

**Mountain Valley Pipeline, LLC  
Mountain Valley Pipeline Project  
Docket No. CP16-10-000**

**October 2016 Comments on Draft Environmental Impact Statement<sup>1</sup>**

<b>Page No.</b>	<b>Paragraph/ Table/ Figure No.</b>	<b>Text in DEIS</b>	<b>Comment</b>	<b>Suggested Resolution</b>
ES-1	3rd paragraph	“Mountain Valley’s proposal (the Mountain Valley Project [MVP]) would involve construction and operation of about 301 miles of new 42-inch-diameter natural gas pipeline and associated facilities in West Virginia and Virginia. Mountain Valley also proposes to construct and operate 3 new compressor stations, 4 new meter stations and interconnects, 2 taps, 36 mainline valves, 5 pig launchers/receivers, and 31 cathodic protection beds.”	Facilities updated to reflect October 2016 Proposed Route.	“Mountain Valley’s proposal (the Mountain Valley Project [MVP]) would involve construction and operation of about 303.4 miles of new 42-inch-diameter natural gas pipeline and associated facilities in West Virginia and Virginia. Mountain Valley also proposes to construct and operate 3 new compressor stations, 4 new meter stations and interconnects, 3 taps, 36 mainline valves, pig launchers/receivers at five locations, and 31 cathodic protection beds.”
ES-10	6th Paragraph	“Three previously recorded Historic Districts (Blue Ridge Parkway Historic District, North Fork Valley Rural Historic District, and Greater Newport Rural Historic District) that would be crossed by the MVP pipeline route are listed on the NRHP.”	MVP will cross four separate previously recorded districts, though the Newport Rural Historic District is encompassed within the Greater Newport Rural Historic District.	“Four previously recorded Historic Districts (Blue Ridge Parkway Historic District, North Fork Valley Rural Historic District, Newport Rural Historic District, and Greater Newport Rural Historic District) that would be crossed by the MVP pipeline route are listed on the NRHP.”
1-15	4th paragraph	“Mountain Valley filed its permit applications with the Huntington and Norfolk Districts of the COE on February 21, 2016.”	MVP also filed an application with the Pittsburgh USACE Office.	“Mountain Valley filed its permit applications with the Pittsburgh, Huntington and Norfolk Districts of the COE on February 21, 2016.”
1-37	Table 1.5-1	“Conversion/Diversion of Open Space Access or Utility Easement Application under Virginia Code Section 10.1-1704”	No longer will need Conversion/Diversion application with adoption of Mount Tabor Variation into October 2016 Proposed Route and alternative access road near I-81.	Delete text.

<sup>1</sup> On October 20, 2016, Mountain Valley filed all tables, figures, and appendices in the Draft Environmental Impact Statement that have been updated for the October 2016 Proposed Route. The comments included in this table are in addition to the updates filed on October 20, 2016. Mountain Valley may supplement these comments as appropriate.

Page No.	Paragraph/ Table/ Figure No.	Text in DEIS	Comment	Suggested Resolution
2-11	7th paragraph	"The MVP would include the construction of 3 new compressor stations; 4 M&R stations and interconnects; 2 taps; 5 pig launchers and receivers; and 36 MLVs (as listed on table 2.1-5)."	For its October 2016 Proposed Route, MVP will install launchers and receivers at five locations and also install three taps.	"The MVP would include the construction of 3 new compressor stations; 4 M&R stations and interconnects; 3 taps; pig launchers and receivers at 5 locations; and 36 MLVs (as listed on table 2.1-5)."
2-13	1st paragraph	"Besides the communication tower, other equipment at the station would include gas filter/separators, gas coolers, inlet air filters, exhaust silencers, tanks, blowdown silencers, heaters, auxiliary micro-turbines, and a pig receiver."	Communication towers are no longer proposed at the compressor station sites.	"Other equipment at the station would include gas filter/separators, gas coolers, inlet air filters, exhaust silencers, tanks, blowdown silencers, heaters, auxiliary micro-turbines, and a pig receiver."
2-15	1st paragraph	"A single communication tower would be contained completely within each of the three new compressor stations. Each communication tower would be 60 feet tall and would include one to three radio antennas. The tower would include three vertical posts supported by cross beams for the entire length and attached to a concrete foundation."	Communication towers are no longer proposed at the compressor station sites.	Delete text.
2-15	1st paragraph	"Mountain Valley would install very small aperture terminal (VSAT) equipment at all three compressor stations, all four interconnections, and all 36 MLV sites for primary telecommunications service."	VSAT may not be the primary communications link at each MLV site.	"Mountain Valley would install very small aperture terminal (VSAT) equipment at all three compressor stations and all four interconnections. A combination of two of the following methods will be installed at each MLV sites; VSAT, Cellular, Telephone System, and/or T1.
2-15	2nd paragraph	"The communication towers would not emit any light or noise."	Communication towers are no longer proposed at the compressor station sites.	Delete text.
2-15	3rd paragraph	"One MLV would be within the Bradshaw Compressor Station; one would be installed at the Mobley Interconnect; and one would be installed at the Transco Interconnect."	There are also MLVs within the Harris and Stallworth Compressor Stations.	"One MLV would be within each of the three compressor stations; one would be installed at the Mobley Interconnect; and one would be installed at the Transco Interconnect."
2-26	5th Paragraph	"The proposed aboveground facilities for the MVP include 3 new compressor stations, 4 new M&R stations and interconnects, 2 taps, 36 MLVs, and 5 pig launcher and receivers."	Facilities updated to reflect October 2016 Proposed Route.	"The proposed aboveground facilities for the MVP include 3 new compressor stations, 4 new M&R stations and interconnects, 3 taps, 36 MLVs, and 8 pig launcher and receivers at 5 locations.;"

