

**Mountain Valley Pipeline, LLC
Mountain Valley Pipeline Project
Docket No. CP16-10-000**

**Responses to Environmental Information Request
Dated December 24, 2015**

Federal Energy Regulatory Commission

Request:

General

1. File copies of, or provide an anticipated submittal date for, all outstanding plans and studies that Mountain Valley indicated were pending, such as, but not limited to:
 - a. Project-wide Erosion and Sediment Control Plan (ESCP);

Response submitted January 15, 2016:

The Erosion and Sediment Control Plans for the project are in development. Due to the differing state and regulatory requirements, the plans will be produced in two applications, one for Virginia and one for West Virginia. Mountain Valley expects to submit it by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Mountain Valley submitted the Erosion and Sediment Control Plans for West Virginia pipelines and compressor stations to the West Virginia Department of Environmental Protection on February 23, 2016. A copy is included as Attachment General 1a-1.

Mountain Valley submitted the General Erosion & Sediment Control Specification for Virginia to the Virginia Department of Environmental Quality on February 11, 2016. A copy is included as Attachment General 1a-2.

- b. Karst-specific ESCP;

Response submitted January 15, 2016:

Karst-specific erosion and sedimentation control plans will be submitted to FERC as part of the overall Project erosion and sedimentation control plan. Mountain Valley expects to submit it by February 26, 2016 (see response to subpart (a)).

Supplemental Response submitted February 26, 2016:

A karst-specific erosion and sedimentation control plan for West Virginia is included in the project-specific Erosion and Sediment Control Plan for pipelines provided as Attachment General 1a-1.

A karst-specific erosion and sedimentation control plan for Virginia is included as Attachment General 1b.

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d. Spill Prevention, Control and Countermeasures Plan;

Response submitted January 15, 2016:

The Spill Prevention, Control and Countermeasures Plans for the project are in development. Due to the differing state and regulatory requirements, the plans will be produced in two applications, one for Virginia and one for West Virginia. Mountain Valley expects to submit it by February 26, 2016.

Supplemental Response submitted February 26, 2016:

The Spill Prevention, Control and Countermeasures Plan for each state are included as Attachment General 1d-1 (West Virginia) and Attachment General 1d-2 (Virginia).

d. Compensatory Wetland Mitigation Plan;

Response submitted January 15, 2016:

A compensatory wetland mitigation plan is in development. Mountain Valley expects to submit it by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Mountain Valley included the compensatory wetland mitigation plan for each U.S. Army Corps district with the Nationwide Permit Applications that were submitted on February 25, 2016. The compensatory wetland mitigation plans are provided as Attachments General 1e-1 (Huntington District), 1e-2 (Pittsburgh District), and 1e-3 (Norfolk District).

i. Unanticipated Discovery of Contamination Plan;

Response submitted January 15, 2016:

An unanticipated discovery of contamination plan will be submitted to FERC as part of the overall Project SPCC plan. A final SPCC plan is in development Mountain Valley expects to submit it by February 26, 2016 (see response to subpart (d)).

Supplemental Response submitted February 26, 2016:

The Unanticipated Discovery of Contamination Plan is included as Attachment General 1i.

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k. Geotechnical Landslide Evaluation;

Response submitted January 15, 2016:

Mountain Valley Pipeline has completed the field reviews of the 26 areas listed in Table 6.4-6. The results and recommendations from said reviews, including mitigation measures, are being compiled. Mountain Valley expects to submit it by February 26, 2016.

Supplemental Response submitted February 26, 2016:

A Landslide Mitigation Plan is included as Attachment General 1k.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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4. Section 2.1.1.5 stated that Mountain Valley is continuing to evaluate specific karst areas, and the project's potential impacts on groundwater. Provide a schedule for filing this information with the FERC.

Response submitted January 15, 2016:

Mountain Valley Pipeline continues its efforts to gain permission from property owners to access properties along the proposed alignment in karst terrain in order to conduct a karst hazards survey. Mountain Valley Pipeline will attempt to complete additional karst surveys in early February 2016. Mountain Valley expects to provide any additional data acquired during that time by February 26, 2016.

Supplemental Response submitted February 26, 2016:

An updated Karst Hazards Assessment Report is included as Attachment RR2-4 and includes data acquired since October 2015. Due to extreme weather in the month of February, Mountain Valley has not been able to complete a karst assessment on all necessary tracts. In addition, Mountain Valley continues its efforts to gain permission from property owners to access properties along the proposed alignment in karst terrain in order to finalize the karst hazards survey. Additional surveys are scheduled for March. Mountain Valley expects to submit a final Karst Hazards Assessment Report to FERC by April 22, 2016.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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16. If pipeline trenching through karst terrain encounters sediment filled, pinnacled epi-karst features, and minor route adjustments are not feasible, discuss how industry standard erosion sediment controls would be deployed to sufficiently prevent raveling of soils/sediment to the groundwater system, especially during precipitation events over the exposed trench line.

Response submitted January 15, 2016:

This will be included in the Project-specific erosion and sediment control plan, with specific references to erosion and sediment control measures to be implemented in karst terrain. Mountain Valley expects to submit the plan by February 26, 2016.

Supplemental Response submitted February 26, 2016:

A karst-specific erosion and sedimentation control plan for West Virginia is included in the project-specific Erosion and Sediment Control Plan provided as Attachment General 1a-1.

A karst-specific erosion and sedimentation control plan for Virginia is included as Attachment General 1b.

Mountain Valley will maximize construction safety by minimizing the accumulation of precipitation in the trench using best management practices (e.g., preventing storm water overland flow from entering the trench; retaining and dewatering accumulated precipitation that falls into the trench), regardless of whether the construction activity is occurring in karst. These practices will provide for more stable trench walls and safer working conditions.

Additional vigilance and storm water management practices will be employed when construction is occurring in karst terrain. Mountain Valley prepared a Karst Mitigation Plan that addresses avoidance, inspection, mitigation and stabilization of karst features. Mountain Valley will deploy a karst specialist team during land clearing and construction in karst terrain in order to directly assess karst hazards and provide recommendations to Mountain Valley's construction team that minimize disturbance. One important function of the karst specialist is to conduct a detailed, phased inspection of karst features that are encountered during construction. Based on these data the karst specialist will provide recommended avoidance or mitigation measures that include storm water management and erosion and sedimentation control.

These measures would include minimizing the time that construction occurs in karst terrain; ensuring that overland flow of storm water and other surface flow is not directed toward and specifically diverted from the trench and karst feature; isolating a karst feature in the trench with silt fencing and sandbags to prevent precipitation that falls into the trench during a storm event from accumulating in the feature; dewatering the trench portion where precipitation has been

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retained so that it does not flow into the karst feature; if the karst specialist identifies a feature as particularly vulnerable to soil raveling, the feature will be armored with six inches of stone aggregate to dissipate precipitation that falls directly onto the feature; and finally re-grading to original contours after trenching and backfilling are completed.

The on-site karst specialist will inspect the feature during construction and document any notable changes that may indicate soil raveling. If such is observed, the karst specialist will notify Mountain Valley immediately, recommend stabilization measures be implemented, and Mountain Valley will contact agencies as appropriate. Stabilization measures would include reverse-gradient aggregate fill in areas where soil raveling is observed to stabilize the feature and arrest soil and sediment migration into the underlying karst system.

Respondent: Megan Neylon
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17. As previously requested in our comments dated August 11, 2015, identify any waterbodies that may be affected by construction of the proposed compressor stations and meter stations, and use of pipe or contractor yards, and new or existing access roads that may be improved. Provide a discussion of measures that would be implemented to avoid, reduce, or mitigate impacts on waterbodies during construction of aboveground facilities or ancillary use areas.

Response submitted January 15, 2016:

Mountain Valley expects to submit an updated Table 2-A-2 by February 26, 2016. The updated table will include a complete list of impacts to waterbodies from the Project temporary and permanent facilities. Section 2.2.5 provides a discussion of measures that would be implemented to avoid, reduce, or mitigate impacts on waterbodies during construction and operation of the Project.

Supplemental Response submitted February 26, 2016:

A revised Table 2-A-2 is included as Attachment RR2-17. The revised table provides a complete list of waterbody crossings from the Project facilities as included in Mountain Valley's Nationwide Permits to the respective U.S. Army Corps district offices.

Implementation of the FERC Plan and Procedures and Mountain Valley's Project-specific E&SCP, specifically with respect to construction time windows, erosion and sedimentation control, bank stabilization, and bank revegetation, will minimize short- and long-term impacts on the waterbodies due to construction of the Project. Locations of proposed compressor stations, pipe yards, laydown yards, and new access roads will be adjusted to avoid impacts to streams where practicable.

