



625 Liberty Avenue, Suite 1700 | Pittsburgh, PA 15222  
844-MVP-TALK | mail@mountainvalleypipeline.info  
www.mountainvalleypipeline.info

March 29, 2018

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

Re: Mountain Valley Pipeline, LLC  
Docket No. CP16-10-000  
Variance Request No. Bradshaw-3


Dear Ms. Bose:

On October 13, 2017, the Federal Energy Regulatory Commission issued an order granting a Certificate of Public Convenience and Necessity to Mountain Valley Pipeline, LLC.

In this filing, Mountain Valley submits Variance Request No. Bradshaw-3, which includes additional temporary workspaces and associated acreage offsets at the Bradshaw Compressor Station site. A detailed variance request form and supporting documents are attached. Mountain Valley requests approval by March 30, 2018.

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

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

By:   
Matthew Eggerding  
Senior Counsel, Midstream

Attachments

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

# MVP Variance Request Form



Variance Request No.: **Bradshaw - 3**

Date Approval Requested by Contractor: \_\_\_\_\_

Date Submitted by Chief Inspector to LEI: \_\_\_\_\_

Date Received by FERC: \_\_\_\_\_

FERC Approval Reference No.: \_\_\_\_\_

Requested By: **Paul Harold**

Spread: **Bradshaw**

Variance Type: **WS**

Request Prepared By \*: **Megan Neylon**

Variance Sequence Number: **003**

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

### Location (Use either Station or Milepost)

Station: **N/A** To: **N/A** Milepost: **N/A** To: **N/A**

Alignment Sheet Number: **4** Tract No.: **WV-WE-4272; WV-WE-4215**

**Current Land Use/ Vegetative Cover:**

*Deciduous Forest*

**Other Agency Jurisdiction:**

**N/A**

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

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

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

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

Wetland or Waterbody ID: **N/A**

Additional Stream footage impacted: **N/A**

Additional Wetland impacts: **N/A**

Net acreage affected: **1.4**

Tree Clearing Required: **Yes**

Acreage of tree clearing: **1.4**

Variance Level:  Level 1     Level 2     Level 3

Variance From:  Permit     Plan     Procedures     EPPM     Specification     Drawing     Mitigation Measure

Line List     Other: Describe: \_\_\_\_\_

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

A natural slip of the hillside was occurring adjacent to the Bradshaw Compressor Station access road. Construction crews need to access two additional work spaces at the location of the slip (approx. 200' x 135' and 230' x 315'), to repair and stabilize the hillside.

List Attachments: Attachment 1 - Resource Map; Attachment 2 - Cultural Resource Concurrence; Attachment 3 - Stream and Wetland Delineation Report

**Variance Justification:**

Access to ATWS locations adjacent to the IFC route are necessary to repair and stabilize the natural hillside slip along the access road.

**For MVP Use Only**

Additional Surveys Required	Surveyed Corridor Description	Additional Surveys Completed
Cultural Survey <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
T & E Survey <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Waterbodies/Wetlands <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Proof of Previous Biological and Cultural Survey Clearance**

Please see the attached email from the stream and wetland delineation team indicating that no resources were identified in the area of the work spaces. Also attached is an email from the WVSHPO indicated their concurrence with Mountain Valley's studies. On January 29, 2018 the USFWS concurred with MVP's proposed process for reviewing variances that require tree clearing. In this instance, MVP is requesting to clear approximately 1.4 acres of trees. To offset this decrease in Myotis bat summer use habitat, MVP has committed to not cut a section of trees along the Bradshaw Compressor Station pad as shown in Attachment 1. The tree acreage from this offset is greater than the tree acreage associated with this variance. In addition, there will be no plant issues per consultation with the USFWS and WVDNR over survey areas. Loggerhead Shrike are not present in West Virginia. Finally, there are no aquatic species concerns because the variance not impacting any aquatic species.