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2-26	Paragraphs 2-9	<p>“Construction of the Bradshaw Compressor Station would affect about 24 acres. Operation of the Bradshaw Compressor Station would use just under 6 acres. Construction of the Sherwood Interconnect and receipt M&amp;R station would affect about 7 acres. The operational footprint for the Sherwood Interconnect would be about 2 acres. Construction of the WB Interconnect and delivery M&amp;R station would affect about 6 acres. The operational footprint for the WB Interconnect would cover just over 1 acre. Construction of the Transco Interconnect and delivery M&amp;R station would affect about 6 acres. Construction of the new M&amp;R stations, interconnections, and taps would affect a total of about 24 acres (18 acres in West Virginia and 6 acres in Virginia). Operation of the M&amp;R stations would utilize a total of less than 7 acres. Construction of the Mobley Interconnect and receipt M&amp;R station would require about 5 acres. This facility would have an operational footprint of less than 1 acre. The operational footprint for the Transco Interconnect and M&amp;R station would cover more than 2 acres. Construction of the Harris Compressor Station would require about 21 acres. Operation of the station would utilize a little more than 4 acres. Construction of the Stallworth Compressor Station would affect about 25 acres. Operation of the station would utilize about 6 acres.”</p>	<p>Update numbers to be consistent with the updated Table 2.3-1 filed October 20, 2016.</p>	<p>“Construction of the Bradshaw Compressor Station would affect about 36.5 acres. Operation of the Bradshaw Compressor Station would use just over 6 acres. Construction of the Sherwood Interconnect and receipt M&amp;R station would affect about 12 acres. The operational footprint for the Sherwood Interconnect would be less than 2 acres. Construction of the WB Interconnect and delivery M&amp;R station would affect about 10 acres. The operational footprint for the WB Interconnect would cover just over 1 acre. Construction of the Transco Interconnect and delivery M&amp;R station would affect about 41 acres. Construction of the new M&amp;R stations, interconnections, and taps would affect a total of about 66 acres (25 acres in West Virginia and 41 acres in Virginia). Operation of the M&amp;R stations would utilize a total of less than 7 acres. Construction of the Mobley Interconnect and receipt M&amp;R station would require about 3 acres. This facility would have an operational footprint of approximately 1 acre. The operational footprint for the Transco Interconnect and M&amp;R station would cover more than 2 acres. Construction of the Harris Compressor Station would require about 16 acres. Operation of the station would utilize a little more than 5 acres. Construction of the Stallworth Compressor Station would affect about 30 acres. Operation of the station would utilize about 7 acres.”</p>
3-75	TABLE 3.5.3-1	<p>“Given consideration of these factors, the FERC staff cannot conclude that the New River Conservancy Variation is preferable to the proposed route at this time.”</p>	<p>On page 4-254, the DEIS states as follows: “In section 3.5.3 of this EIS we considered the alternative, but concluded that the variation would not be environmentally superior to the proposed route.”</p>	<p>“Given consideration of these factors, the FERC staff concludes that the variation would not be environmentally superior to the proposed route.”</p>

