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February 23, 2017

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
Responses to Data Requests issued January 27, 2017

Dear Ms. Bose:

On January 27, 2017, the Office of Energy Projects (“OEP”) of the Federal Energy Regulatory Commission (“Commission”) issued data requests to Mountain Valley Pipeline, LLC (“Mountain Valley”) with respect to Mountain Valley’s certificate application in Docket No. CP16-10-000. On February 9 and 17, 2017, Mountain Valley submitted responses to the data requests. Mountain Valley submits herein additional responses to the data requests. Mountain Valley provided the respondents’ verifications on February 9, 2017.

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

A handwritten signature in blue ink that reads "Matthew Eggerding".

Matthew Eggerding
Counsel, Midstream

Attachments

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

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

**Response to Post-Draft Environmental Impact Statement
Environmental Information Request Issued January 27, 2017**

General Project Description

3. Address the issues raised in the following letters filed with the FERC during the draft environmental impact statement (EIS) comment period:
 - a. Accession number 20161107-0096 (U.S. Army Corps of Engineers [COE]);
 - b. Accession numbers 20161215-5124, 20161221-5281, 20161221-5281, and 20161223-5049 (BLM, U.S. Forest Service [FS], U.S. Geological Survey [USGS]);
 - c. Accession number 20161222-5394 (Commonwealth of Virginia);
 - d. Accession number 20161229-0033 (U.S. Environmental Protection Agency [EPA]);
 - e. Accession number 20160907-5211 and 20161028-5031 (re: emergency response services);
 - f. Accession number 20161222-5458 (Mr. Rubin's report);
 - g. Accession number 20161222-5459 (Roanoke County Hydrogeological Assessment);
 - h. Accession number 20161219-5056 (Johnson);
 - i. Accession number 20161222-5062 (Vance);
 - j. Accession number 20161222-5403 (Yellow Finch Lane);
 - k. Accession number 20161223-5090 (Four Corners Farm – re: shifting of alignment for Little Creek crossing);
 - l. Accession number 20161026-5020 (Bouldin); and
 - m. Accession numbers 20161222-5041 and 20161222-5118 (Besa).
 - n. Accession number 20160829-5096 and 20161223-5008 (Chasnoff) (request subsequently added by Commission Staff).

Response Submitted February 17, 2017:

- a. See Attachment DR4 General 3a.
- b. See Attachment DR4 General 3b1 (response to USGS). Mountain Valley expects to file responses to the other agency letters by February 23, 2017.
- c. Mountain Valley expects to file a response by February 23, 2017.

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

**Response to Post-Draft Environmental Impact Statement
Environmental Information Request Issued January 27, 2017**

- d. Mountain Valley expects to file a response by February 23, 2017.
- e. See Attachment DR4 General 3e.
- f. See Attachment DR4 General 3f.
- g. See Attachment DR4 General 3g.
- h. See Attachment DR4 General 3h.
- i. See Attachment DR4 General 3i.
- j. See Attachment DR4 General 3j.
- k. See Attachment DR4 General 3k-1 for the response to Accession number 20161223-5090. Mountain Valley also created a map of the Teels Creek and Little Creek area showing the Historical Migration Zone from the Scour Analysis and is included as Attachment DR4 General 3k-2.
- l. See Attachment DR4 General 3l.
- m. See Attachment DR4 General 3m, which addresses both letters.
- n. See Attachment DR4 General 3n.

Supplemental Response Submitted February 23, 2017:

- b. See Attachments DR4 General 3b2 (response to BLM) and 3b3 (response to FS).
- c. See Attachment DR4 General 3c.
- d. See Attachment DR4 General 3d.

Respondent: Ricky Myers
Position: Engineering Manager
Phone Number: 724-873-3640

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

**Response to Post-Draft Environmental Impact Statement
Environmental Information Request Issued January 27, 2017**

Wetlands

5. Provide information concerning hydrological resources requested by the FS in its letter dated December 20, 2016.

Response:

See Attachment DR4 Wetlands 5.