Respondent: Megan Neylon
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18. Clarify if the Little Kanawha River (MP 75.0) and the Pigg River (MP 286.3) are major (more than 100-feet-wide) or intermediate waterbody crossings. Revise section 2.2.1.3 and table 2.2-5, accordingly.

Supplemental Response submitted January 27, 2016:

The Little Kanawha River has been re-classified as a major waterbody. The Pigg River has been re-classified as an intermediate waterbody. According to the FERC Wetland and Waterbody Construction and Mitigation Procedures, FERC waterbody classification is determined as the width from the water's edge at the time of crossing. As a conservative measure, waterbody width was measured in the field at bank full height in the center of the survey corridor. This is the widest width of the waterbody at normal stage, not flood stage. Therefore, during construction, the width of the water at the time of the crossing will either be equal to or less than this value of bank full width. This bank full width was used to determine the FERC classification as minor (less than or equal to 10 feet wide at the water's edge), intermediate (>10-100 feet) or major (> 100 feet). The "length of crossing" is the pipeline centerline crossing any portion of the waterbody, either perpendicular to or parallel to a portion of the waterbody. The length of the pipeline crossing differs from the waterbody width since it was not possible to design the pipeline route to cross all waterbodies exactly perpendicular.

Section 2.2.1.3 text should be revised as follows:

MVP proposes to cross intermediate waterbodies (greater than 10 feet wide but less than or equal to 100 feet wide at water's edge) and minor waterbodies (less than or equal to 10 feet wide at water's edge) by the open-cut method where a dry-ditch method is not specifically required by the FERC Procedures. Crossings of minor perennial and intermittent streams will be accomplished in accordance with FERC's Procedures and variances requested by MVP, if approved. MVP will also develop and implement its own Project-specific Erosion and Sediment Control Plan (E&SCP) that will outline BMPs to minimize impacts on various resources, including waterbodies. Major waterbodies (over 100 feet wide at water's edge) will be assessed on a case by case basis to determine the best crossing method and site specific construction and restoration plans. The Project will cross four major waterbodies (waterbody widths greater than 100 feet): Little Kanawha River (MP 75.0), Elk River (MP 87.4), Gauley River (MP 118.6), and Greenbrier River (MP 170.6). Site-specific construction mitigation and restoration plans for the major waterbody crossings are included in Appendix 1-C of Resource Report 1.

Mountain Valley will submit revisions to Tables 2.2-4, 2.2-5, and 2.2-6 with its wetland and waterbody encroachment permit applications. Mountain Valley expects to submit these applications by February 26, 2016.

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Supplemental Response submitted February 26, 2016:

Updated Tables 2.2-4 and 2.2-5 are provided as Attachments RR2-18a and RR2-18b, respectively. The Pigg River is 100 feet wide and therefore considered an intermediate waterbody (>10-100 feet). Mountain Valley provided a crossing plan for the Pigg River as a conservative measure due to its crossing width being on the line of classifying it as intermediate or major and the sensitivity of the crossing.

There were no updates needed for Table 2.2-6 and therefore a revised table has not been provided.

Respondent: Megan Neylon
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19. Section 2.2.2 of RR 2 stated that: “Mountain Valley Pipeline will prepare site-specific crossing plans for the three waterbodies that are greater than 100 feet.” However, table 2-A-2 lists five waterbodies greater than 100 feet which would be crossed by the pipeline route. Resolve the apparent discrepancies.

Response submitted January 15, 2016:

Mountain Valley will prepare crossing plans for all waterbodies with crossing greater than 100 feet. Mountain Valley expects to submit an updated Table 2-A-2 by February 26, 2016.

Supplemental Response submitted February 26, 2016:

A revised Table 2-A-2 is included as Attachment RR2-17. The table has been revised to include waterbody widths and FERC classification. The table now includes four major waterbodies (which would have pipeline crossing lengths greater than 100 feet) and one intermediate waterbody with a pipeline crossing length of 100 feet. Mountain Valley previously filed crossing plans for major waterbody crossings on December 7, 2015. Mountain Valley provided a crossing plan for the Pigg River (100 feet) as a conservative measure due to its crossing width being on the line of classifying it as intermediate or major and the sensitivity of the crossing.

Respondent: Megan Neylon
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Phone Number: 724-873-3645

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21. Mountain Valley is currently proposing open-cut wet ditch crossings for five waterbodies. Two of these waterbodies are major waterbody crossings and two are intermediate. One waterbody is listed on the Nationwide Rivers Inventory, and three are listed on the Virginia Significant Rivers list. Evaluate the use of alternative crossing methods, such as dry ditch and/or trenchless technologies, instead of wet open-cut crossings of those five waterbodies.

Response submitted January 15, 2016:

Mountain Valley Pipeline contracted RK&K, an engineering firm that specializes in underground crossing design. RK&K analyzed all five of the rivers mentioned for the feasibility of crossing with three pipe installation methods. The methods evaluated were conventional bore, horizontal directional drill (HDD) and open cut. Site geology, pipeline alignment, topography, access to both sides of the river, and ATWS availability for equipment support was analyzed at each river crossing. Any limiting factors that would affect the installation methods were also taken into account. From the available data, the installation methods were determined to be feasible or not. The feasible installation methods were ranked and the crossing method selected. Since the five rivers are major and intermediate water bodies, open cut dry ditch installation method was not considered. However, the rivers will be re-evaluated considering the open cut dry ditch installation method, and the crossing method updated based upon further analysis. The crossing method re-evaluation will be completed on available tracts. Mountain Valley expects to submit any changes to FERC by February 26, 2016.

Supplemental Response submitted February 26, 2016:

RK&K's Waterbody Crossing Review, which is included as Attachment RR2-21, analyzes six waterbody crossings using multiple construction methodologies. Using RK&K's feasible crossing methods and information from the environmental and cultural resources surveys, Mountain Valley has determined the most appropriate crossing method for each waterbody. This analysis is included in the attached report.

Respondent: Ricky Myers
Position: Engineering Manager
Phone Number: 724-873-3640

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23. Section 2.2.1.4 provides a summary of horizontal directional drill (HDD) feasibility for several waterbody crossings. Expand this discussion to include the feasibility of:
1. using an HDD at all major waterbodies, including the Left Fork Holly River and the Gauley River;

Response submitted January 15, 2016:

Mountain Valley Pipeline will assess the feasibility of crossing the Left Fork Holly River and Gauley River using the horizontal directional drill (HDD) method. Mountain Valley expects to submit an analysis by February 26, 2016.

Supplemental Response submitted February 26, 2016:

See the Waterbody Crossing Review included as Attachment RR2-21.

- m. completing the HDD in sections rather than one continuous pullback or push operation; and

Response submitted January 15, 2016:

Mountain Valley Pipeline will provide an HDD feasibility analysis for all major waterbodies. Mountain Valley expects to submit an analysis by February 26, 2016.

Supplemental Response submitted February 26, 2016:

See the Waterbody Crossing Review included as Attachment RR2-21.

- n. minor route alignment modifications for a more favorable HDD crossing.

Response submitted January 15, 2016:

Mountain Valley Pipeline will provide an HDD feasibility analysis for all major waterbodies. Mountain Valley expects to submit an analysis by February 26, 2016.

Supplemental Response submitted February 26, 2016:

See the Waterbody Crossing Review included as Attachment RR2-21.

Respondent: Ricky Myers
Position: Engineering Manager
Phone Number: 724-873-3640

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27. Revise the crossing methods in table 2.2-9 to match those provided in table 2-A-2.

Response submitted January 15, 2016:

Mountain Valley expects to update the revised crossing table and provide it to FERC with the stream crossing reevaluation report by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Table 2.2-9 (Attachment RR2-27) has been revised to match revised Table 2-A-2 (Attachment RR2-17).

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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Appendix 2.A – Waterbody Crossing Tables

36. As previously requested in our comments dated August 11, 2015, revise table 2-A-2 to:
- a. clarify why RR 1 stated that some waterbodies adjacent to roads or railroads would be crossed via conventional bore; however this crossing method is not listed in table 2-A-2;
 - b. define “ancillary sites temporary;”
 - c. clarify that “open cut dry ditch” refers to dam-and-pump or flume crossings and “open cut wet ditch” refers to an open-cut crossing as described in RR 1;
 - d. denote impaired waterbodies (table 2.2-9);
 - e. identify waterbodies impacted by the compressor stations;
 - f. clarify why the Greenbrier River was listed as a “minor” waterbody, but the crossing length would be 410 feet;
 - g. clarify why a waterbody would have a construction impact but no defined crossing length;
 - h. fill in all missing information including waterbody classification, fisheries, and timing restrictions; and
 - i. define the abbreviations and/or acronyms used to describe the fishery types.