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4-207	1st paragraph	"Communications towers would also be located at the compressor station sites."	Communication towers are no longer proposed at the compressor station sites.	Delete text.
4-228	5th paragraph	"The new compressor stations would include communication towers about 60 feet tall."	Communication towers are no longer proposed at the compressor station sites.	Delete text.
4-99	1st paragraph	"The MVP would cross three waterbodies that are considered navigable waters under Section 10 of the RHA: the Elk River at MP 87.4, the Gauley River at MP 118.6, and the Greenbrier River at MP 170.6."	MVP crosses additional waterbodies that have been studied for Section 10 status but official determinations have not yet been made. Mileposts have been updated for the October 2016 Proposed Route.	"The MVP would cross three waterbodies that are considered navigable waters under Section 10 of the RHA in West Virginia: the Elk River at MP 87.3, the Gauley River at MP 118.9, and the Greenbrier River at MP 171.6. In addition, in Virginia, MVP would cross three additional waterbodies that have been studied for Section 10 status but official determinations have not yet been made: The Roanoke River at MP 235.6, the Blackwater River at MP 269.8, and the Pigg River at MP 289.2."
4-137	2nd paragraph	"The MVP pipeline route would cross two parcels managed by the VOF in Montgomery County, Virginia. Parcel MON-VOF-3333 at MP 223.0 is an open grass pasture area bordered by open pastures and mixed deciduous-coniferous forest previously fragmented by an electrical utility line. This easement is managed by the VOF as an open space vegetation community with scenic and recreational properties. Parcel MON-VOF-1871 (MP 232.6) is an area of contiguous deciduous forest adjacent to Interstate-81."	MVP's October 2016 Proposed Route avoids crossing parcels MON-VOF-3333 and MON-VOF-1871.	"MVP would utilize an existing roadway within a forested area on ROA-VOF-2563."

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4-156	2nd Paragraph	"Additionally, aerial surveys are planned for winters of 2016-2017 and 2017-2018, and further ground surveys are planned for portions of the project area that would intersect major waterbodies (primary nesting and roosting habitat for bald eagles) during winter of 2017-2018."	Aerial surveys completed during spring 2016 in Virginia and subsequent negative results for nest sightings are not referenced in the DEIS. USFWS Elkins Field Office requested ground surveys for eagles and nests be targeted at three major waterbody crossings in WV, whereas USFWS Gloucester field Office never specified survey locations.	"Aerial surveys for bald eagle nests were conducted during spring 2016 in Virginia, and no nests or birds were observed during the survey. Additional aerial surveys are planned for winters of 2016-2017 and 2017-2018 in Virginia, and further ground surveys are planned for portions of the project area that would intersect major waterbodies (primary nesting and roosting habitat for bald eagles) in West Virginia during winter of 2017-2018."
4-158	1st bullet point; 1st paragraph	"The MVP pipeline route would cross the Mill Creek Springs Natural Area Preserve at about MP 223.2 in Montgomery County."	By incorporating the Mount Tabor Variation, MVP's October 2016 Proposed Route does not impact the Mill Creek Springs Natural Area Preserve.	Delete text.
4-158	3rd paragraph	"However there are no records of federal or state-listed species associated with the site."	VDCR documented two tri-colored bats. This bat species is now VA state-listed. Furthermore, there is a historic record of a northern long-eared bat within Canoe Cave, prompting USFWS and VDGIIF to consider Canoe Cave as a known, northern long-eared bat hibernaculum.	"Canoe Cave also has a high potential for use as a bat hibernacula. VDCR staff inventoried Canoe Cave in November 2015 and observed two tri-colored bats, now considered as state-endangered. Furthermore, the federally-threatened northern long-eared bat is historically known to occupy the cave in winter, prompting the USFWS to consider Canoe Cave as a known, occupied hibernaculum for the species."