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
Phone Number: 724-873-3645
Date: February 23, 2017

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

**Response to Post-Draft Environmental Impact Statement
Environmental Information Request Issued January 27, 2017**

Land Use, Transportation, Recreation, and Visual Resources

10. File an analysis of the locations and acres of the pipeline route visible on the JNF from the ANST where the Scenic Integrity Objective (SIO) would be changed from High or Moderate to a lower SIO as a result of proposed Plan Amendment 1 to reallocate 186 acres to prescription area 5C.

Response:

Assuming Plan Amendment 1 is based on a 500-foot-wide corridor along the pipeline as analyzed in the DEIS, reallocation of the existing management prescriptions to prescription area 5C will affect approximately 207.5 acres. Some of these areas will retain their existing SIO, and others will change from Moderate to Low or from High to Moderate. Of the 207.5 acres that will be affected by the proposed reallocation, only 4.0 acres within the construction ROW and only 1.6 acres within the permanent ROW will experience a decrease in SIO level and be visible from the Appalachian National Scenic Trail (ANST). A breakdown of how these acres were identified is provided below.

Table 1 below identifies the acreages within the 500-foot-wide corridor, by management prescription and SIO, that will be reallocated. Acres are based on the October 2016 proposed route, revised in December 2016, and not on the October 2015 proposed route used to calculate acreage in the DEIS. Note that none of the areas in the JNF that are currently designated as management prescription 4A will be reallocated to 5C.

Table 1				
Area Within the 500-Foot-Wide Corridor Used for Plan Amendment 1, by Prescription Area and SIO Reallocation				
Prescription Area	Areas that Will Retain SIO After Reallocation to 5C (acres)	Areas that Will Change After Reallocation to 5C (acres)	Management Area	Total (acres)
8A1	3.4 (Low to Low) 125 (Moderate to Moderate)	0	Upper James/New River	128.4
6C	0	18.9 (Moderate to Low) 0.2 (High to Moderate)	Upper James	19.1
4J	0	43.0 (High to Moderate) 17.0 (Moderate to Low)	Upper James	60.0
Total	128.4	79.1		207.5

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

**Response to Post-Draft Environmental Impact Statement
Environmental Information Request Issued January 27, 2017**

As shown in Table 1, 128.4 acres out of the 207.5 acres that will be reallocated will not change SIO levels; only 79.1 acres will experience a change in SIO level.

As noted above, the acres in Table 1 reflect the decision by USFS that the area to be reallocated to management prescription 5C will be a 500-foot-wide corridor. The Project ROW will only be 125 feet wide during construction and 50 feet wide for the life of the Project. Of those 207.5 acres that will be reallocated under Plan Amendment 1 to management prescription 5C, approximately 48.3 acres will be within the 125-foot-wide construction ROW. Some of these areas will retain their existing SIO, and others will change from Moderate to Low or from High to Moderate. Table 2 below identifies the acreages within the 125-foot-wide construction ROW, by management prescription and SIO, that will be reallocated. Note that none of the areas in the JNF that are currently designated as management prescription 4A will be reallocated to 5C, so the acreage of the construction ROW in that management prescription is not included in Table 2.

Table 2 Area of the Construction ROW within the JNF, by Prescription Area and SIO Reallocation				
Prescription Area	Areas that Will Retain SIO After Reallocation to 5C (acres)	Areas that Will Change After Reallocation to 5C (acres)	Management Area	Total (acres)
8A1	4.2 (Low to Low) 25.4 (Moderate to Moderate)	0	Upper James/New River	29.6
6C	0	4.5 (Moderate to Low) 0.1 (High to Moderate)	Upper James	4.6
4J	0	9.8 (High to Moderate) 4.3 (Moderate to Low)	Upper James	14.1
Total	29.6	18.7		48.3

As shown in Table 2, 29.6 acres out of the 48.3 acres in the Project construction ROW that will be reallocated under Plan Amendment 1 will not change SIO levels; only 18.7 acres will experience a change in SIO level.

