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August 7, 2023

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

Re: Mountain Valley Pipeline, LLC
Docket Nos. CP16-10 & CP21-57
Response to Comments of Preserve Bent Mountain Regarding Pipe Coating

Dear Secretary Bose:

Mountain Valley Pipeline, LLC (Mountain Valley) has reviewed the comments filed on August 2, 2023 by Preserve Bent Mountain in the above-captioned docket. Mountain Valley submits this response to correct the record. Preserve Bent Mountain's comments are the latest in a long series of filings wherein they repeat pipe coating claims that have already been thoroughly reviewed and addressed by the Commission.¹ Ignoring the fact that its pipe coating claims have been addressed by multiple agencies over many years, Preserve Bent Mountain now claims that Mountain Valley's program is an "eleventh hour, shockingly insufficient effort at whitewashing and tarping."² Preserve Bent Mountain includes a series of photographs from the field that fail to accurately represent the extensive pipe coating procedures that Mountain Valley is performing under the close supervision of regulatory agencies.

Preserve Bent Mountain's claims regarding Mountain Valley "whitewashing" the pipe segments with "little consistency or rationale" are not only unsupported but also completely false. Preserve Bent Mountain captions its photographs with speculative conjecture that does not provide an accurate representation of the pipe coating work and completely omits any reference to Mountain Valley's comprehensive pipe inspection and testing program. As Mountain Valley indicated in prior filings, Mountain Valley strictly adheres to all applicable regulatory requirements with respect to inspection of pipe coating. As noted by FERC, Mountain Valley has coated the pipe above the manufacturer's recommendation and then undertakes an intensive inspection process of each and every pipe segment prior to installation. Such inspection process includes checking for dents and third party damage as well as testing the pipe coating and thickness. Such extensive process is designed to ensure pipeline and coating integrity prior to lowering the pipe.

¹ See, e.g., *Mountain Valley Pipeline, LLC*, 173 FERC ¶ 61,026 at P 29 (2020) (FERC reviewed "concern regarding the coating of exposed pipe along the right-of-way." FERC noted that, "as required by the Pipeline and Hazardous Materials Safety Administration, the pipeline coating will need to be inspected before installation and backfilling can occur." FERC concluded: "Based on Commission staff's review of the FBE (fusion bonded epoxy) chalking analysis submitted by Mountain Valley and all other pertinent materials, we find no basis for supplementing the 2017 final EIS to analyze potential toxicity associated with FBE coating or revisiting the discussion therein.").

² Preserve Bent Mountain Letter at 2.

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Preserve Bent Mountain's allegation that Mountain Valley is "coating only top portions of pipes" is false. All of Mountain Valley's coating inspectors are certified by the National Association of Corrosion Engineers. For each pipe segment, Mountain Valley takes dry film thickness readings in accordance with the Society for Protective Coatings Paint Application Standard No. 2 (SSPC-PA2). This industry standard procedure requires taking measurements at five randomly spaced spots per 100 square feet of coated surface. Mountain Valley coating inspectors take three readings at each spot and the readings are averaged. If the average is below the thickness specification, then the entire area is repaired. If the average is above the thickness specification, but there are individual spots that fall below the average, Mountain Valley repairs the individual spots. As depicted in the photo below, Mountain Valley marks the sections of the pipe that fall below the specified minimum so that those sections may be repaired. In addition, Mountain Valley visually inspects the coating on each pipe segment and remediates any observed coating issues as necessary, regardless of the measurement test results. This inspection and repair process exceeds the industry standards set by the National Association of Corrosion Engineers and Society for Protective Coatings.



Mountain Valley then takes coating thickness readings again post-remediation to ensure each pipe segment is within required specifications. Mountain Valley inspects the coating again prior to installation. PHMSA and the Virginia State Corporation Commission (as agent for construction in Virginia) have conducted extensive reviews and on-site inspections of Mountain Valley's remediation procedures and efforts.

In general, portions of pipe segments that were exposed to more direct south-facing exposure are more likely to require additional coating remediation than the underside of such pipe segments or segments that were stored in protected yards or away from sunlight. Regardless, Mountain Valley undertakes a rigorous inspection for each and every pipe segment. Photographs from amateur observers, some of which appear to be taken from moving vehicles or by drone, simply do not portray an accurate picture of the inspection and coating work being done.

With respect to the photographs included in Preserve Bent Mountain’s Exhibit A, Mountain Valley provides the following information:

Photograph Number(s)	Location	Mountain Valley Response
1	Unknown	Preserve Bent Mountain’s claims with respect to the partial coating of the pipe segment are false. Mountain Valley inspects the entire pipe segment per the above-described procedures that exceed industry standards.
2-4	Spread I	The existing coating thickness on pipe in this location measured in July 2023 was less than specification in the 10:00 to 2:00 position and more than specification on the sides and lower portions of the pipe. Mountain Valley prepared the surface of the existing coating and applied additional coating to the top 1/3 of the pipe to bring the coating thickness back to specification.
5-7	Spread I	The “frosting” referenced in the photo captions is newly applied pipe coating. The existing coating thickness on pipe in this location measured in July 2023 was less than specification in the 9:00 to 3:00 position and more than specification on the lower portions of the pipe. Mountain Valley prepared the surface of the existing coating and applied additional coating to the top 1/2 of the pipe to bring the coating thickness back to specification. The brown tarps shown in Photo No. 6 were used to protect pipe segments that had been re-coated on the previous day.
8-12	Spread H	The existing coating thickness on pipe in this location measured in July 2023 were less than specification in the 10:00 to 2:00 position and more than specification on the sides and lower portions of the pipe. Mountain Valley prepared the surface of the existing coating and applied additional coating to the top 1/3 of the pipe to bring the coating thickness back to specification. Preserve Bent Mountain’s statement regarding visible signs of coating degradation is disproven by the coating thickness measurements for pipe in this location.

Photograph Number(s)	Location	Mountain Valley Response
13	Spread H	Plastic sheeting was used to cover the pipe to protect the pipe overnight from moisture (dew or rain) to assist with preparation of the pipe for the following day of work.
14A - 14B	Spread I	The pipe at this location was not resting in a wetland and the “frosting” referenced by Preserve Bent Mountain is newly applied pipe coating. The existing coating thickness on pipe in this location measured in July 2023 was less than specification in the 9:00 to 3:00 position, and more than specification on the lower portions of the pipe. Mountain Valley prepared the surface of the existing coating and applied additional coating to the top 1/2 of the pipe to bring the coating thickness back to specification.
15-16	Spread I	This pipe was being prepared for treatment prior to coating. The work occurred at least 50 feet from Teels Creek per Mountain Valley’s procedures.
17	Spread I	Photo dated July 2, 2021. Mountain Valley inspects each pipe segment for damage and debris prior to lowering the pipe.

As with all construction tasks, Mountain Valley’s pipe coating work is under constant supervision by various agencies including FERC and PHMSA. Mountain Valley takes seriously its commitment to safety and environmental protection and will continue to implement its rigorous pipe coating and testing program as it progresses with construction of the Project facilities.

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

By: 

Matthew Eggerding
Deputy General Counsel