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July 10, 2018

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Mountain Valley Pipeline, LLC
Docket No. CP16-10-000
Updated Variance Request No. MVP-003


Dear Ms. Bose:

On October 13, 2017, the Federal Energy Regulatory Commission issued an order granting a Certificate of Public Convenience and Necessity to Mountain Valley Pipeline, LLC. On June 7, 2018, Mountain Valley filed Variance Request No. MVP-003. In this filing, Mountain Valley updates that variance request. A detailed variance request form and supporting documents are attached. Mountain Valley requests approval by July 11, 2018.

If you have any questions, please do not hesitate to contact me at (412) 553-5786 or meggerding@eqt.com. Thank you.

Respectfully submitted,

MOUNTAIN VALLEY PIPELINE, LLC
by and through its operator,
EQM Gathering Opco, LLC

By: 
Matthew Eggerding
Senior Counsel, Midstream

Attachments

cc: All Parties
Paul Friedman, OEP
Lavinia DiSanto, Cardno, Inc.
Doug Mooneyhan, Cardno, Inc.

MVP Variance Request Form



Variance Request No.: *MVP-003*

Date Approval Requested by Contractor: _____
 Date Submitted by Chief Inspector to LEI: _____
 Date Received by FERC: _____

FERC Approval Reference No.: _____

Requested By: *John Uhrin*

Spread: *Project Wide* Variance Type: *PM*

Request Prepared By *: *Phil Veneziano*

Variance Sequence Number: *MVP-003*

* The FERC compliance monitor should be alerted and given a copy of the draft variance for review prior to submittal

Location (Use either Station or Milepost)

Station: *Project Wide* To: _____ Milepost: _____ To: _____

Alignment Sheet Number: *N/A* Tract No.: *All*

Current Land Use/ Vegetative Cover: *All* Other Agency Jurisdiction: *None*

Nearby Features (Water body, T&E Habitat, Wetland, Noxious Weed Area, Residence (distance), Cultural Resource Site (distance) etc.):

- Noxious Weed Area Raptor Nest Residence (Distance)
- T/E Species Habitat Cultural Resource Site Water Well
- Other (Specify): *Site Specific*

In or w/in 50 feet of a wetland: Yes No

In or w/in 50 feet of a waterbody: Yes No

Wetland or Waterbody ID: *Site Specific*

Additional Stream footage impacted: *None* Additional Wetland impacts: *N/A*

Net acreage affected: *N/A*

Tree Clearing Required: *N/A* Acreage of tree clearing: *N/A*

Variance Level: Level 1 Level 2 Level 2.5 Level 3

Variance From: Permit Plan Procedures EPPM Specification Drawing Mitigation Measure

Line List Other: Describe: _____

Detailed Description of Variance: Attachments? Yes No Photos? Yes No

Update to the version of Variance Request No. MVP-003 submitted to FERC on June 7, 2018.

 The FEIS for the MVP Project confirmed that pipeline construction would generally occur during "daylight hours." See page 2-55 ("Work would be conducted during daylight hours, except where the pipe would be installed using the HDD and bore methods, which require around-the-clock operations and typically last a few days to a few weeks."); page 4-390 ("Construction activities would be scheduled to take advantage of daylight hours."); page 4-535 ("Sound level increases during pipeline construction would be intermittent and would generally occur during daylight hours, with the possible exception of some HDD activities."). The FEIS also contemplates working before and after daylight hours for pipeline construction using artificial lighting. See page 4-204 ("Mountain Valley and Equitrans would only use artificial lighting as necessary during construction between the hours of 7:00 am and 7:00 pm, except for during emergencies or limited instances of 24-hour construction activities (e.g., HDD during construction along the EEP).").

Mountain Valley is submitting this variance to further define the hours when pipeline construction activities will generally occur Project-wide. The Federal Aviation Administration defines "Night" as "the time between the end of evening civil twilight and the beginning of morning civil twilight[.]" 14 C.F.R. § 1.1. Using this definition, Mountain Valley proposes to use the morning and evening civil twilight times published by the U.S. Naval Observatory for Roanoke, Virginia as the general start and stop times for activities associated with pipeline construction, except when morning civil twilight would be after 7:00 AM (in which case the start time is adjusted to 7:00 AM) and the evening civil twilight would be prior to 7:00 PM (in which case the stop time is adjusted to 7:00 PM). See Attachment A. For compressor stations, Mountain Valley expects to generally work from 7:00 AM to 7:00 PM. This variance does not extend the work hours for the Project; instead, this variance further defines the meaning of "daylight" or "daytime" for purposes of Project construction. Any request to extend work hours will be handled in a subsequent variance.

The times shown in Attachment A are generally-applicable Project-wide. However, work may occur outside of these windows in certain circumstances, including 24-hour drilling for HDD or bores, 24-hour work at compressor stations (as approved by FERC), extended work to comply with stream crossing time requirements, extended work due to upcoming inclement weather, extended work to resolve a safety issue, hydrostatic testing, tie-ins, and other similar circumstances.

