



January 8, 2018

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**Randall Reid-Smith, Commissioner**

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

RE: Mountain Valley Pipeline Project  
Cultural Resources Survey Report: Addendum 3 to Volume I  
Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia  
FR: 15-67-MULTI-52

Dear Mr. Friedman:

We have reviewed the report, "Mountain Valley Pipeline Project, Cultural Resources Survey, Addendum 3 to Volume I, Wetzel, Harrison, Doddridge, and Lewis Counties, West Virginia" that Tetra Tech prepared for the aforementioned 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 technical report documents the results of architectural and archaeological surveys within areas of change to the proposed route's direct Area of Potential Effect (APE) and on tax parcels where land access was recently acquired. The APE that was defined for this survey is consistent with the APE for the previously considered pipeline corridor. It is our understanding that survey of the proposed project has been completed in Wetzel and Doddridge Counties. However, due to land access issues, that approximately 27.66 acres remain to be surveyed in Harrison and Lewis Counties and that these areas will be addressed in subsequent addendum reports. According to the report, no additional architectural resources were identified during the survey.

Archaeological survey within the amendment areas included pedestrian reconnaissance and the excavation of a total of 164 shovel probes. This resulted in the identification of three new archaeological sites, 46HS147, 46WZ164, and 46DO120. Sites 46WZ164 and 46DO120 are described as isolated finds recovered from disturbed contexts. Due to a lack of integrity, we concur that these resources are not eligible for inclusion in the National Register of Historic Places and that no further work is necessary.

Site 46HS147 is the remains of an oil and gas well that was drilled in 1935. The site is comprised of a cement well cap, a rectangular concrete-block footing, a cluster of at least five concrete blocks, and eight artifacts (four cut nails, three wire nails, and one bolt). All artifacts were recovered from the upper 10 centimeters of the A horizon. Archival records indicate the well was drilled by well operators J.M. Raad and Wm. Moses out of Salem, WV. Additional investigations would be needed to determine whether any additional structural remnants are present. However, it is our understanding that the site is located outside of the currently proposed limits of disturbance (LOD) and will not be impacted by

January 8, 2018  
Ms. M. Landfried Neylon  
FR: 15-67-MULTI-52  
Page 2

construction activities. In addition, protective fencing will be placed along the LOD closest to the site's boundary. As a result, we concur that the proposed project will have no effect on 46HS147 and that no further work is necessary. Please contact our office if the proposed project changes.

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