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4-158	4th paragraph	"There is the potential for the Slussers Chapel Cave to contain the Ellett Valley millipede ( <i>Pseudotremia cavernarum</i> ), which is listed as endangered in Virginia."	The Ellett Valley millipede ( <i>Pseudotremia cavernarum</i> ) is not state endangered but rather state threatened according to VDGIF.	"There is the potential for the Slussers Chapel Cave to contain the Ellett Valley millipede ( <i>Pseudotremia cavernarum</i> ), which is listed as threatened in Virginia."
4-163	1st paragraph	"The Applicants would also allow the rights-of-ways adjacent to a 10-foot-wide strip over the pipeline to grow as scrub-shrub habitat so as to provide a more gradual transition between the pipeline corridor and the surrounding forested habitat."	The referenced DEIS text applies to wetlands, not upland areas. In upland areas, a 50-foot-wide permanent right-of-way will be maintained.	"In wetlands, the Applicants would also allow the rights-of-ways adjacent to a 10-foot-wide strip over the pipeline to grow as scrub-shrub habitat so as to provide a more gradual transition between the pipeline corridor and the surrounding forested habitat."
4-165	5th paragraph	"Operation would include the presence of new 60-foot-tall communication towers at each of the compressor stations (see sections 2.1.2.1 and 2.3.2.2)."	Communication towers are no longer proposed at the compressor station sites.	Delete text.
4-166	2nd paragraph	"Tree clearing on the MVP during this timeframe would be confined to between MPs 23.2 and 25.9, MPs 71.3 and 73.4, MPs 108.3 and 115.6, and MPs 297.0 and 301.0."	Tree clearing during this timeframe may apply to areas in addition to those identified in the DEIS.	"Tree clearing on the MVP during this timeframe would be monitored by avian survey teams, which will conduct nest searches in these forested areas prior to tree-clearing."
4-195	3rd paragraph	"The VDGIF further noted that additional surveys were schedule for the spring of 2016; however, Mountain Valley has not yet provided survey reports or notified us whether surveys were completed."	VDGIF did not request that MVP conduct surveys.	"The VDGIF further noted that additional surveys were scheduled for the spring of 2016. Following those 2016 surveys, VDGIF informed MVP that no falcons were detected at the site of interest near the New River."
4-207	1st paragraph	"Communications towers would also be located at the compressor station sites."	Communication towers are no longer proposed at the compressor station sites.	Delete text.
4-219	Table 4.8 1-8	"MON-VOF-2564"	Incorrect ID number and impacts.	"ROA-VOF-2563" -- Should also show "0.4 ac" for construction with crossing method depicted as access road

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4-223	3rd paragraph	"VOF open space parcels MON-VOF-3333 and MON-VOF-1871 are in Montgomery County and would be crossed by the MVP pipeline route at MPs 223.0 and 232.6, respectively. In addition, a proposed access road would cross parcel MON-VOF-1871, and another temporary access road would cross parcel ROA-VOF-2564 in Roanoke County near MP 237.3."	MVP's October 2016 Proposed Route avoids crossing parcels MON-VOF-3333 and MON-VOF-1871.	"MVP would utilize an existing roadway on ROA-VOF-2563 in Roanoke County."
4-228	5th paragraph	"The new compressor stations would include communication towers about 60 feet tall."	Communication towers are no longer proposed at the compressor station sites.	Delete text.
4-253	3rd paragraph	"The proposed route of the MVP pipeline would cross three easements held by the VOF. Property MON-VOF-3333 would be crossed for approximately 1,910 feet and MON-VOF-1871 would be crossed for approximately 315 feet. The two pipeline crossings would be open trenched. When crossing VOF lands, Mountain Valley would route the pipeline parallel to existing rights-of-way, such as roads and powerlines, to the extent possible."	MVP's October 2016 Proposed Route avoids crossing parcels MON-VOF-3333 and MON-VOF-1871.	Delete text.
4-254	3rd paragraph	"However, in a filing dated July 18, 2016, Mountain Valley identified the 'New River Conservancy Variation,' which would avoid the easement by moving the pipeline route to the south. In section 3.5.3 of this EIS we considered the alternative, but concluded that the variation would not be environmentally superior to the proposed route. In a letter to the FERC dated August 19, 2016, an attorney representing Sizemore Inc., the owners of the tract, indicated that they object to the New River Conservancy Variation and prefer the original proposed route for the pipeline."	MVP has changed the name of the "New River Conservancy Variation" to "Variation 82" for the October 2016 Proposed Route.	"However, in a filing dated July 18, 2016, Mountain Valley identified 'Variation 82' (formerly the 'New River Conservancy Variation'), which would avoid the easement by moving the pipeline route to the south. In section 3.5.3 of this EIS we considered the alternative, but concluded that the variation would not be environmentally superior to the proposed route. In a letter to the FERC dated August 19, 2016, an attorney representing Sizemore Inc., the owners of the tract, indicated that they object to Variation 82 and prefer the original proposed route for the pipeline."