Response submitted January 15, 2016:

Mountain Valley expects to submit a response by February 26, 2016.

Supplemental Response submitted February 26, 2016:

- a. The reference in Resource Report 1 is incorrect. No streams are anticipated to be crossed by a trenchless method.
- b. “Ancillary sites temporary” include the temporary areas for compressor stations, interconnects, pipe yards, laydown yards, and proposed rock disposal areas. The temporary impact acres includes the permanent impact acres.
- c. Open-cut dry ditch would divert water flow using either a dam and pump or flume method. Open-cut wet crossing methods would be constructed in the stream flow. These crossing methods are described in Section 2.2.1.4 of Resource Report 2.
- d. All waterbodies listed in revised Table 2.2-9 (Attachment RR2-27) are impaired.

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- e. Waterbodies impacted by “ancillary sites temporary” include compressor stations in Table 2-A-2.
- f. Table 2-A-2 (Attachment RR2-17) has been revised and this has been corrected. The Greenbrier River is a major crossing.
- g. The crossing length refers to the pipeline centerline. Minor impacts on waterbodies could also result from access roads or other temporary facilities which do not have a crossing length as they do not “cross” the waterbody.
- h. Table 2-A-2 has been revised and included as Attachment RR2-17. However, not all waterbodies have classifications or timing restrictions, therefore these cells are marked as “-.”
- i. Table 2-A-2 has been revised and included as Attachment RR2-17. Fishery type acronyms have been included in footnote e/.

Respondent: Megan Neylon
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37. Revise the analysis presented in section 2.3 and associated tables to only refer to a single wetland type (i.e., palustrine emergent [PEM], palustrine scrub/shrub [PSS], palustrine forested [PFO]). Avoid using combined PEM/PFO, PEM/PSS, PSS/PEM, PSS/PFO, PFO/PSS categories.

Supplemental Response submitted January 27, 2016:

Mountain Valley will submit revisions to Tables 2.3-1 and 2-B-1 with its wetland and waterbody encroachment permit applications. Mountain Valley expects to submit these applications by February 26, 2016.

Supplemental Response submitted February 26, 2016:

The wetland types depicted in Table 2-B-1 have been revised to refer to a single wetland classification. Revised Table 2-B-1 is included as Attachment RR2-37.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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38. Revise the analysis presented in section 2.3.1 to provide discussion of existing wetland resources and how they would be impacted, including:
- a. acreages of wetlands affected by both construction and operation – total acreage of impacted wetlands, by state, and total by wetland type (i.e., PEM, PSS, PFO);
 - b. acreage of PFO and PSS wetlands that would be maintained in both the 10-foot-wide corridor and 30-foot-wide corridor where woody vegetation would be selectively removed; and
 - c. construction and operation acreages of impacted wetlands by facility type (i.e., aboveground facilities, access roads, pipe storage and contractor yards, ATWS, and access roads). Clarify “ancillary sites” as referred to in table 2.3-1.

Supplemental Response submitted January 27, 2016:

Mountain Valley will submit revisions to Table 2.3-1 with its wetland and waterbody encroachment permit applications. Mountain Valley expects to submit these applications by February 26, 2016. See the response to Resource Report 1, Request 37.

Supplemental Response submitted February 26, 2016:

- a. Table 2-B-1 (Attachment RR2-37) has been revised and identifies impacts to wetlands by wetland type. Mountain Valley expects to submit revised Table 2.3-1 by March 1, 2016.
- b. Impacts on PFO and PSS wetlands are identified in Table 2-B-1 (Attachment RR2-37). The operational impacts provided in that table indicate what will be maintained and/or converted to PEM Cowardin Class. These impacts account for the maintenance permitted in the FERC Procedures (Section VI.D.1).
- c. Attachment RR2-37 identifies all temporary and permanent impacts on wetlands from the project as included in Mountain Valley’s Nationwide Permits to the respective U.S. Army Corps district offices. Construction and operational acreages by facility type will be included in revised Table 2.3-1. Mountain Valley expects to submit revised Table 2.3-1 by March 1, 2016.

Respondent: Megan Neylon
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39. Clarify the discrepancy between table 3.2-1 and table 2-B-1. Table 3.2-1 lists construction impacts on wetlands as 1.64 acres and operational impacts on wetlands as 0.56 acre; however, table 2-B-1 lists construction impacts on wetlands as 23.86 acres and operational impacts as 9.29 acres.

Supplemental Response submitted January 27, 2016:

Table 3.2-1 did not include temporary and permanent impacts within the right-of-way easement whereas Tables 2.3-1 and 2-B-1 did include these as impacts. Mountain Valley will submit revisions to Tables 2.3-1 and 2-B-1 with its wetland and waterbody encroachment permit applications. Mountain Valley expects to submit these applications by February 26, 2016. See the response to Resource Report 1, Request 37.

Supplemental Response submitted February 26, 2016:

Revised Table 2-B-1 (Attachment RR2-37) identifies all temporary and permanent impacts on wetlands from the project as included in Mountain Valley's Nationwide Permits to the respective U.S. Army Corps district offices. Mountain Valley expects to submit revised Table 2.3-1 by March 1, 2016.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
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42. Clarify the meaning of “Not Reported” wetland acreages in table 2.3-1.

Supplemental Response submitted January 27, 2016:

Mountain Valley will submit revisions to Table 2.3-1 with its wetland and waterbody encroachment permit applications. Mountain Valley expects to submit these applications by February 26, 2016. See the response to Resource Report 1, Request 37.

Supplemental Response submitted February 26, 2016:

The “not reported” wetland acreages was erroneously left in the table.

Respondent: Megan Neylon
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43. As previously requested in our comments dated August 11, 2015, provide a detailed discussion of actual or conceptual compensatory mitigation plans for wetland impacts for each state based on consultation with the COE and state agencies.

Response submitted January 15, 2016:

A compensatory mitigation plan is being prepared and will be submitted with the United States Army Corps of Engineers Nationwide 12 Preconstruction Notification Package and West Virginia DEP 401 Water Quality Certification. Mountain Valley expects to submit the plan by February 26, 2016. All unavoidable permanent or conversion wetland impacts will be mitigated through the purchase of wetland and stream credits from approved mitigation banks in West Virginia and Virginia. In West Virginia the in lieu of fee program may also be utilized as necessary. Calculation of compensatory mitigation credits for West Virginia will be determined using the West Virginia Stream and Wetland Valuation Metric (SWVM) Version 2.1, September 2015. For Virginia, calculation of compensatory mitigation credits will be determined using the Corps mitigation calculation worksheet.

Supplemental Response submitted February 26, 2016:

Mountain Valley included the compensatory wetland mitigation plan for each U.S. Army Corps district with the Nationwide Permit Applications that were submitted on February 25, 2016. The compensatory wetland mitigation plans are provided as Attachments General 1e-1 (Huntington District), 1e-2 (Pittsburgh District), and 1e-3 (Norfolk District).

Respondent: Megan Neylon
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44. Provide more details concerning measures that Mountain Valley would implement to avoid and/or minimize secondary and indirect impacts on adjacent wetland areas (i.e., prevention of sediment discharge into adjacent wetlands and waterbodies - erosion and sediment control measures, dewatering), or mitigation thereof if effects cannot be avoided or minimized.

Response submitted January 15, 2016:

Mountain Valley Pipeline will follow the FERC Procedures and the Project-specific Erosion and Sediment Control Plan, which Mountain Valley expects to submit by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Mountain Valley submitted the Erosion and Sediment Control Plans for West Virginia pipelines and compressor stations to the West Virginia Department of Environmental Protection on February 23, 2016. A copy is included as Attachment General 1a-1.

Mountain Valley submitted the General Erosion & Sediment Control Specification for Virginia to the Virginia Department of Environmental Quality on February 11, 2016. A copy is included as Attachment General 1a-2.

Mountain Valley will implement general stabilization and structural erosion and sediment control practices to convey runoff, prevent sediment from moving off the permitted right-of-way and reduce the erosive forces of runoff. To protect adjacent resources, Mountain Valley will clearly mark the limits of clearing and sensitive resources adjacent to the construction right-of-way with signage and/or orange construction fence. Controls will be placed along the boundary of sensitive areas, at stream and wetland crossings, downslope of all stockpiles, and where potential exists for off-site sediment transport. Best management practices to control sediment transport will include; rock construction entrances, diversion berms and sediment trap outlets, silt fence, compost filter sock, trench plugs, waterbars, filter bags, erosion control blankets, and vegetative stabilization. More detailed information on measures Mountain Valley will implement to avoid and/or minimize secondary and indirect impacts on adjacent wetland areas is contained in the Erosion and Sediment Control Plans for each state.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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Request:

Resource Report 2 – Water Use and Quality

Wetlands

45. Clarify discrepancies in wetland impact totals between table 2.3-1 (Construction – 24.07 acres, Operation – 9.42 acres, Total – 33.49) and appendix table 2-B-1 (Construction – 23.86 acres, Operation – 9.29 acres, Total – 33.15 acres).

