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EEO/AA Employer

June 6, 2018

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

RE: Mountain Valley Pipeline Project
FERC Docket No. CP 16-10
Proposed Parking Area MVP-PA-001, Access Road MVP-HA-051 and Avoidance Plan for Site
46HS152, Access Road MVP-LE-054.01, Workspace MVP-ATWS-1548, Access Road MVP-
WB-133.02, and Workspace MVP-ATWS-1556
FR: 15-67-MULTI-99 & 15-67-MULTI-100

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, which is dated May 31, 2018, states that Mountain Valley Pipeline (MVP) has proposed six new variances to the proposed project. The variances consist of Parking Area MVP-PA-001 in Wetzel County, Access Road MVP-HA-051 in Harrison County, Access Road MVP-LE-054.01 and Workspace MVP-ATWS-1548 in Lewis County, and Access Road MVP-WB-133.02 and Workspace MVP-ATWS-1556 in Webster County. The direct and indirect Areas of Potential Effect (APE) that have been defined for the variances are consistent with those associated with the previously considered project. Additional information dated June 5, 2018 indicates that MVP will not pursue the proposed modification to Access Road MVP-HA-051 in Harrison County and that the original proposed alignment will be used instead. Survey of the original alignment was conducted in 2015 with negative results. We concurred with recommendations made in this report in our October 6, 2015 letter.

Archaeological Resources:

According to the submitted materials, archaeological survey, including pedestrian reconnaissance and shovel probe excavation, was conducted within the areas proposed for the project variances. Previous disturbance or sloped terrain were observed over much of the APE. Shovel probe excavation was conducted within area proposed for Access Road MVP-HA-051 in Harrison County, WV. This resulted in the identification of one new archaeological site, 46HS152. The site is described as a small lithic scatter consisting of four pieces of chert debitage and one jasper biface that likely dates to the Middle to Late Archaic Period. As mentioned above, it is our understanding that the proposed modification to Access Road MVP-HA-051 has been abandoned and that the originally proposed road corridor will be used instead. Protective fencing will be placed along the edge of the limits of disturbance (LOD) within

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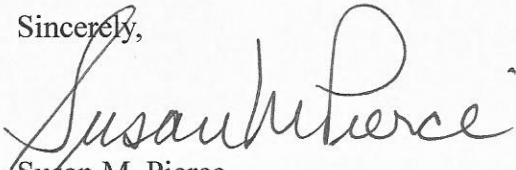
the vicinity of the site. With the understanding that the site will be avoided by use of the originally proposed alignment, we concur that the project will have no effect on 46HS152. We also concur that the addition of these variances to the Mountain Valley Pipeline Project will have no effect on archaeological historic properties. No further consultation is necessary.

Architectural Resources:

We have reviewed the submitted information and determined no further consultation is necessary regarding the aforementioned six (6) project elements. Only two (2) of the project areas will require tree clearance. Those two elements are visually shielded by intervening topography and vegetation. No new or additional historic architectural resources were documented within any of the project elements' direct or indirect APEs. Therefore, it is our opinion the proposed project access roads and workspaces will have *no effect* on historic architectural resources. No further consultation is necessary regarding architectural resources; 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