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4-254	4th paragraph	"The proposed route of the MVP pipeline would cross one NRC-managed property for approximately 7,025 feet. Mountain Valley filed with the FERC on April 21, 2016 plans for crossing TNC parcels. Mountain Valley stated that it originally proposed to locate the pipeline adjacent to an existing powerline, but after communications with TNC the route was shifted south to lessen impacts on environmental resources."	NRC and TNC manage two different sets of conservation easements	"The proposed route of the MVP pipeline would cross one TNC-managed property for approximately 7,025 feet. Mountain Valley filed with the FERC on April 21, 2016 plans for crossing TNC parcels. Mountain Valley stated that it originally proposed to locate the pipeline adjacent to an existing powerline, but after communications with TNC the route was shifted south to lessen impacts on environmental resources."
4-386	2nd paragraph	The MVP would include construction and operation of 301 miles of natural gas transmission pipeline, three new natural gas-fired compressor stations (Bradford, Harris, and Stallworth Compressor Stations), and other associated aboveground ancillary facilities (pig launchers/receivers, interconnects, and valves and meter stations) within 17 counties in West Virginia and Virginia.	The Bradshaw Compressor Station is incorrectly called the Bradford Compressor Station.	The MVP would include construction and operation of 301 miles of natural gas transmission pipeline, three new natural gas-fired compressor stations (Bradshaw, Harris, and Stallworth Compressor Stations), and other associated aboveground ancillary facilities (pig launchers/receivers, interconnects, and valves and meter stations) within 17 counties in West Virginia and Virginia.
4-405	Table 4.11.1-5	"Roanoke Compressor Station"	The Roanoke tap is incorrectly categorized as a compressor station.	"Roanoke Tap"
4-516	Table 4.12.2-1	"TABLE 4.13.2-1"	Table incorrectly numbered. Paragraph above the table references Table 4.13.2-2.	"TABLE 4.13.2-2". Also, the units, based on the attached calculations should be in metric tons, not short tons (TPY).
ES-12	6th Paragraph	"Installation of the pipeline within the Jefferson National Forest would not prevent FS personnel from fighting fires, including the use of heavy equipment near or over the pipeline."	FS and MVP will coordinate as to the use of heavy equipment.	"Installation of the pipeline within the Jefferson National Forest would not prevent FS personnel from fighting fires near or over the pipeline. However, Mountain Valley would require that operation of heavy equipment within the right-of-way be coordinated with Mountain Valley to ensure the integrity of the pipeline is maintained."
4-136	3rd paragraph	"In Virginia, sensitive vegetation communities that could be affected by the MVP include a VDCR Conservation Area, open space parcels managed by the VOF, an easement managed by the NRC and the TNC, and the Jefferson National Forest.	Update to reflect MVP's October 2016 Proposed Route.	"In Virginia, sensitive vegetation communities that could be affected by the MVP include VDCR Conservation Areas, an easement managed by the VOF, an easement managed by the NRC, another easement managed by the TNC, and the Jefferson National Forest.

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4-467	2nd paragraph	"Mountain Valley also indicated that with plans to install Class 2 pipe buried at least 36 inches below the ground surface within the Jefferson National Forest, there would be no restrictions on the use of heavy firefighting equipment by the FS. Heavy vehicles such as large bulldozers and fireplows would be allowed to fight fires on FS lands over or near the pipeline."	FS and MVP will coordinate as to the use of heavy equipment.	"Mountain Valley also indicated that with plans to install Class 2 pipe buried at least 36 inches below the ground surface within the Jefferson National Forest. However, Mountain Valley would require that operation of heavy equipment within the right-of-way be coordinated with Mountain Valley to ensure the integrity of the pipeline is maintained."
4-516	2nd Paragraph	"The MVP would cross a 3.4-mile portion of the Jefferson National Forest in Giles, Craig and Montgomery Counties, Virginia."	Incorrect counties have been identified	"The MVP would cross a 3.4-mile portion of the Jefferson National Forest in Monroe County, West Virginia and Giles and Montgomery Counties, Virginia."