Supplemental Response submitted January 27, 2016:

Mountain Valley will submit revisions to Tables 2.3-1 and 2-B-1 with its wetland and waterbody encroachment permit applications. Mountain Valley expects to submit these applications by February 26, 2016. See the response to Resource Report 1, Request 37.

Supplemental Response submitted February 26, 2016:

Revised Table 2-B-1 (Attachment RR2-37) identifies all temporary and permanent impacts on wetlands from the project as included in Mountain Valley's Nationwide Permits to the respective U.S. Army Corps district offices. Mountain Valley expects to submit revised Table 2.3-1 by March 1, 2016.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 3 – Fisheries, Vegetation and Wildlife

1. File all pending biological and botanical survey reports and related analyses, or provide a schedule for their submission, including, but not limited to:
 - a. portal surveys for bats;
 - b. surveys for raptor nests;
 - c. surveys for rare, threatened, and endangered species and their habitats;
 - d. biological evaluation for the Jefferson National Forest; and
 - e. applicant-prepared draft biological assessment developed in coordination with the FWS for the Roanoke logperch and northern long-eared bat (and other federally listed species as appropriate).

Supplemental Response submitted January 27, 2016:

a-e. The table below summarizes the reports and submission dates (or expected submission dates). All reports and surveys filed with this response (see the last column of the table) contain privileged information and are labeled “**Contains Privileged Information – Do Not Release.**”

Habitat Assessment/Survey Report	Date Submitted to Agencies (or expected)	Date Submitted to FERC (or expected)	Status
Bat Mist Net Studies in West Virginia	11/13/15	12/7/15	Previously Submitted
Detailed habitat assessments for Indiana and northern long-eared bats in West Virginia	1/8/16	1/27/16	Attachment RR3-1c-1
Hibernacula and Harp trap surveys in West Virginia	1/11/16	1/27/16	Attachment RR3-1a-1
Bat Mist Net Studies in Virginia	11/13/15	12/7/15	Previously Submitted
Detailed habitat assessments for Indiana and northern long-eared bats in Virginia	1/8/16	1/27/16	Attachment RR3-1c-2
Hibernacula and Harp trap surveys in Virginia	1/13/16	1/27/16	Attachment RR3-1a-2
Rare plants in West Virginia	11/13/15	12/7/15	Previously Submitted
Rare plants in Virginia	11/13/15	12/7/15	Previously Submitted
Bog turtles in Virginia	Summer 2016	Summer 2016	Summer 2016
Freshwater mussels (unionidae) in West Virginia	11/13/15	12/7/15	Previously Submitted
Freshwater mussels (unionidae) in Virginia	11/13/15	12/7/15	Previously Submitted

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Habitat Assessment/Survey Report	Date Submitted to Agencies (or expected)	Date Submitted to FERC (or expected)	Status
Habitat assessments for roanoke logperch in Virginia	11/13/15	12/7/15	Previously Submitted
Survey report for bald and golden eagle nests in West Virginia	1/6/16	1/27/16	Attachment RR3-1b
Loggerhead shrike in Virginia	11/13/15	12/7/15	Previously Submitted
USFS Biological Evaluation	1/22/16	1/27/16	Attachment RR3-1d
Applicant-prepared Draft Biological Assessment	2/26/16	2/26/16	Will be submitted under a separate report

Supplemental Response submitted February 26, 2016:

- e. The Applicant-prepared Draft Biological Assessment is currently being reviewed by the Virginia and West Virginia USFWS field offices. Mountain Valley is awaiting review from the USFWS offices and will file the final plan with FERC once it is approved. The Applicant-prepared Draft Biological Assessment is included as Attachment RR3-1e. The attachment includes privileged information and is labeled **“Contains Privileged Information – Do Not Release.”**

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

**Mountain Valley Pipeline, LLC
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**Responses to Environmental Information Request
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Request:

Resource Report 3 – Fisheries, Vegetation and Wildlife

Endangered, Threatened, and Special Concern Species

19. Discuss the impacts of forest clearing in temporary work areas outside the permanent right-of-way upon “tree bats” such as the Indiana bat and northern long-eared bat.

Response submitted January 15, 2016:

Impacts to listed bat species associated with forest clearing activities will be addressed in the Biological Assessment. Mountain Valley expects to submit the Biological Assessment by February 26, 2016.

Supplemental Response submitted February 26, 2016:

The impacts of forest clearing in temporary work areas outside the permanent right-of-way upon “tree bats” are discussed in the Applicant-prepared Draft Biological Assessment, which is included as Attachment RR3-1e. The attachment includes privileged information and is labeled “**Contains Privileged Information – Do Not Release.**”

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 4 – Cultural Resources

20. Provide a schedule for filing cultural resources survey reports, and the SHPOs’ comments on those reports that cover the following counties: Nicholas, Greenbrier, Fayette, Summers, and Monroe in West Virginia; and Craig, Montgomery, Roanoke, and Floyd in Virginia. Also, provide a report documenting an architectural survey of Giles County, Virginia, and file the SHPO’s comments on that report.

Response submitted January 15, 2016:

Resource Report 4 Response 20 – Table 20				
Schedule for Filing Resource Survey Reports and SHPO Comments				
State	Counties	Report	Submission Date	Anticipated Comment Date FERC Filing Date
VA	Craig, Montgomery, Roanoke, Floyd	Phase IB Archaeology	2/1/2016	3/1/2016
VA	Giles	Architectural	2/1/2016	3/1/2016
WV	Nicholas, Greenbrier, Fayette	VOL III Combined Archaeological and Architectural	12/23/2015	1/23/2016
WV	Summers and Monroe	VOL IV Combined Archaeological and Architectural	2/1/2016	3/1/2016

*Floyd County is within the indirect APE.

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Supplemental Response submitted February 26, 2016:

The revised schedule for filing cultural resources survey reports is provided below:

Resource Report 4 Response 20 – Table 20				
Schedule for Filing Resource Survey Reports and SHPO Comments				
State	Counties	Report	Submission Date	Anticipated Comment Date
WV	Wetzel, Harrison, Doddridge, Lewis, Braxton, Webster, Nicholas, Greenbrier, Fayette	Response to Comments on Architectural and Historic Resources Cultural Resources Survey Report, Volumes I-III	2/24/2016	3/25/2016
VA	Craig, Montgomery, Roanoke	Phase IB Archaeology	3/4/2016	4/4/2016
VA	Giles and Craig	Architectural	3/4/2016	4/4/2016
VA	Roanoke	Architectural	3/4/2016	4/4/2016
WV	Summers and Monroe	VOL IV Combined Archaeological and Architectural	2/23/2016	3/24/2016

The reports filed with this response are included as Attachment RR4-20a (Response to Comments on Architectural and Historic Resources Cultural Resources Survey Report, Volumes I-III) and Attachment RR4-20b (West Virginia Volume IV). Attachment RR4-20b includes privileged information and is labeled “**Contains Privileged Information – Do Not Release.**”

No earth disturbance is anticipated in Floyd County, therefore Floyd County is not addressed in the Roanoke County archaeology report.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

**Mountain Valley Pipeline, LLC
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Federal Energy Regulatory Commission

Request:

Resource Report 5 – Socioeconomics

1. Provide a table of major tourist attractions in the project area by county/state. Indicate the distance between the pipeline and those tourist attractions.

Response:

A list of major tourist attractions in the Project area is provided in the following table. Several attractions are located in multiple counties; the distance in the table is the closest distance to the Project. Additional information on potential impacts and mitigation measures associated with these attractions is provided in Resource Reports 5 and 8.

