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May 21, 2018

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

RE: Mountain Valley Pipeline Project
Archaeological Technical Report – Addendum 13 to Volume IV
Summers County, West Virginia
FR: 15-67-MULTI-93

Dear Mr. Friedman:

We have reviewed the technical report titled *Mountain Valley Pipeline, Addendum 13 to Volume IV, Phase I and II Archaeological Investigations, Site 46SU751, Tract WV-SU-5876, Summers County, West Virginia*. 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 technical report documents the results of archaeological survey conducted within the proposed limits of disturbance for access road (AR) MVP-SU-205 and associated additional temporary workspace (ATWS) MVP-ATWS-1518 near Pence Springs, Summers County, WV. The direct Areas of Potential Effect (APE) that were defined for this survey are consistent with those for the previously considered pipeline project. A total of 1.73 acres were surveyed. Survey of the indirect APE was previously reported on in Volume IV and Addendum 1 to Volume IV.

The Phase I survey, which included shovel probe and test unit excavation and pedestrian reconnaissance, resulted in the identification of site 46SU751, a multicomponent artifact scatter, within the area proposed for the ATWS. During the survey 110 prehistoric artifacts were recovered from stratified contexts, including thermally altered rock, informal lithic tools and a Late Woodland triangular projectile point. In addition, five historic period artifacts were recovered that likely represent casual discard rather than substantive use of the area. Because the prehistoric component demonstrated the potential to contain significant deposits, Phase II investigations were undertaken when it was determined the site could not be avoided by the proposed project.

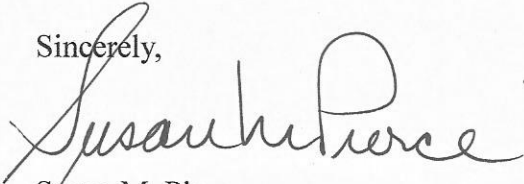
During the Phase II field work, a total of 124 close-interval shovel probes and three 1x1-meter test units were excavated. This resulted in the recovery of an additional 267 artifacts, including a small number amount of historic era material, additional Late Woodland project points, Late Woodland ceramic fragments similar to the Lick Creek ware group, flake tools, possible cobble tools, and an Early Archaic projectile point. Most of the artifacts, including all the Late Woodland specimens, were recovered from the upper 30 centimeters of soils. No cultural features were identified. In addition, soil stratigraphic observations from this site as well as those within proximity suggest that significant archaeological

May 21, 2018
Mr. Friedman
FR: 15-67-MULTI-93
Page 2

deposits are not preserved at 46SU751. Rather, the site is interpreted as a low-density outlier of sites located upstream and downstream. As a result, we concur that 46SU751 is not eligible for inclusion in the National Register of Historic Places and that development of the access road and ATWS will have no effect on historic properties.

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, at (304) 558-0240.*

Sincerely,

A handwritten signature in cursive script that reads "Susan M. Pierce". The signature is written in dark ink and is positioned above the typed name and title.

Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD

CC: Ms. Evelyn Tidlow, GAI Consultants