Construction ROW Visible from the ANST

Of the 48.3 acres within the construction ROW that will be reallocated from their existing management prescriptions to management prescription area 5C, approximately 13.1 acres will be visible from the Appalachian National Scenic Trail (ANST). This is demonstrated by the bare-earth viewshed analysis for the ANST, see Attachment DR4 Land Use 10. Some of these visible areas will retain their existing SIO, and others would change from

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

**Response to Post-Draft Environmental Impact Statement
Environmental Information Request Issued January 27, 2017**

Moderate to Low or from High to Moderate. Table 3 below identifies the area of construction ROW within each management prescription that will be visible from the ANST that will be reallocated, broken out by SIO. Note that none of the 4.6 acres that are currently in management prescription 6C that would be reallocated to management prescription 5C would be visible from the ANST.

Table 3 Area of the Construction ROW Visible from the ANST, by Prescription Area and SIO Reallocation				
Prescription Area	Areas that Will Retain SIO After Reallocation to 5C (acres)	Areas that Will Change After Reallocation to 5C (acres)	Management Area	Total (acres)
8A1	0 (Low to Low) 9.1 (Moderate to Moderate)	0	Upper James/New River	9.1
4J	0	4.0 (Moderate to Low)	Upper James	4.0
Total	9.1	4.0		13.1

As shown in Table 3, out of 13.1 acres in the construction ROW that will be reallocated to management prescription 5C and will be visible from the ANST, 9.1 acres will not change SIO levels and 4.0 acres will experience a change in SIO level.

Operation ROW Visible from the ANST

After construction, Mountain Valley will retain a 50-foot-wide permanent ROW. An estimated 5.3 acres of permanent ROW that will be reallocated from existing management prescriptions to management prescription 5C will be visible from the ANST. These 5.3 acres are within the area of visible construction right-of-way shown on Attachment DR4 Land Use 10. Some of these areas will retain their existing SIO, and others will change from Moderate to Low or from High to Moderate. Table 4 below identifies the acreages within the 50-foot-wide permanent ROW visible from the ANST, by management prescription and SIO, that will be reallocated.

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

**Response to Post-Draft Environmental Impact Statement
Environmental Information Request Issued January 27, 2017**

Table 4 Area of the Operation ROW Visible from the ANST, by Prescription Area and SIO Reallocation				
Prescription Area	Areas that Will Retain SIO After Reallocation to 5C (acres)	Areas that Will Change After Reallocation to 5C (acres)	Management Area	Total (acres)
8A1	0 (Low to Low) 3.7 (Moderate to Moderate)	0	Upper James/New River	3.7
4J	0	1.6 (Moderate to Low)	Upper James	1.6
Total	3.7	1.6		5.3

As shown in Table 4, 3.7 visible acres out of the 5.3 visible acres will not change SIO levels, and 1.6 acres would experience a change in SIO level. Of the 207.5 acres that will be affected by the proposed reallocation to management prescription 5C under Plan Amendment 1, only 5.3 acres within the permanent pipeline ROW will be visible from the ANST, and only 1.6 of these visible acres will experience a decrease in SIO.

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
Phone Number: 724-873-3645
Date: February 23, 2017

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

**Response to Post-Draft Environmental Impact Statement
Environmental Information Request Issued January 27, 2017**

Land Use, Transportation, Recreation, and Visual Resources

17. Document communications with the FS and BLM regarding the currently proposed pipeline route crossing of Craig Creek. Mountain Valley indicated to the FS that it went back to the original October 2015 route for the crossing of Craig Creek. The shapefiles submitted to the FS do not satisfy the FS requests, and that part of the route is inconsistent with Forest Plan standards and other guidance. That route also crosses an unnamed tributary which the FS said should be avoided.

Response Submitted February 17, 2017:

Mountain Valley is finalizing its evaluation of two alternative routing alignments between MPs 219.5 and 220.0 in the area of Craig Creek. Mountain Valley is consulting with the FS on the alternatives analysis. Mountain Valley expects to submit the final analysis by the end of February 2017.

Supplemental Response Submitted February 23, 2017:

An alternatives analysis in the area of Craig Creek is included as Attachment DR4 Land Use 17.

Respondent: Megan Neylon
Position: Supervisor - Environmental Permitting
Phone Number: 724-873-3645