Major Tourist Attractions in the Project Area		
Attraction	County <u>a/</u>	Approximate Distance from the Project
West Virginia		
North Bend Rail Trail	Harrison County	Crossed by the pipeline
Lantz Farm and Nature Preserve	Wetzel County	5.0 miles
Lewis Wetzel WMA	Wetzel County	6.0 miles
Smoke Camp WMA	Lewis County	0.6 mile
Stonewall Jackson Lake WMA	Lewis County	2.1 miles
Stonewall Resort (at Stonewall Jackson Lake State Park)	Lewis County	4.3 miles
Staunton-Parkersburg Turnpike (Scenic Byway)	Lewis County	Crossed by the pipeline
Burnsville Lake WMA	Braxton County	TBD
Weston Gauley Bridge Turnpike	Braxton County	Crossed by the pipeline
Elk River WMA	Braxton County	0.3 mile
Big Ditch WMA	Webster County	0.4 mile
Meadow River WMA	Greenbrier County	Adjacent to laydown yard
Cranberry WMA	Nicholas, Webster, and Greenbrier Counties	1.9 miles
Holly River State Park	Webster County	5.0 miles
Summersville Lake	Nicholas County	1.1 miles
Cranberry Tri-Rivers Rail-Trail	Nicholas County	2.0 miles
Gauley River	Nicholas County	Crossed by the pipeline
Jefferson National Forest	Monroe County	Crossed by the pipeline
Appalachian Trail	Monroe County	Crossed by the pipeline
Virginia		
Appalachian Trail	Giles County	Crossed by the pipeline
Jefferson National Forest	Giles County	Crossed by the pipeline

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Major Tourist Attractions in the Project Area		
Attraction	County <u>a/</u>	Approximate Distance from the Project
Peters Mountain Wilderness	Giles County	75 feet
Cascade Falls	Giles County	2.6 miles
Mountain Lake Park and Resort	Giles County	2.4 miles
Whitt-Riverbend Park	Giles County	1.9 miles
Greater Newport Rural Historic District	Giles County	Crossed by the pipeline
Roanoke River	Montgomery County	Crossed by the pipeline
Elliston Park	Montgomery County	0.6 mile
Shenandoah Bike Trail and Park	Montgomery County	2.4 miles
Bottom Creek Gorge	Montgomery County	2.2 miles
Cahas Mountain	Roanoke County	1.5 miles
Cahas Overlook	Roanoke County	4.7 miles
Camp Roanoke	Roanoke County	1.4 miles
Poor Mountain Overlook	Roanoke County	1.5 miles
Blue Ridge Parkway	Roanoke and Franklin Counties	Crossed by the pipeline
Slings Gap Overlook	Franklin County	2.6 miles
Pigg River (State Scenic River)	Franklin County	Crossed by the pipeline
White Oak Mountain WMA	Pittsylvania County	1.7 miles
<u>a/</u> Several attractions are located in multiple counties and/or states. Only the counties within the Project area are listed in this table.		

Supplemental Response submitted February 26, 2016:

A revised list of major tourist attractions in the Project area with a revised distance for the Burnsville WMA is provided in the following table.

Major Tourist Attractions in the Project Area (Revised February 26, 2016)		
Attraction	County <u>a/</u>	Approximate Distance from the Project
West Virginia		
North Bend Rail Trail	Harrison County	Crossed by the pipeline
Lantz Farm and Nature Preserve	Wetzel County	5.0 miles
Lewis Wetzel WMA	Wetzel County	6.0 miles
Smoke Camp WMA	Lewis County	0.6 mile
Stonewall Jackson Lake WMA	Lewis County	2.1 miles
Stonewall Resort (at Stonewall Jackson Lake State Park)	Lewis County	4.3 miles
Staunton-Parkersburg Turnpike (Scenic Byway)	Lewis County	Crossed by the pipeline
Burnsville Lake WMA	Braxton County	Adjacent
Weston Gauley Bridge Turnpike	Braxton County	Crossed by the pipeline
Elk River WMA	Braxton County	0.3 mile

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Major Tourist Attractions in the Project Area (Revised February 26, 2016)		
Attraction	County <u>a/</u>	Approximate Distance from the Project
Big Ditch WMA	Webster County	0.4 mile
Meadow River WMA	Greenbrier County	Adjacent to laydown yard
Cranberry WMA	Nicholas, Webster, and Greenbrier Counties	1.9 miles
Holly River State Park	Webster County	5.0 miles
Summersville Lake	Nicholas County	1.1 miles
Cranberry Tri-Rivers Rail-Trail	Nicholas County	2.0 miles
Gauley River	Nicholas County	Crossed by the pipeline
Jefferson National Forest	Monroe County	Crossed by the pipeline
Appalachian Trail	Monroe County	Crossed by the pipeline
Virginia		
Appalachian Trail	Giles County	Crossed by the pipeline
Jefferson National Forest	Giles County	Crossed by the pipeline
Peters Mountain Wilderness	Giles County	75 feet
Cascade Falls	Giles County	2.6 miles
Mountain Lake Park and Resort	Giles County	2.4 miles
Whitt-Riverbend Park	Giles County	1.9 miles
Greater Newport Rural Historic District	Giles County	Crossed by the pipeline
Roanoke River	Montgomery County	Crossed by the pipeline
Elliston Park	Montgomery County	0.6 mile
Shenandoah Bike Trail and Park	Montgomery County	2.4 miles
Bottom Creek Gorge	Montgomery County	2.2 miles
Cahas Mountain	Roanoke County	1.5 miles
Cahas Overlook	Roanoke County	4.7 miles
Camp Roanoke	Roanoke County	1.4 miles
Poor Mountain Overlook	Roanoke County	1.5 miles
Blue Ridge Parkway	Roanoke and Franklin Counties	Crossed by the pipeline
Slings Gap Overlook	Franklin County	2.6 miles
Pigg River (State Scenic River)	Franklin County	Crossed by the pipeline
White Oak Mountain WMA	Pittsylvania County	1.7 miles
<u>a/</u> Several attractions are located in multiple counties and/or states. Only the counties within the Project area are listed in this table.		

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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Request:

Resource Report 5 – Socioeconomics

11. Revise the “Traffic and Transportation Management Plan” attached as appendix 5-B to provide:
 - a. list of all roads to be used for access, organized by federal, state, county, private;
 - b. counts of current traffic on the federal, state, and county roads that would be used for access, during the time period 6:00am to 7:00pm, with peak traffic hours recognized;
 - c. estimates of project-related construction traffic on each of the access roads, by construction spread, with peak periods recognized;
 - d. indicate how Mountain Valley would document the pre-construction condition of all access roads;
 - e. verify that Mountain Valley would repair all roads damaged by construction of the project;
 - f. list of equipment types and number of vehicles to be used for construction of the project by spread;
 - g. number of buses to be used by spread to transport workers from yards (identified) to the pipeline right-of-way;
 - h. number of water trucks and volume of water per truck for each construction spread;
 - i. type of tackifiers that may be used;
 - j. any road improvements that may be necessary to accommodate construction traffic;
 - k. measures that would be implemented at rural neighborhoods to ensure landowners would have maintained access to their houses; and
 - l. documentation that the revised Traffic Plan was provided to all state and local highway departments, and file their comments on the plan.

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Response submitted January 15, 2016:

Mountain Valley expects to submit a response by February 26, 2016.

Supplemental Response submitted February 26, 2016:

- a. See Attachment RR5-11a.
- b. See Attachment RR5-11a.
- c. See Attachment RR5-11c.
- d. Access road pre-construction conditions will be documented via high definition photography.
- e. Mountain Valley will complete pre-construction and post-construction video documentation showing the condition of each road that Mountain Valley expects to utilize. Upon construction completion, a comparative analysis will be performed using video data to determine road damage, if any. In coordination with state transportation offices, any damage deemed as a result of Mountain Valley construction will be repaired by Mountain Valley.
- f. A list of equipment types and estimated construction traffic, per spread, is included as Attachment RR5-11f.
- g. See Attachment RR5-11f, row "School Buses."
- h. See Attachment RR5-11f, row "Water Trucks."
- i. Tackifiers may be necessary to control fugitive dust as discussed in the Fugitive Dust Control Plan (filed January 15, 2016). Typical tackifiers that are used for dust control are DustFloc, RoadFloc and Kodiak Super TACKMixes.
- j. Mountain Valley has employed former West Virginia Department of Highways Engineers to review all roads used by Mountain Valley. These engineers have identified a number of roads that need improvement prior to construction. A complete list is being finalized. Mountain Valley plans to submit this data by March 15, 2016.
- k. Access will not be restricted to any residence. Mountain Valley will work with all affected landowners to ensure adequate access is maintained to their property as specified in landowner agreements.
- l. Traffic Management Plans are site-specific and cannot be established until the roadway scope of work is complete. Mountain Valley expects that a majority of the traffic plans will be "typical" based on state regulations by road type and posted speed

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limits. Mountain Valley will be able to provide a "typical" plan per state code. Mountain Valley expects to submit these plans to all state and local highway departments by June 2016. Comments on the plans will be filed with FERC as they are received.

