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EEO/AA Employer

May 17, 2018

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

RE: Mountain Valley Pipeline Project
Proposed Access Roads MVP-BR-103.01A and MVP-NI-145.02, Workspace MVP-ATWS-1537,
and Mainline Variance MVP-NI-MP-115.8
FERC Docket No. CP 16-10
FR: 15-67-MULTI-92

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) proposes four new variances that fall outside of areas previously surveyed for cultural resources. The variances consist of one new access road (MVP-BR-103.01A) in Braxton County near MP 75.30, one new access road (MVP-NI-145.02) in Nicholas County near MP 115.85, one new workspace (MVP-ATWS-1537) in Nicholas County near MP 119.20, and one minor reroute of the pipeline center line (MVP-NI-MP-115.8) between MP 115.75-115.85 in Nicholas County, West Virginia. The direct and indirect Areas of Potential Effect (APE) that were defined for this survey are consistent with those for the previously considered pipeline project.

Archaeological Resources:

Archaeological survey of the proposed variances included pedestrian reconnaissance over the entire direct APE. Most of the APE was observed to consist of steeply sloped, previously disturbed, or flood-scoured terrain. In addition to visual inspection, six shovel probes were excavated within the area proposed for the access road in Nicholas County. No rockshelters or archaeological resources were discovered. As a result, we concur that no further archaeological survey is necessary that the proposed variances will have no effect on archaeological historic properties.

Architectural & Railroad Resources:

As noted in the documentation packet, the two proposed temporary access roads—MVP-BR-103.01A in Braxton County and MVP-NI-145.02 in Nicholas County—will make use of previously-existing roadways near the pipeline route. It is our understanding neither will require additional tree clearance. Therefore, both temporary access roads will have *no effect* on historic architectural resources.

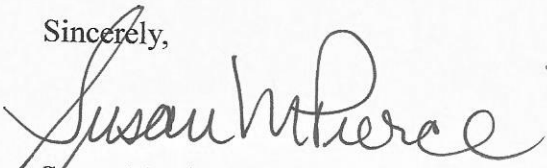
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Concerning the main line variance (MVP-NI-MP-115.8), no additional resources were documented within the modified visual area of potential effects. Thus, the project modification will have *no effect* on historic architectural resources.

Finally, the proposed workspace (MVP-ATWS-1537) in Nicholas County will be located near the Pardee and Curtin Lumber Company Railroad (NI-0231), which our office considered *potentially eligible* for inclusion in the National Register of Historic Places under Criterion A (see our office's letter dated March 7, 2018; FR:15-67-MULTI-62). Since the effects on the railway will be minor in comparison to the whole of that linear resource, and temporary, we concur with Search's recommendation that said effects will not be adverse. No further consultation is necessary regarding above-ground resources located near the aforementioned four project variances; 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,



Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD/MKS

CC: Ms. Evelyn Tidlow, GAI Consultants