**Landowner:** Mountain Valley Pipeline, LLC  
**Land Agent Contact:** Janna Arnold  
**Landowner Approval Obtained:**  Yes  No

<b>Sign Off:</b>	<b>Name</b>	<b>Signature</b>	<b>Date</b>
Construction Manager	<i>Paul Harold</i>	<i>Paul Harold</i>	3/29/2018
Lead Environmental Inspector	<i>Philip Smith</i>	<i>Philip Smith</i>	3/29/2018
Third Party Compliance Manager or monitor			
ROW Land Agent *	<i>Janna Arnold</i>	<i>Janna Arnold</i>	3/29/2018
Environmental Supervisor	<i>Megan Neylon</i>	<i>Megan E. Neylon</i>	3/29/2018

\*signature denotes confirmed landowner approval

**For FERC Compliance Monitor and Compliance Manager Use Only**

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

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<b>Spread No.:</b>	<u>Bradshaw</u>	<b>Variance Request No.:</b>	<u>Bradshaw - 3</u>
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**VARIANCE CONDITIONS**

Name:		Title:		Organization:	
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Conditions:

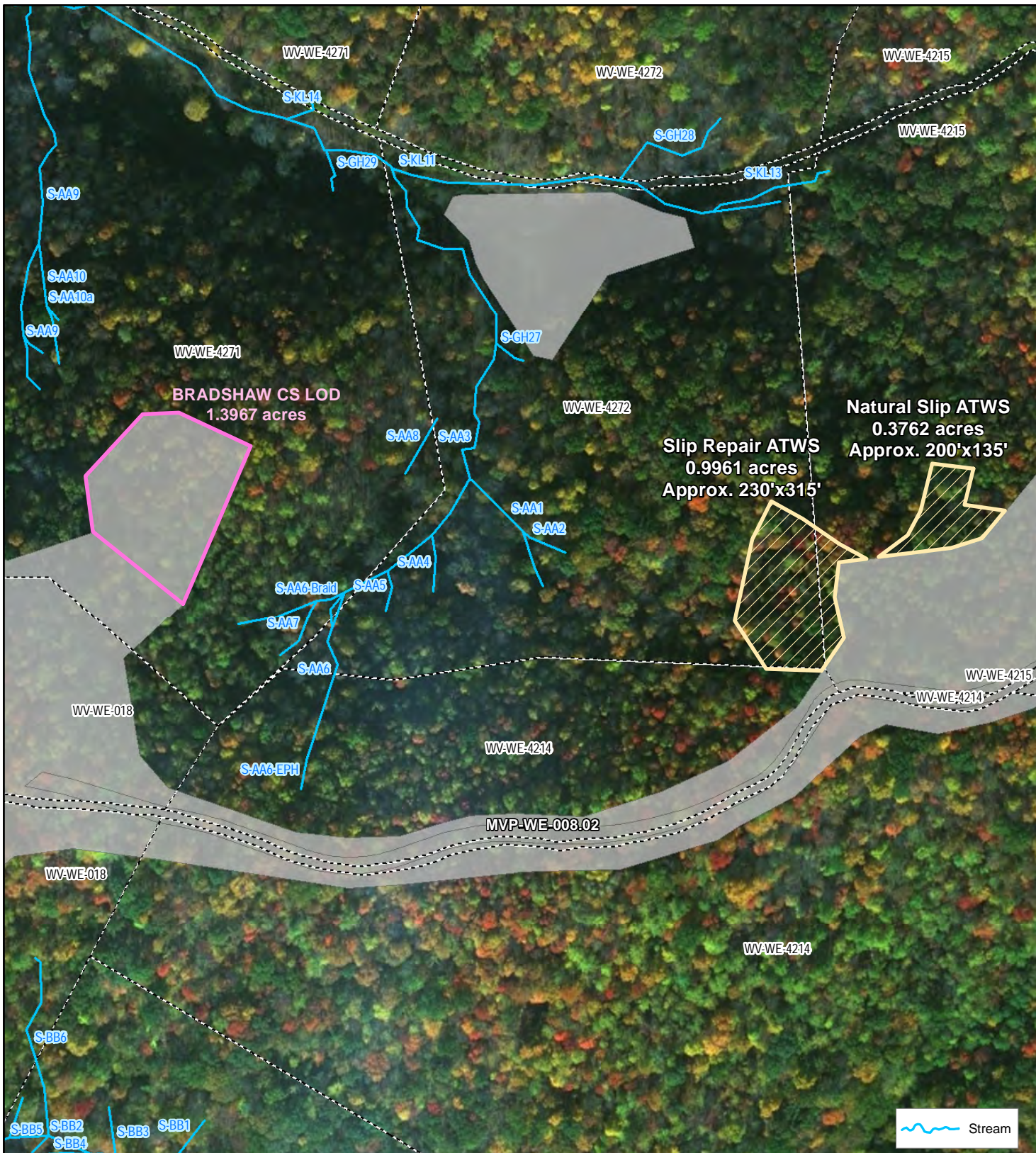
Name:		Title:		Organization:	
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Conditions:

Name:		Title:		Organization:	
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Conditions:

**ATTACHMENT  
1- RESOURCE  
MAP**



**Mountain Valley Pipeline Project**

**Mountain Valley PIPELINE**

FERC Docket No. CP16-10-000

**MVP Variance L3VAR-WV-WE-09**

WETZEL COUNTY

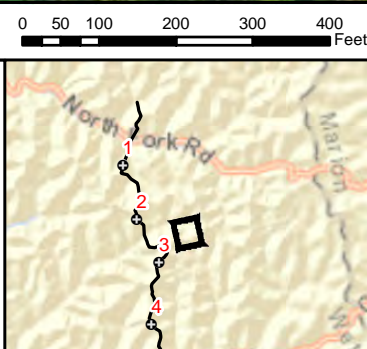
March 2018

NAD 1983 UTM 17N

0 50 100 200 300 400 Feet

**Legend**

- Issued for Construction Milepost
- Issued for Construction Route
- Issued for Construction Limits of Disturbance
- Parcel Boundary
- Eliminated Issued for Construction Limit of Disturbance
- Proposed Variance Additional Temporary Workspace



Data Sources: ESRI Aerial Imagery, All Issued for Construction data was filed with FERC on 12/20/2017.

**ATTACHMENT 2 -  
CULTURAL  
RESOURCE  
CONCURRENCE**

## Neylon, Megan

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**From:** Lamarre, Lora A <Lora.A.Lamarre@wv.gov>  
**Sent:** Thursday, March 29, 2018 8:04 AM  
**To:** Neylon, Megan  
**Subject:** [EXTERNAL] RE: MVP Bradshaw Compressor Station Extra Work Space for Slip

Megan:

We have reviewed the information submitted for the above-referenced project to determine potential effects to cultural resources. As required by Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

It is our understanding that a slip has occurred along the access road to the Bradshaw Compressor Station in Wetzel County, WV. Two workspaces are needed to repair the slip, both of which are located outside of the study corridor that was surveyed for the MVP project. This slip area and proposed workspace locations were visited by personnel from Tetra Tech who conducted a pedestrian survey and excavated two shovel probes. Most of the area was observed to consist of steep terrain. Eroded soils were encountered in the shovel probes. No cultural resources were identified. Based on the information provided in your email, we concur that the creation and use of the workspaces will have no effect on historic properties.

We appreciate the opportunity to be of service. If you have any questions regarding our comments or the Section 106 Process, please contact me at your earliest convenience.

Sincerely,

Lora A. Lamarre-DeMott  
Senior Archaeologist  
WV State Historic Preservation Office  
The Cultural Center  
1900 Kanawha Blvd., East  
Charleston, WV 25305-0300  
304-558-0220 x 711

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**From:** Neylon, Megan <MNeylon@eqt.com>  
**Sent:** Wednesday, March 28, 2018 10:09 PM  
**To:** Lamarre, Lora A <Lora.A.Lamarre@wv.gov>  
**Subject:** MVP Bradshaw Compressor Station Extra Work Space for Slip  
**Importance:** High

Hi Lora,

As discussed this afternoon, a slip occurred on March 27, 2018 at the Bradshaw Compressor Station along the access road. The slip has become progressively worse throughout the day today. As you can imagine, the weather is not helping. The slip continues to get worse as it continues to rain. After speaking with FERC, they recommended that we send you a note about the slip and request permission to repair the area immediately. MVP is requesting two extra work spaces shown on the attached PDF to repair the sliding area.



