

*The Culture Center*  
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EEO/AA Employer

March 8, 2018

Mr. Paul Friedman  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

RE: Mountain Valley Pipeline Project  
Proposed MVP-LY-051 Laydown Yard, Harrison County, WV  
FERC Docket No. CP 16-10  
FR: 15-67-MULTI-64

Dear Mr. Friedman:

We have reviewed the additional 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.

The submitted information states that Mountain Valley Pipeline (MVP) identified the need for a variance pipeline route in Braxton County, West Virginia. One of three (3) possible variances are proposed: variance route RA-MP-74.4(2) would reroute the pipeline to the east near milepost 74.7 before rejoining near milepost 74.8; variance route RA-MP074.7(6) would reroute the pipeline to the east as well, but the reroute would begin north of milepost 74.7 and revert back near milepost 74.8; the third option is to use the previously-surveyed route but with a 150-foot section of pipeline constructed above ground. The direct Area of Potential Effect (APE) for the current investigation is defined as the footprint of the proposed expansion areas.

Archaeological Resources:

Archaeological survey of the APE included the systematic excavation of 175 shovel probes. Disturbed soils, likely associated with extensive preparation for the construction of a residential subdivision or commercial shopping center, were encountered over the entire project area. The disturbed soils consist of introduced fill that has capped natural soils below. No cultural materials were identified. It is our understanding that any impacts resulting from the parcel's use as a laydown yard will be confined to the previously disturbed soils. As a result, we concur that use of the parcel as a laydown yard will have no effect on archaeological historic properties and that no further archaeological investigations are necessary.

Architectural Resources:

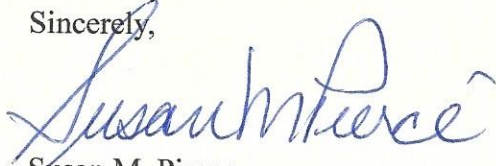
The three (3) proposed variance routes in Braxton County would relocate the pipeline route at the most by less than 0.0625 miles. Consultants for MVP surveyed the area previously and found no architectural resources within the established direct or visual APEs. We concur the three (3) proposed variances will

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have *no effect* on above-ground resources. No further consultation is necessary regarding architectural resources near the proposed variances; however, we ask that you contact our office if your 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 blue ink that reads "Susan M. Pierce". The signature is written in a cursive style with a large, looping initial "S".

Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/LLD/MKS

CC: Ms. Evelyn Tidlow, GAI Consultants