Respondent: John Uhrin
Position: Construction Director
Phone Number: 724-873-3497

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Request:

Resource Report 6 – Geologic Resources

19. Section 6.4.2.3 stated that: “construction across or in the near vicinity of Canoe Cave and a nearby spring at MP 213.7 may lead to impacts to that natural resource, long-term differential settlement, and pipeline instability.” Discuss if Canoe Cave and the nearby spring can be avoided. If not, identify the measures Mountain Valley would implement to protect those natural resources, and protect the pipeline from settlement or instability. Also, document recent communications with Virginia state agencies regarding the pipeline route and construction near Canoe Cave.

Response submitted January 15, 2016:

Mountain Valley Pipeline will review the Project alignment in the vicinity of Canoe Cave for potential adjustments to avoid the cave and its local hydrologic system. Mountain Valley Pipeline will identify options for alignment adjustments in this area and expects to provide this information to FERC by February 26, 2016.

Mountain Valley Pipeline representatives contacted Mr. Wil Orndorff, Virginia Department of Conservation and Recreation – Karst Protection coordinator, regarding Canoe Cave on September 18, 2015. At that time, field-verified location data for the cave was not available. Subsequently, Mountain Valley Pipeline provided Mr. Orndorff on October 29, 2015 with data on the field-verified location of Canoe Cave and associated spring, as well as locations of all karst features confirmed in the field as of that date, and locations of karst features identified during desktop review but not yet field-verified.

Supplemental Response submitted February 26, 2016:

Due to extreme weather in the month of February, Mountain Valley has not been able to complete a karst assessment on all necessary tracts around Canoe Cave. In addition, Mountain Valley continues its efforts to gain permission from property owners to access properties along the proposed alignment in karst terrain in order to finalize the karst hazards survey. Additional surveys are scheduled for March. Mountain Valley expects to submit a final routing assessment around the Canoe Cave area to FERC by April 22, 2016.

Respondent: John Uhrin
Position: Construction Director
Phone Number: 724-873-3497

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Request:

Resource Report 6 – Geologic Resources

22. Section 6.4.3 stated that mitigation measures for potential slope stability areas would be included in the “final pipeline design.” File an outline of the mitigation measures for unstable slopes, or provide a schedule for the completion of the “final pipeline design.”

Response submitted January 15, 2016:

Mountain Valley Pipeline has completed the field reviews of the 26 areas identified to exhibit slope stability issues. The results and recommendations from said reviews, including mitigation measures, are being compiled. Mountain Valley expects to submit it to FERC by February 26, 2016.

Supplemental Response submitted February 26, 2016:

A Landslide Mitigation Plan is included as Attachment General 1k.

Respondent: Ricky Myers
Position: Engineering Manager
Phone Number: 724-873-3640

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Request:

Resource Report 6 – Geologic Resources

26. Section 6.6.1.5 states that Mountain Valley’s contractor would prepare a karst-specific ESCP. Provide a copy of that plan, or a schedule for when it would be filed with the FERC. Document that the plan was submitted to appropriate state resource agencies and file their comments with the FERC. The karst-specific ESCP should include measures that would be used to stabilize sinkholes, and address state agency recommendations.

Response submitted January 15, 2016:

Karst specific erosion and sedimentation control plans will be submitted to FERC as part of the overall Project erosion and sedimentation control plan. Mountain Valley expects to submit to FERC the final erosion and sedimentation control plans by February 26, 2016.

Supplemental Response submitted February 26, 2016:

A karst-specific erosion and sedimentation control plan for West Virginia is included in the project-specific Erosion and Sediment Control Plan for pipelines provided as Attachment General 1a-1.

A karst-specific erosion and sedimentation control plan for Virginia is included as Attachment General 1b.

Mountain Valley will file any comments received from the agencies.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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Request:

Resource Report 6 – Geologic Resources

28. Provide a schedule for the completion of the geotechnical landslide evaluation, and the filing of a report of the evaluation with the FERC and appropriate state resource agencies.

Response submitted January 15, 2016:

Mountain Valley Pipeline has completed the field reviews of the 26 areas listed in Table 6.4-6. The results and recommendations from said reviews, including mitigation measures, are being compiled. Mountain Valley expects to submit it by February 26, 2016.

Supplemental Response submitted February 26, 2016:

A Landslide Mitigation Plan is included as Attachment General 1k. The Landslide Mitigation Plan was submitted with the West Virginia Erosion and Sediment Control Plan on February 23, 2016. The Landslide Mitigation Plan will be submitted to the Virginia Department of Environmental Quality with the final General Erosion & Sediment Control Specification in May 2016.

Respondent: Ricky Myers
Position: Engineering Manager
Phone Number: 724-873-3640

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 7 – Soils

1. As previously requested in our comments dated August 11, 2015, provide a discussion of contaminated areas that maybe be located within 0.25 mile of the proposed pipeline route. Provide the following:
 - a. sources searched to identify potentially and known contaminated areas; and
 - b. provide a timeframe for when the Unanticipated Discovery of Contamination Plan will be made available.

Supplemental Response submitted January 27, 2016:

- a. The response to part a. of this request was provide with the January 15, 2016 submittal to FERC.
- b. An Unanticipated Discovery of Contamination Plan will be included as an Appendix to the Final SPCC plan. This plan is currently in development. Mountain Valley expects to submit it to FERC by February 26, 2016.

Supplemental Response submitted February 26, 2016:

- b. The Unanticipated Discovery of Contamination Plan is included as Attachment General 1i.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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Request:

Resource Report 8 – Land Use, Recreation and Aesthetics

10. Table 8.1-5 listed 10 railroad crossing sites, while table 8-A (appendix 8-A) listed 11 railroad crossings. Clarify the apparent discrepancy and provide updated tables as necessary.

Supplemental Response submitted January 27, 2016:

A revised Table 8.1-5 is included as Attachment RR8-10.

Supplemental Response submitted February 26, 2016:

Mountain Valley inadvertently omitted a railroad crossing at milepost 143.8 in the Supplemental Response submitted January 27, 2016. A revised Table 8.1-5 that contains this crossing is included as Attachment RR8-10a.

Respondent: John Uhrin
Position: Construction Director
Phone Number: 724-873-3497

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 8 – Land Use, Recreation and Aesthetics

18. Document that Mountain Valley provided the WVDNR with plans for the crossing of the Burnsville Lake Wildlife Management Area (WMA), the Elk River WMA, and the Meadow River WMA, and file the WVDNR's comments on those plans.

Response submitted January 15:

On December 12, 2015 Mountain Valley Pipeline met with Cliff Brown, a representative of the West Virginia Division of Natural Resources to discuss areas such as the Burnsville Lake Wildlife Management Area (WMA), the Elk River WMA, and the Meadow River WMA. During that meeting, Mr. Brown was given a sheet from the proposed alignment sheets showing the pipeline route in the vicinity of Burnsville WMA. During the meeting, there was discussion about moving the pipeline slightly to the west to only cross Knawl Creek rather than crossing both Knawl Creek and Left Fork Knawl Creek in such close proximity. The area of this crossing is unavoidable due to steep topography to the west of the proposed crossing and numerous homes to the east. The proposed crossing provides an open field at the bottom which allows the pipeline to cross the stream at a near perpendicular angle with adequate workspace to construct the area responsibly and safely. As erosion and sedimentation plans are developed for this area, consultation will continue with the West Virginia Division of Natural Resources.

During the meeting, Mountain Valley Pipeline's route in the area of the Elk River and Meadow River WMAs were also discussed. Mountain Valley Pipeline is routed approximately 0.25 mile from the Elk River WMA and does not cross WMA property. Similarly, a temporary pipeyard is on private property within the vicinity of the Meadow River WMA, no disturbance is proposed to the WMA property.

Supplemental Response submitted February 26, 2016:

During a field review meeting with the West Virginia Division of Natural Resources on February 16, 2016, it was determined that Mountain Valley Pipeline does not actually cross the Burnsville Lake WMA.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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Request:

Resource Report 8 – Land Use, Recreation and Aesthetics

Appendix 8-B – Site Specific Residential Construction and Mitigation Plans

25. Document that the site-specific Residential Construction Plans in appendix 8-B were submitted to the individual landowners, and file the landowners' comments on the plans. In providing copies of letters sent to landowners to the FERC, Mountain Valley should redact individual addresses, but include the tract number.

Response submitted January 15, 2016:

Mountain Valley expects to submit a response by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Mountain Valley expects to submit a response by March 1, 2016.

Respondent: Kevin Wagner
Position: Land Director
Phone Number: 304-627-6431

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 8 – Land Use, Recreation and Aesthetics

Appendix 8-C – Structures within 50 Feet of the Proposed Pipeline

28. Update table 8-C to include all residential construction plan drawing numbers.

Response submitted January 15, 2016:

Mountain Valley expects to submit a response by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Mountain Valley expects to submit a response by March 1, 2016.

