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December 22, 2016

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”) 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 September 16, 2016, the Commission issued the Draft Environmental Impact Statement (“DEIS”) for the Project.

In this filing, Mountain Valley submits additional materials, including the following items:

- Supplemental responses to FERC Staff’s Recommended Mitigation in Draft Environmental Impact Statement. Mountain Valley has filed responses to all items required prior to the end of the public comment period.
- In its supplemental response to Recommendation No. 15, Mountain Valley describes the electrical resistivity (“ER”) surveys it has conducted on the physically-accessible portions of all parcels of the Mount Tabor Variation, which has been incorporated into the October 2016 Proposed Route. The ER analysis indicated a stable sub-surface within the design depth of the pipeline excavation and through a depth where the pipeline could affect, or be affected by, any karst features. Mountain Valley confirms that the referenced portion of the October 2016 Proposed Route is preferable to the originally proposed alignment in the vicinity of the Mount Tabor sinkhole plain.
- A rebuttal of the report submitted by Ernst Kastning in July 2016 (“July 2016 Report”). The July 2016 Report includes numerous errors and omissions that lead to deeply flawed evaluations and conclusions. For example, the July 2016 Report asserts that karst, and especially Appalachian karst, is a “no-build” zone, which is blatantly incorrect considering there are existing natural gas pipelines that traverse karst terrain, including the Appalachian Mountains of Virginia and West Virginia. The July 2016 Report does not (i) present any new information that Mountain Valley has not previously considered, (ii) reflect the reality of construction practices in karst terrain; (iii) consider the volumes

of technical information that Mountain Valley has provided to FERC that characterize karst features and risks, or (iv) consider Mountain Valley's prior actions or future plans to avoid, assess, and mitigate these risks. Mountain Valley's rebuttal report discusses numerous reasons why the July 2016 Report is deeply flawed and should be dismissed.

A full list of the supplemental materials is included below:

<u>Attachment</u>	<u>Description of Materials</u>	<u>Filing Type</u>
A	Supplemental Responses to FERC Staff's Recommended Mitigation in DEIS	Public
B	Mountain Valley's clarification of comments submitted by the U.S. Forest Service and the Bureau of Land Management	Public
C	Site-Specific Design of Stabilization Measures in Selected High-Hazard Portions of the Route of the Proposed Mountain Valley Pipeline Project in the Jefferson National Forest	Public
D	Responses to U.S. Forest Service Comments on the Draft Plan of Development	Public
E	Analysis of the July 2016 Report by Ernst Kastning	Public
F	Response to the November 23, 2016 Letter from Robert Jones	Public
G	Transmittal letter for Cultural Resources Survey, Addendum 1 to Volume II, Braxton and Webster Counties, WV	Public
H	Cultural Resources Survey, Addendum 1 to Volume II, Braxton and Webster Counties, WV	Privileged
I	Transmittal letter for Cultural Resources Survey, Addendum 1 to Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, WV	Public
J	Cultural Resources Survey, Addendum 1 to Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, WV	Privileged
K	Transmittal letter for Phase I Archaeological Investigation, Craig Creek to Brush Mountain Route Survey in Jefferson National Forest, Monroe County, WV and Giles County, VA	Public
L	Phase I Archaeological Investigation, Craig Creek to Brush Mountain Route Survey in Jefferson National Forest, Monroe County, WV and Giles County, VA	Privileged
M	Transmittal letter for Phase I Archaeological Investigation in Blue Ridge Parkway, Roanoke and Franklin Counties, VA (revised November 2016)	Public
N	Phase I Archaeological Investigation in Blue Ridge Parkway, Roanoke and Franklin Counties, VA (revised November 2016)	Privileged
O	Transmittal letter for Cultural Resources Survey, Addendum 1 to Volume IV, Summers and Monroe Counties, WV	Public

P	Cultural Resources Survey, Addendum 1 to Volume IV, Summers and Monroe Counties, WV	Privileged
Q	Transmittal letter for Phase IB Archaeological Survey Report Addendum 2 and Phase II Evaluation Site 44PY0442, Pittsylvania County, VA	Public
R	Phase IB Archaeological Survey Report Addendum 2 and Phase II Evaluation Site 44PY0442, Pittsylvania County, VA	Privileged
S	Transmittal letter for Phase I Archaeological Investigation, Craig Creek to Brush Mountain Re-Route Survey in Jefferson National Forest, Monroe County, WV and Giles County, VA	Public
T	Phase I Archaeological Investigation, Craig Creek to Brush Mountain Re-Route Survey in Jefferson National Forest, Monroe County, WV and Giles County, VA	Privileged
U	Transmittal letter for Phase IB Archaeological Survey Report Addendum 1 and Phase II Archaeological Evaluations, Sites 44CG0253, 44CG0254, and 44CG0255, Craig County, VA	Public
V	Phase IB Archaeological Survey Report Addendum 1 and Phase II Archaeological Evaluations, Sites 44CG0253, 44CG0254, and 44CG0255, Craig County, VA	Privileged
W	December 7, 2016 letter from WVDCH on Cultural Resources Survey, Addendum 1 to Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, WV	Public
X	December 8, 2016 letter from WVDCH on Cultural Resources Survey, Addendum 1 to Volume II, Braxton and Webster Counties, WV	Public
Y	Appendix G to Cultural Resources Survey, Addendum 1 to Volume II, Braxton and Webster Counties, WV (referenced in WVDCH's December 8, 2016 letter and sent to WVDCH on December 21, 2016)	Privileged
Z	Transmittal letter for Phase IB Archaeological Survey Report, Addendum I, Franklin County, VA	Public
AA	Phase IB Archaeological Survey Report, Addendum I, Franklin County, VA	Privileged

Ms. Kimberly D. Bose
December 22, 2016
Page 4 of 4

This filing includes public and privileged information. The attachments that include privileged and confidential information are labeled "Contains Privileged Information – Do Not Release" or similar. Mountain Valley requests that, pursuant to 18 C.F.R. § 388.112, the Commission treat the privileged information as non-public. The person to be contacted regarding the request to treat these materials as non-public is Paul Diehl, (412) 395-5540 or pdiehl@eqt.com.

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



Matthew Eggerding
Counsel, Midstream

Attachments

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