The FEIS for the Project summarized the local noise ordinances and found that "the local noise ordinances are less stringent than the FERC noise criterion of 55 dBA Ldn." See Section 4.11.2.2. The FEIS concluded that the Project "would not result in significant noise impacts on residents and the surrounding communities during construction" because of "the temporary nature of construction" and noise mitigation measures such as "limiting the great majority of construction to daytime." See Section 5.1.11.2. This variance is fully justified by the FEIS.

List Attachments:	Attachment 1: MVP Construction Times		
Variance Justification: See description above.			
For MVP Use Only			
Additional Surveys Required	Surveyed Corridor Description		Additional Surveys Completed
Cultural Survey <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N/A		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
T & E Survey <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Waterbodies/Wetlands <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Proof of Previous Biological and Cultural Survey Clearance N/A			
Landowner: Land Agent Contact Landowner Approval <input type="checkbox"/> Yes <input type="checkbox"/> No Obtained			
Sign Off:	Name	Signature	Date
Construction Manager	John Uhrin	<i>John Uhrin</i>	6/5/2018
Lead Environmental Inspector	n/a		
Third Party Compliance Manager or monitor	n/a		
ROW Land Agent *	n/a		
Environmental Supervisor	Megan Neylon	<i>Megan Neylon</i>	6/5/2018
*signature denotes confirmed landowner approval			

For FERC Compliance Monitor and Compliance Manager Use Only

Variance Approved:		Variance Denied:		Beyond Authority:	
Signature:	_____				
Date:					
Stipulations:					

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Spread No.:	<u>Project Wide</u>	Variance Request No.:	<u>MVP-003</u>
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VARIANCE CONDITIONS

Name:		Title:		Organization:	
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Conditions:

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Name:		Title:		Organization:	
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Conditions:

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Name:		Title:		Organization:	
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Conditions:

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Mountain Valley Pipeline Project
2018 Generally-Applicable Start and Stop Times for Pipeline Construction Activities*

