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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
Access Road MVP-BR-090.01
Access Road MVP-BR-090.03
Workspace MVP-ATWS-1553
FR: 15-67-MULTI-98

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) has proposed three variances to the proposed project in Braxton County, WV between MP 69.5 and 70.1. The proposed variances consist of Access Road MVP-BR-090.03, Workspace MVP-ATWS-1553, and Access Road MVP-BR-090.01. All proposed variances are completely or partially located within the Cunningham (Losch) Farmstead, which is considered eligible for listing in the National Register of Historic Places. The direct Area of Potential Effect (APE) that has been defined for the variances is consistent with that for the previously considered project.

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 was observed over much of the APE. With the exception of a single modern nail, no cultural materials were recovered. No archaeological sites were identified. As a result, we 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:

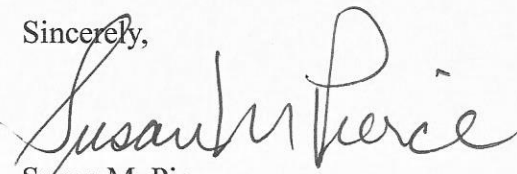
We have reviewed the submitted information regarding the two (2) proposed access roads and workspace, and concur no further consultation is necessary for these project elements. The access roads will not require significant tree removal and will largely make use of existing roadways. The workspace will also not require additional tree clearance. Notably, the project areas in question have been timbered recently, and though they sit within or near the boundaries of the Cunningham Farmstead (BX-0351),

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which has been deemed eligible for inclusion in the National Register, any effects will be mitigated via the established treatment plans. Thus, no further consultation is necessary regarding the project elements in question; 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 cursive script that reads "Susan M. Pierce". The signature is written in dark ink and is positioned above the printed name and title.

Susan M. Pierce
Deputy State Historic Preservation Officer

SMP/LLD/MKS

CC: Ms. Evelyn Tidlow, GAI Consultants