the information that was submitted for the abovementioned undertaking. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, U.S. 36 CFR § 800: "Protection of Historic Properties," we submit our comments.

According to the submitted information, Mountain Valley Pipeline (MVP) proposes three new variances in Wetzel County, WV. Variance MVP-ATWS-SM-026 Extension is needed to stabilize the hillside area to repair a slip that occurred along the pipeline between mileposts 3.6 and 3.7 of the pipeline centerline, near the town of Smithfield in Wetzel County, WV. Variances MVP-WL-001 and MVP-ATWS-1600 are needed to conduct hydrostatic testing. The proposed waterline will extend to the southwest for approximately 880 meters along Mobley Run from the pipeline interconnect at milepost 0.0 towards Mobley, WV. The proposed workspace MVP-ATWS-1600 is located at the southern terminus of the waterline. Most of the waterline was previously surveyed in June 2018 with negative results. The direct and indirect areas of potential effect (APE) are consistent with that for the previously surveyed pipeline corridor.

Archaeological Resources:

As indicated in the submitted materials, no previously identified archaeological sites are located within or within the vicinity of the proposed variances. In addition, personnel from Tetra Tech conducted a pedestrian reconnaissance within the variances and observed sloped terrain and prior disturbance. No cultural resources were identified. We concur that no further archaeological investigation is necessary and that use of the area will have no effect on archaeological historic properties.

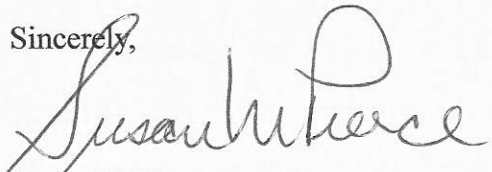
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Architectural Resources:

We have reviewed the submitted information and concur no further consultation is necessary regarding the proposed project elements. MVP-ATWS-SM-026 is located within the previously established visual APE and field surveys determined no structures or buildings are located within the direct APE for that project element. Use of the variances identified as MVP-WL-001 and MVP-ATWS-1600 will require no tree clearance, and no above-ground properties have been identified within those defined direct APEs. While MVP-ATWS-1600 is located outside the previously defined visual APE, field surveys determined no extant structures 50 years of age are located near or will have a view of that variance. No further consultation is necessary regarding architectural resources; however, we ask that you contact our office if the project should change.

We appreciate the opportunity to be of service. *If you have questions regarding our comments or the Section 106 process, please contact Lora A. Lamarre-DeMott, Senior Archaeologist, or Mitchell K. Schaefer, Structural Historian, at (304) 558-0240.*

Sincerely,



Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/LLD/MKS

CC: Ms. Evelyn Tidlow, GAI Consultants