Respondent: Kevin Wagner
Position: Land Director
Phone Number: 304-627-6431

**Mountain Valley Pipeline, LLC
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Request:

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Appendix 8-C – Structures within 50 Feet of the Proposed Pipeline

29. Fill in “TBD” in table 8-C to list future mitigation measures.

Response submitted January 15, 2016:

Mountain Valley expects to submit a response by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Mountain Valley expects to submit a response by March 1, 2016.

Respondent: Kevin Wagner
Position: Land Director
Phone Number: 304-627-6431

**Mountain Valley Pipeline, LLC
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Request:

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Appendix 8-F – Visual Simulations

30. Provide a visual simulation of the communication towers from nearby roads, points of interest, and residences.

Supplemental Response submitted January 27, 2016:

Additional field work is required to provide the requested simulations. Mountain Valley anticipates providing the requested simulations by February 26, 2015.

Supplemental Response submitted February 26, 2016:

Visual simulations for communication towers from nearby roads, points of interest, and residences are provided as Attachment RR8-30.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 8 – Land Use, Recreation and Aesthetics

Appendix 8-F – Visual Simulations

31. Provide visual simulations for all key observation points that have a high potential for visual impacts as discussed in section 8.4.3, such as the pipeline crossings at:
- a. North Bend Rail Trail;
 - b. Tully Ridge adjacent to I-79;
 - c. Weston Gauley Turnpike;
 - d. Red Spring Mountain adjacent to I-64;
 - e. Greenbrier River;
 - f. Farm Heritage Road;
 - g. Mountain Shadow Trail;
 - h. Roanoke River;
 - i. Blackwater River B; and
 - j. Pigg River.

Supplemental Response submitted January 27, 2016:

Additional field work is required to provide the requested simulations. Mountain Valley anticipates providing the requested simulations by February 26, 2015.

Supplemental Response submitted February 26, 2016:

The requested visual simulations are provided as Attachment RR8-31. The visual simulations were prepared from the observation points discussed in Section 8.4.3 of Resource Report 8 for the respective locations. Note that the simulations are from publicly-accessible locations, not from privately-owned property that could provide a more direct view of the resource and the crossing.

Note that for the Weston Gauley Turnpike crossing, the discussion in Section 8.4.3 of Resource Report 8 assumed an open cut crossing of this roadway, but Mountain Valley has since determined that this roadway will be crossed by horizontal bore, which is reflected in the visual simulation. This would result in reducing the expected level of visual impact from high to moderate.

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Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 9 – Air Quality and Noise

Noise

7. Estimate potential sound levels from construction and operation of aboveground facilities. Provide projected noise impacts at noise sensitive areas (NSA) in proximity to the aboveground facilities, in tables similar to edited table 9.2-8.

Response submitted January 15, 2016:

Compressor Sites:

Operational and construction noise for the compressor stations is provided in Resource Report 9 with additional data provided in the responses to Resource Report 9, Requests 6 and 8.

Valve Sites:

Construction of the valve sites will generate short term noise from heavy machinery and equipment as construction moves in phases along the right-of-way, similar to the pipeline itself. The noise from constructing the valve site will be indistinguishable from the construction noise associated with the pipeline. Sound from valve site construction will generally be temporary, sporadic, and short-term at each location along the pipeline route. Because of the temporary and generally daytime-only nature of valve site construction activities, no special noise mitigation or noise monitoring program will be implemented during the construction phase.

An operational noise evaluation is not necessary for the valve sites because normal operational noise from the valves will be negligible as the pipeline and main line valve itself will be buried.

Measurement/Interconnect Sites:

Mountain Valley is working to determine the operational and construction noise impact associated with each of the interconnect facilities through a noise study. The study will include the following facilities:

Mobley Interconnect Receipt
Sherwood Interconnect Receipt
WB Interconnect Delivery
Transco Interconnect Delivery

Mountain Valley expects to file this information by February 26, 2016.

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Supplemental Response submitted February 26, 2016:

The noise study regarding the operational and construction noise impact associated with each of the interconnect facilities is included as Attachment RR9-7.

Respondent: Ricky Myers
Position: Engineering Manager
Phone Number: 724-873-3640

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Request:

Resource Report 10 – Alternatives

15. As previously requested in our comments dated August 11, 2015, supplement appendix tables 10-D-1 and 10-D-2 (which are subsequent iterations of former table 10.6-19) to also include data columns for individual tract/parcel numbers (which can be directly connected to names in the landowner list in appendix 1-M and also to tract/parcel numbers in the alignment sheets) as well as a conclusion statement (where applicable) regarding whether all stakeholder's routing or specific resource avoidance concern (e.g., proximity to a home, well, spring, wetland, future residential development, etc.) have been resolved (resolution including not just route or work space adjustments, but also potentially changes in construction method or other mutually agreeable mitigation). The analysis should be based on direct stakeholder discussions and on-site evaluations, if the landowner is willing, and on available desktop imagery and data if landowner contact or access is denied. Update the amended appendix tables 10-D-1 and 10-D-2 to reflect any landowner accommodations completed since the filing of the application and also include two additional, comparable tables with one detailing any requested route modifications/mitigation that were rejected by Mountain Valley and the other describing any such requests that are pending while under review by the company.

Response submitted January 15, 2016:

Mountain Valley expects to submit a response by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Attachment RR10-15 includes landowner requests for reroutes that have been made on the Mountain Valley FERC docket. Mountain Valley has examined each request and provided a response.

Respondent: Kevin Wagner
Position: Land Director
Phone Number: 304-627-6431

**Mountain Valley Pipeline, LLC
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Request:

Resource Report 11 – Reliability and Safety

19. Section 11.1.7 indicated that: “Mountain Valley Pipeline is in the process of reviewing identified areas of potential slope stability issues.” Provide the results of the analyses or a timeframe for their submittal.

Response submitted January 15, 2016:

Mountain Valley expects to submit a response by February 26, 2016.

Supplemental Response submitted February 26, 2016:

A Landslide Mitigation Plan is included as Attachment General 1k.

Respondent: Ricky Myers
Position: Engineering Manager
Phone Number: 724-873-3640

**Mountain Valley Pipeline, LLC
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Request:

Supplemental Filing – December 7, 2015

Waterbody Crossing Drawings

1. On December 7, 2015, Mountain Valley filed site-specific waterbody crossing profile drawings for the Elk River, Gauley River, Greenbrier River, Little Kanawha River, and Pigg River. Table 2-A-2 lists the crossing length for the Pigg River as 83 feet. Clarify why a site-specific drawing was provided for this crossing. Also, according to table 2-A-2 the Left Fork Holly River has a crossing length of 151 feet. Provide a site-specific crossing plan for this waterbody.

Supplemental Response submitted January 27, 2016:

The Pigg River was erroneously classified as a major waterbody and has been re-classified as an intermediate waterbody and no longer requires a site-specific drawing. Left Fork Holly River was also erroneously labeled as having a crossing length of 151 feet. The correct Left Fork Holly River bank width is about 60 feet and is therefore considered an intermediate waterbody; therefore, a site-specific crossing plan for Left Fork Holly River was not developed.

Mountain Valley expects to provide a revised Table 2-A-2 by February 26, 2016. The above information will be reflected in the revised table.

Supplemental Response submitted February 26, 2016:

An updated Table 2-A-2 is included as Attachment RR2-17. The Pigg River is 100 feet wide and therefore considered an intermediate waterbody (>10-100 feet). Mountain Valley provided a crossing plan for the Pigg River as a conservative measure due to its crossing width being on the line of classifying it as intermediate or major and the sensitivity of the crossing.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

**Mountain Valley Pipeline, LLC
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U.S. Environmental Protection Agency Comments on the Application

Request:

Resource Report 6 – Geological Resources

Page 6-40 Long term stability should be considered in all situations and slope monitoring should not be a long-term solution in known failure areas. If long-term stability is not considered or not a long term possibility, the route should be changed. Additionally, a map or diagram should be provided of the known failure areas.

Response submitted January 15, 2016:

Mountain Valley Pipeline has completed the field reviews of the 26 areas listed in Table 6.4-6. The results and recommendations from said reviews, including mitigation measures, are being compiled. Mountain Valley expects to submit the results and recommendations by February 26, 2016.

Supplemental Response submitted February 26, 2016:

A Landslide Mitigation Plan is included as Attachment General 1k.

Respondent: Ricky Myers
Position: Engineering Manager
Phone Number: 724-873-3640

**Mountain Valley Pipeline, LLC
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U.S. Environmental Protection Agency Comments on the Application

Request:

Resource Report 7 – Soils

Page 7-21 Is the SPCC required by FERC? How does the SPCC coordinate with the local community?