Day	June		July		August		September		October		November		December	
	Start	End	Start	End	Start	End	Start	End	Start	End	Start	End	Start	End
1	5:31 AM	9:05 PM	5:32 AM	9:14 PM	5:55 AM	8:56 PM	6:23 AM	8:15 PM	6:49 AM	7:28 PM	7:00 AM	7:00 PM	6:46 AM	7:00 PM
2	5:30 AM	9:06 PM	5:32 AM	9:14 PM	5:56 AM	8:54 PM	6:24 AM	8:13 PM	6:50 AM	7:27 PM	7:00 AM	7:00 PM	6:47 AM	7:00 PM
3	5:30 AM	9:07 PM	5:33 AM	9:14 PM	5:57 AM	8:53 PM	6:25 AM	8:12 PM	6:50 AM	7:25 PM	7:00 AM	7:00 PM	6:48 AM	7:00 PM
4	5:29 AM	9:07 PM	5:33 AM	9:14 PM	5:58 AM	8:52 PM	6:26 AM	8:10 PM	6:51 AM	7:24 PM	6:20 AM	7:00 PM	6:48 AM	7:00 PM
5	5:29 AM	9:07 PM	5:34 AM	9:14 PM	5:59 AM	8:51 PM	6:27 AM	8:08 PM	6:52 AM	7:22 PM	6:21 AM	7:00 PM	6:49 AM	7:00 PM
6	5:29 AM	9:08 PM	5:34 AM	9:13 PM	6:00 AM	8:50 PM	6:27 AM	8:07 PM	6:53 AM	7:21 PM	6:22 AM	7:00 PM	6:50 AM	7:00 PM
7	5:29 AM	9:08 PM	5:35 AM	9:13 PM	6:01 AM	8:49 PM	6:28 AM	8:05 PM	6:54 AM	7:20 PM	6:23 AM	7:00 PM	6:51 AM	7:00 PM
8	5:28 AM	9:09 PM	5:36 AM	9:13 PM	6:01 AM	8:48 PM	6:29 AM	8:04 PM	6:55 AM	7:18 PM	6:24 AM	7:00 PM	6:52 AM	7:00 PM
9	5:28 AM	9:10 PM	5:36 AM	9:12 PM	6:02 AM	8:46 PM	6:30 AM	8:02 PM	6:56 AM	7:17 PM	6:25 AM	7:00 PM	6:53 AM	7:00 PM
10	5:28 AM	9:11 PM	5:37 AM	9:12 PM	6:03 AM	8:45 PM	6:31 AM	8:01 PM	6:56 AM	7:15 PM	6:26 AM	7:00 PM	6:53 AM	7:00 PM
11	5:28 AM	9:11 PM	5:38 AM	9:12 PM	6:04 AM	8:44 PM	6:32 AM	7:59 PM	6:57 AM	7:14 PM	6:27 AM	7:00 PM	6:54 AM	7:00 PM
12	5:28 AM	9:11 PM	5:38 AM	9:11 PM	6:05 AM	8:43 PM	6:33 AM	7:58 PM	6:58 AM	7:13 PM	6:28 AM	7:00 PM	6:55 AM	7:00 PM
13	5:28 AM	9:12 PM	5:39 AM	9:11 PM	6:06 AM	8:41 PM	6:33 AM	7:56 PM	6:59 AM	7:11 PM	6:29 AM	7:00 PM	6:56 AM	7:00 PM
14	5:28 AM	9:12 PM	5:40 AM	9:10 PM	6:07 AM	8:40 PM	6:34 AM	7:55 PM	7:00 AM	7:10 PM	6:30 AM	7:00 PM	6:56 AM	7:00 PM
15	5:28 AM	9:12 PM	5:41 AM	9:10 PM	6:08 AM	8:39 PM	6:35 AM	7:53 PM	7:00 AM	7:08 PM	6:31 AM	7:00 PM	6:57 AM	7:00 PM
16	5:28 AM	9:13 PM	5:41 AM	9:09 PM	6:09 AM	8:38 PM	6:36 AM	7:51 PM	7:00 AM	7:07 PM	6:32 AM	7:00 PM	6:58 AM	7:00 PM
17	5:28 AM	9:13 PM	5:42 AM	9:08 PM	6:10 AM	8:36 PM	6:37 AM	7:50 PM	7:00 AM	7:06 PM	6:33 AM	7:00 PM	6:58 AM	7:00 PM
18	5:28 AM	9:13 PM	5:43 AM	9:08 PM	6:11 AM	8:35 PM	6:38 AM	7:48 PM	7:00 AM	7:05 PM	6:34 AM	7:00 PM	6:59 AM	7:00 PM
19	5:28 AM	9:14 PM	5:44 AM	9:07 PM	6:12 AM	8:33 PM	6:39 AM	7:47 PM	7:00 AM	7:03 PM	6:35 AM	7:00 PM	6:59 AM	7:00 PM
20	5:28 AM	9:14 PM	5:45 AM	9:06 PM	6:12 AM	8:32 PM	6:39 AM	7:45 PM	7:00 AM	7:02 PM	6:36 AM	7:00 PM	7:00 AM	7:00 PM
21	5:29 AM	9:14 PM	5:45 AM	9:05 PM	6:13 AM	8:31 PM	6:40 AM	7:44 PM	7:00 AM	7:01 PM	6:37 AM	7:00 PM	7:00 AM	7:00 PM
22	5:29 AM	9:14 PM	5:46 AM	9:05 PM	6:14 AM	8:29 PM	6:41 AM	7:42 PM	7:00 AM	7:00 PM	6:37 AM	7:00 PM	7:00 AM	7:00 PM
23	5:29 AM	9:14 PM	5:47 AM	9:04 PM	6:15 AM	8:28 PM	6:42 AM	7:41 PM	7:00 AM	7:00 PM	6:38 AM	7:00 PM	7:00 AM	7:00 PM
24	5:29 AM	9:15 PM	5:48 AM	9:03 PM	6:16 AM	8:26 PM	6:43 AM	7:39 PM	7:00 AM	7:00 PM	6:39 AM	7:00 PM	7:00 AM	7:00 PM
25	5:30 AM	9:15 PM	5:49 AM	9:02 PM	6:17 AM	8:25 PM	6:44 AM	7:37 PM	7:00 AM	7:00 PM	6:40 AM	7:00 PM	7:00 AM	7:00 PM
26	5:30 AM	9:15 PM	5:50 AM	9:01 PM	6:18 AM	8:23 PM	6:44 AM	7:36 PM	7:00 AM	7:00 PM	6:41 AM	7:00 PM	7:00 AM	7:00 PM
27	5:30 AM	9:15 PM	5:51 AM	9:00 PM	6:19 AM	8:22 PM	6:45 AM	7:34 PM	7:00 AM	7:00 PM	6:42 AM	7:00 PM	7:00 AM	7:00 PM
28	5:31 AM	9:15 PM	5:51 AM	8:59 PM	6:20 AM	8:21 PM	6:46 AM	7:33 PM	7:00 AM	7:00 PM	6:43 AM	7:00 PM	7:00 AM	7:00 PM
29	5:31 AM	9:15 PM	5:52 AM	8:59 PM	6:21 AM	8:19 PM	6:47 AM	7:31 PM	7:00 AM	7:00 PM	6:44 AM	7:00 PM	7:00 AM	7:00 PM
30	5:32 AM	9:15 PM	5:53 AM	8:58 PM	6:21 AM	8:18 PM	6:48 AM	7:30 PM	7:00 AM	7:00 PM	6:45 AM	7:00 PM	7:00 AM	7:00 PM
31			5:54 AM	8:57 PM	6:22 AM	8:16 PM			7:00 AM	7:00 PM			7:00 AM	7:00 PM

* For activities associated with construction of compressor stations, the start time is 7:00 AM and the end time is 7:00 PM. Work may occur outside of these windows in certain circumstances, including 24-hour drilling for HDD or bores, 24-hour work at compressor stations (as approved by FERC), extended work to comply with stream crossing time requirements, extended work due to upcoming inclement weather or to resolve safety issues, hydrostatic testing, tie-ins, and other similar circumstances.