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December 22, 2016

Joby Timm  
Forest Supervisor  
Jefferson National Forest  
5162 Valleypointe Parkway  
Roanoke, VA 24019

Bruce Dawson  
Southeastern States District Manager  
Bureau of Land Management  
273 Market Street  
Flowood, MS 39232

Re: Mountain Valley Pipeline, LLC  
FERC Docket No. CP16-10-000  
Clarification of Agency Comments

Dear Mr. Timm and Mr. Dawson:

In a letter dated December 12, 2016, the United States Forest Service (“Forest Service”) provided comments on the Mountain Valley Pipeline Project (“Project”) in the above-identified docket (“Forest Service Letter”). In addition, in a letter dated December 1, 2016, the Bureau of Land Management (“BLM”) provided comments in the same docket (“BLM Letter”).

Mountain Valley Pipeline, LLC (“Mountain Valley”) provides herein clarifications and responses to certain issues raised by the Forest Service and BLM:

<u>Comment in Letter</u>	<u>Mountain Valley’s Clarification/Response</u>
“There have been several route variations to the proposed pipeline on NFS lands” and “[d]ue to these significant changes the Forest Service recommends the ‘seen area’ analysis be conducted again with the latest proposed pipeline location.” (Forest Service Letter)	Following months of consultation with the Forest Service, Mountain Valley agreed to incorporate two minor route modifications within the Jefferson National Forest into its October 2016 Proposed Route. Following additional consultation with the Forest Service and contrary to Mountain Valley’s view to limit impacts, Mountain Valley has incorporated an additional minor route modification in the area of Mystery Ridge Road. <sup>1</sup> Mountain Valley has conducted or will conduct updated “seen area” analyses at these locations. Given these adjustments are

<sup>1</sup> See the alignment sheets included in Attachment D to Mountain Valley’s supplemental materials filing dated December 22, 2016.

	<p>very minor as defined in the DEIS, they are not expected to have any impact on the visual analysis already conducted.</p> <p>Mountain Valley and the Forest Service continue to discuss fine tuning the proposed route throughout the Jefferson National Forest. However, Mountain Valley does not expect to incorporate any additional route modifications within the Jefferson National Forest unless specifically required by the Forest Service or FERC.</p>
<p>“[T]he construction right-of-way width may be increased by 25 feet to accommodate topsoil segregation, pending [Mountain Valley’s] response to the Forest Service’s information request date November 15, 2016.” (Forest Service Letter)</p>	<p>Mountain Valley submitted a response to the Forest Service’s data request on December 16, 2016 that addresses this perception.</p> <p>While FERC’s Upland Erosion Control, Revegetation, and Maintenance Plan (“Plan”) allows the construction right-of-way to be expanded by up to 25 feet to accommodate topsoil segregation, the Plan also states the “[p]roject use of these additional limited areas is subject to landowner or land management agency approval and compliance with all applicable survey and permit requirements.” Mountain Valley will perform topsoil segregation in all areas of disturbance on National Forest Service lands within the requested 125-foot construction right- of-way. Mountain Valley is not requesting additional right-of-way width for topsoil segregation. As such, incremental impacts from performing topsoil segregation are not expected. Mountain Valley acknowledges that any request for additional workspace outside of the limits of disturbance approved by FERC and the Forest Service for the purposes of topsoil segregation would be subject to further Forest Service approval.</p> <p>Previously, in Resource Report 1 submitted to FERC on October 23, 2015, Mountain Valley included a drawing that depicted typical construction practices that included topsoil segregation. That typical drawing is included with the data response.</p>

	<p>Further, Mountain Valley prepared drawings in response to the Forest Service’s data request issued October 24, 2016.<sup>2</sup> Those drawings depict topsoil segregation within the 125-foot construction right-of-way.</p>
<p>Mountain Valley “should also field verify existing KOPs during leaf-off” and all “[a]reas not previously surveyed or inventories due to the route variations ... to identify additional KOPs.” (Forest Service Letter)</p>	<p>Mountain Valley has consistently been conducting visual simulations at KOP’s defined by the Forest Service over months of coordination. In addition to the dozens of points already reviewed, Mountain Valley will do “leaf-off” surveys analysis at the KOP locations recently identified as requested by the Forest Service and the Appalachian Trail Conservancy.</p>
<p>“[T]he Forest Service requested a ‘leaf-off’ visual impacts analysis as far back as March 2016 and the National Park Service requested coordination on visual impacts and additional key observation points in June 2015.... [Mountain Valley’s] delay in providing key information ... hinders the BLM’s ability to provide” a schedule. (BLM Letter)</p>	<p>Mountain Valley has not delayed providing any requested information. “Leaf-off” surveys cannot occur until the leaves are off the trees. In the Project area, “leaf-off” occurred very recently. Mountain Valley commenced its “leaf-off” surveys earlier this month and will continue to gather information.</p>
<p>Mountain Valley “has not provided sufficient information regarding the proposed crossings for BLM to provide a detailed discussion of potential avoidance, minimization, and mitigation strategies[.]” (BLM Letter).</p>	<p>Mountain Valley has reviewed and discussed with the Forest Service multiple Project alignments within the Jefferson National Forest to reduce impacts. Further, Mountain Valley has worked extensively, including site visits, with the Forest Service with regard to the proposed crossing of the Appalachian National Scenic Trail. Proposed route adoption of crossing alignment adjustments and extensive set back distances to the Appalachian National Scenic Trail are evidence of cooperative actions.</p>
<p>Mountain Valley “continues to reserve the idea of cutting an open trench over the Appalachian National Scenic Trail if conventional boring is unsuccessful and has provided inadequate information to BLM on this contingency.” (BLM Letter)</p>	<p>Mountain Valley expects to submit a revised Plan of Development to the Forest Service in the first half of January 2017. In the revised Plan of Development, Mountain Valley will remove the open trench contingency. The Forest Service insisted on a backup option to the Appalachian National Scenic Trail crossing that is currently utilizing the very</p>

<sup>2</sup> See Attachment C to Mountain Valley’s supplemental materials filing dated December 22, 2016.

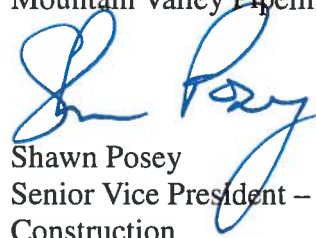
	reliable boring method. Mountain Valley proposed the open cut method as only an extreme backup option to satisfy the Forest Service. An HDD option was extensively reviewed and discussed in person with Forest Service staff as to why it is technically infeasible and poses a much higher risk of failure.
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Mountain Valley has worked, and will continue to work, diligently with the Forest Service, BLM, and other agencies to perform detailed environmental and engineering studies, provide requested information, reduce the Project's footprint and effects, avoid sensitive sites, and minimize and mitigate effects to the maximum extent practicable. Mountain Valley looks forward to continuing its work with the Forest Service, BLM, and other agencies to address their comments.

If you have any questions, please do not hesitate to contact me at (412) 395-3931 or [sposey@eqt.com](mailto:sposey@eqt.com). Thank you.

Respectfully submitted,

Mountain Valley Pipeline, LLC



Shawn Posey  
Senior Vice President – Engineering and  
Construction

cc: Jennifer Adams, Forest Service  
Vicki Craft, BLM  
Paul Friedman, FERC  
FERC Docket  
All Parties