Response submitted January 15, 2016:

An SPCC Plan will be submitted to FERC and the West Virginia Department of Environmental Protection and the Virginia Department of Environmental Quality offices as part of the NPDES permit applications. Mountain Valley expects to submit the SPCC Plan to FERC by February 26, 2016.

Supplemental Response submitted February 26, 2016:

The Spill Prevention, Control and Countermeasures Plan for each state are included as Attachment General 1d-1 (West Virginia) and Attachment General 1d-2 (Virginia). The Spill Prevention, Control and Countermeasure Plan was submitted with the West Virginia Erosion and Sediment Control Plan on February 23, 2016. The Spill Prevention, Control and Countermeasure Plan will be submitted to the Virginia Department of Environmental Quality with the Mountain Valley Pipeline final General Erosion & Sediment Control Specification in May 2016.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

**Mountain Valley Pipeline, LLC
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U.S. Army Corps of Engineers Comments on the Application

Request:

A complete wetland delineation package must be submitted to the Corps of Engineers for confirmation.

Response submitted January 15, 2016:

Mountain Valley expects to submit the complete wetland delineation packages to the Corps of Engineers with the Nationwide 12 application process by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Mountain Valley submitted complete wetland delineation packages to the Huntington, Pittsburgh, and Norfolk Districts with the Nationwide Permit Applications on February 25, 2016.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

**Mountain Valley Pipeline, LLC
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U.S. Army Corps of Engineers Comments on the Application

Request:

Was LIDAR utilized for the inaccessible portions of the Virginia pipeline corridor? If so please provide this data with the wetland delineation package. Please provide a map in the wetland delineation package depicting all wetlands along the route calling out those areas that were ground truthed, and all areas the Corps has completed a site visit.

Response submitted January 15, 2016:

LIDAR was used for the inaccessible portion of the Virginia and West Virginia pipeline corridor. This information will be submitted to the Corps of Engineers with the Nationwide 12 application process, which Mountain Valley expects to submit by February 26, 2016. Additionally, infrared analysis was utilized to augment evaluation and delineation of streams, waterbodies, and wetlands where access was not available.

Supplemental Response submitted February 26, 2016:

Maps depicting areas where actual field surveys were conducted and areas where desktop review utilizing LIDAR and infrared analysis was included in the wetland delineation packages submitted to the Huntington, Pittsburgh, and Norfolk Districts with the Nationwide Permit Applications on February 25, 2016. Site visits with the Corps of Engineers were only conducted for the Norfolk District. A map depicting areas of field verification was included in the wetland delineation package with the Norfolk District.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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U.S. Army Corps of Engineers Comments on the Application

Request:

Applicant needs to differentiate between permanent, temporary and conversion impacts to waters of the U.S. to be included in their permit submittal to the Corps.

Response submitted January 15, 2016:

Permanent, temporary and conversion impacts to waters of the U.S. will be clearly defined in the Nationwide 12 Preconstruction Notification submittal to the Corps and the FERC. Mountain Valley expects to submit this by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Permanent, temporary and conversion impacts to waters of the U.S. were defined in the Nationwide Permit Applications submitted to the Huntington, Pittsburgh, and Norfolk Districts on February 25, 2016.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

**Mountain Valley Pipeline, LLC
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U.S. Army Corps of Engineers Comments on the Application

Request:

List alternatives for wet crossings in waters of the U.S. for the state of Virginia.

Response submitted January 15, 2016:

Alternatives for wet crossing in water in Virginia are currently being evaluated in Virginia. The crossing method re-evaluation will be completed on available tracts. Mountain Valley expects to resubmit any changes to FERC by February 26, 2016.

Supplemental Response submitted February 26, 2016:

See the Waterbody Crossing Review included as Attachment RR2-21.

Respondent: John Uhrin
Position: Construction Director
Phone Number: 724-873-3497

**Mountain Valley Pipeline, LLC
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U.S. Army Corps of Engineers Comments on the Application

Request:

Table 2.2-5 has water body width and length of crossing. Please explain the difference in these numbers as the table would indicate that the crossing is greatly different from the water body length.

Response submitted January 15, 2016:

Mountain Valley will submit an updated waterbody table to the Corps as part of its Nationwide permit application, which Mountain Valley expects to submit by February 26, 2016.

Supplemental Response submitted February 26, 2016:

Table 2.2-5 has been revised (see Attachment RR2-18b) for width and length of crossing. See the response to Resource Report 2, Request 18 for further explanation of the differences between waterbody widths and length of crossing.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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West Virginia Division of Natural Resources Comments on the Application

Request:

Resource Report 2 – Water Use and Quality

Table 2-A-2 Waterbodies Crossed by the Mountain Valley Pipeline Project – Summary Impact Type

The “Classification” column seems incompletely populated with information, for example, portions of North Fork Fishing Creek are stocked with trout, Little Kanawha River also has portions stocked with trout and is classed as a protected mussel stream.

Response submitted January 15, 2016:

Mountain Valley expects to submit an updated Table 2-A-2 by February 26, 2016.

Supplemental Response submitted February 26, 2016:

See revised Table 2-A-2 (Attachment RR2-17). Classifications have been identified where information is available and North Fork Fishing Creek and Little Kanawha River have been updated according to West Virginia’s Requirements Governing Water Quality Standards (47CSR2 Title 47 (2014)).

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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West Virginia Division of Natural Resources Comments on the Application

Request:

Resource Report 2 – Water Use and Quality

Table 2-A-2 Waterbodies Crossed by the Mountain Valley Pipeline Project – Summary Impact Type

The “Fishery Type” column also seems incompletely populated with information, for example the definition of WW, CW, and M are not identified in the notes. In addition, there is no B or B1 designation as outlined under 47CSR2.

Response submitted January 15, 2016:

Mountain Valley expects to submit an updated Table 2-A-2 by February 26, 2016.

Supplemental Response submitted February 26, 2016:

See revised Table 2-A-2 (Attachment RR2-17).

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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West Virginia Division of Natural Resources Comments on the Application

Request:

Resource Report 2 – Water Use and Quality

Table 2-A-2 Waterbodies Crossed by the Mountain Valley Pipeline Project – Summary Impact Type

There are no species identified in the “Fish Species” column for any stream in West Virginia. Is this column necessary in this Table?

Response submitted January 15, 2016:

Mountain Valley expects to submit an updated Table 2-A-2 by February 26, 2016.

Supplemental Response submitted February 26, 2016:

See revised Table 2-A-2 (Attachment RR2-17).

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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West Virginia Division of Natural Resources Comments on the Application

Request:

Resource Report 2 – Water Use and Quality

Table 2-A-2 Waterbodies Crossed by the Mountain Valley Pipeline Project – Summary Impact Type

Time of year restrictions are incorrect as presented in the table even though the notes (f) identify restrictions as outlined in USACE 401 Water Quality Certification. Spawning season dates for West Virginia State 401 Water Quality Certification Conditions for Nationwide Permits are April-June for warm water streams and September 15 - March 31 for trout waters and adjacent tributaries. If stream work cannot be avoided during these dates, for the respective stream designation, WRS requests that the impacts be evaluated to aid in our determination to grant or deny a spawning season waiver.

Response submitted January 15, 2016:

Mountain Valley expects to submit an updated Table 2-A-2 by February 26, 2016.

Supplemental Response submitted February 26, 2016:

See revised Table 2-A-2 (Attachment RR2-17).

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645

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Request:

Resource Report 8 – Land Use, Recreation and Aesthetics

Table 8.3-1 Federal, State, Recreation and Conservation Lands Crossed by or Located within 1.25 mile of the Proposed Mountain Valley Pipeline Project

Meadow River WMA in Greenbrier County, WV is noted to have no pipeline crossing, but 0.30 acres of impact and the Crossing Method/Special Construction Measures is identified as “Open Cut”, this should be clarified.

Response submitted January 15, 2016:

As stated in Section 8.3.1.1 of Resource Report 8, the proposed route is located more than 1.0 mile from the Meadow River Wildlife Management Area (WMA) at MP 156.0; however, a laydown yard (PY-003) would impact 0.28 acre of this WMA during operation. The pipeline would have little visual impacts on this WMA due to the distance from the WMA, high relief terrain, and dense forest vegetation between the WMA and the pipeline, and it is assumed that views of the pipeline would be screened. No impacts are expected during operation of the Project.

Supplemental Response submitted February 26, 2016:

During discussions with the West Virginia Division of Natural Resources on February 16, 2016, it was determined that laydown yard PY-003 is on private property within the vicinity of the Meadow River WMA, therefore no disturbance is proposed to the Meadow River WMA property.

Respondent: Megan Neylon
Position: Senior Environmental Coordinator
Phone Number: 724-873-3645