Because these areas extended outside of our study corridor for the Project, a cultural crew went out and did an investigation today. Below is a summary of their findings. Attached are pictures of the area, outside of our study corridor, that will be disturbed to slope the slip area back into the top of the hill. We would appreciate an email concurring with our assessment that the work will not impact any cultural sites or historical properties as soon as possible.

The portion of the access road (MVP-WE-008.02) for the Bradshaw Compressor, in the area where the slip occurred, was surveyed in April of 2015 by Tetra Tech. This is a public road named Bear Run Road. The results were reported on in Mountain Valley Pipeline Project, Cultural Resources Survey, Volume I Wetzel, Harrison, Doddridge and Lewis Counties, West Virginia (Espino et al. September 2015). No archaeological sites, historic structures, or historic resources were recorded in the vicinity of the slip. The WCDCH concurred with the recommendations provided in the report in comments dated October 6, 2015. The nearest archaeological site reported on in Volume I is 46WZ123, located approximately 2000 feet west-south-west of the slip area. The WVDCH determined the site was not eligible.

Additional work on the access road was conducted in January of 2016 and reported on in *Addendum 1 to Volume 1* (Espino et al. March 2016) The nearest archaeological site 46WZ163, reported on in this volume, is approximately 1,200 feet northeast of the slip area and was determined not eligible by the WVDCH in comments dated December 7, 2016.

Tetra Tech found that the majority of the reroute proposed to avoid the site was sloped in excess of 20 percent and did not require subsurface testing ( see attached photos). The slope is covered is secondary regenerating forest with thick briars characterized by steep slope in the upper eastern half and is abruptly terraced down slope to the north typical of former logging activities. This terraced area varies in slope between 5-35 percent slope and accounts for less than one fifth of the reroute. Two STPs excavated on the terrace benches revealed shallow subsoil capped by a below eroded A-horizon. No artifacts were recovered. The entire reroute was visually inspected to ensure rock overhangs that may have served as shelters for prehistoric peoples were not present. No overhanging rock outcrops were identified. No standing structures or remains of structures were observed during the pedestrian reconnaissance. Based on the results of the testing Tetra Tech recommends that the extra work spaces requested to repair the slide would have no effect on historic properties.

Thank you for your prompt attention to this matter

Megan E. Neylon  
Supervisor - Permitting  
Mobile: 304-841-2086  
Office: 724-873-3645  
2200 Energy Drive, 2<sup>nd</sup> Floor  
Canonsburg, PA 15317  
MNeylon@eqt.com

To learn about EQT's sustainability efforts visit: <https://csr.eqt.com>

**ATTACHMENT 3 -  
STREAM AND  
WETLAND  
DELINEATION  
SUMMARY**

**Neylon, Megan**

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**Subject:** FW: MVP Variance

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**From:** Schumacher, Henry [<mailto:Henry.Schumacher@tetrattech.com>]

**Sent:** Wednesday, March 28, 2018 3:55 PM

**To:** Hoover, Matthew S. <[MHoover@egt.com](mailto:MHoover@egt.com)>

**Cc:** Harold, Paul <[PHarold@egt.com](mailto:PHarold@egt.com)>

**Subject:** [EXTERNAL] MVP Variance

Matt,

On March 28, 2018, Tetra Tech, Inc. (Tetra Tech) surveyed approximately 1.5 acres at a proposed variance location at the proposed Bradshaw Compressor Station in Wetzel Co., WV for wetlands and streams. Wetland delineations were conducted utilizing the Routine On-Site Determination Methodology presented in the US Army Corps of Engineers (USACE) Wetland Delineation Manual (Technical Report Y-87-1) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region (Version 2.0).

During field surveys, Tetra Tech did not identify any wetlands or streams in the survey area.

Henry

Sent from my iPhone