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EEO/AA Employer

October 17, 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  
Variances: Access Road MVP-ANC-009  
Access Road MVP-FS-001  
Workspace BSS Fill Site  
FR: 15-67-MULTI-123

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 (3) variances—two access roads and a workspace area—for use in constructing the aforementioned pipeline. No tree-clearing or new construction of aboveground pipeline facilities are proposed in association with these three variances. The direct and indirect areas of potential effect (APE) are consistent with that for the previously surveyed pipeline corridor.

Archaeological Resources:

Archaeological survey of the proposed variance APEs included visual inspection and shovel probe excavation. Prior disturbance was observed. No cultural resources were identified. Consequently, we concur that no further archaeological investigation is necessary and that use of these areas will have no effect on archaeological historic properties.

Architectural Resources:

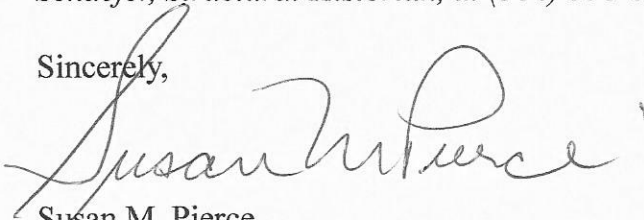
We have reviewed the submitted information and concur no further consultation is necessary regarding the aforementioned project elements. Use of the three (3) variance areas will require no tree clearance, and no above-ground properties have been identified within the defined direct areas of potential effect (APEs). One (1) architectural property that is older than 45 years of age is located within view of the northern portion of MVP-FS-001. As the variances will require no tree removal or new above-ground construction, it is our opinion use of the proposed workspace and access roads

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should impose *no effect* on that property, even if it were deemed to possess historic significance. 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,

A handwritten signature in cursive script that reads "Susan M. Pierce". The signature is written in dark ink and is positioned above the typed name and title.

Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/LLD/MKS

CC: Ms. Evelyn Tidlow, GAI Consultants