

PRESERVE MONROE

February 16, 2021

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

Dear Ms. Bose,

We are writing to refute the claim made by MVP attorney Todd Normane in a January 26, 2021 letter to FERC (*Document Accession #: 20210126-5040*) that, “Therefore, the best environmental outcome for water quality, aquatic and terrestrial habitat, and the interests of landowners in the vicinity of the Project is for construction to be completed as soon as possible.” Attorney Todd Normane made no distinction in his correspondence between 1) the unnamed and supposedly 'supportive' landowners, 2) the hundreds of landowners MVP sued to essentially 'force' the sale of easements, who may have 'voluntarily' signed those easements, but remain opposed to MVP and 3) the landowners who have yet to sign any easement and whose land has nevertheless been 'taken' by eminent domain.

Many landowners report that they agreed to an easement out of fear of an eminent domain lawsuit. Other landowners who never wanted a pipeline to cross their properties are still in Federal Court fighting this 'taking' of their land. They do not want further desecration of their property. They do not want to see miles and miles of forest being destroyed anywhere in this region. They do not want the contamination of our pure, irreplaceable mountain springs and streams. A significant number of landowners, both on and adjacent to the ROW, have already experienced impacts to their water. Here are three specific examples:

A farmer in Giles County, Virginia, adjacent to the MVP ROW, has reported a complete loss of water on his farm since MVP began construction. He stated that he has had to sell his livestock. He also has two ponds in which he grows commercial fishing bait that have gone dry.

Two landowners in Monroe County, West Virginia have severe turbidity problems in their wells, which are located in karst topography. One of these landowners, adjacent to the pipeline ROW has been transporting water from another location since mid-2018 while the second landowner has to buy his water for drinking and cooking and take his laundry to a Laundromat 25 miles away. Showering and bathing can only be done when the turbidity finally decreases several days after each rain event.

A considerable number of landowners are appalled by the statements made by MVP on their behalf. They do not agree that the action proposed by MVP represents “the best environmental outcome” or

their own "best interests". These landowners have always opposed, and still oppose having the pipeline located on their property or on adjacent property. They reserve their inherent right to decide what is best for themselves, their families, and their communities. In conclusion, our members and friends from across the two Virginias do not agree with MVP's statement that the best approach at this time is "to complete the pipeline as soon as possible" and they are outraged that MVP would dare to come to a conclusion about what is in their best interest.

Additionally, landowners along or near the pipeline route do not want any further disruption to their solitude and peace of mind. People are worn out; they are tired of noise, diesel fumes, detours, road blockages, mud and dust. The prevailing feeling is "Enough is enough!"

Some people have confided that the constant stress they have experienced has impacted their physical and mental health. When they resisted selling easements, they were dragged into court. When they finally got a chance to sleep-in, they were woken up by trees being felled. When they were on an important phone call, workers started blasting through bedrock. They were late for appointments because they got stuck at roadblocks. Every landowner we spoke with, regardless of whether they had owned their land for generations or for a few years, frequently and in some cases almost constantly, felt abused.

Additional concerns that have been raised include:

Threats related to Seismic Zone

The pipeline right of way goes through steep Appalachian Mountains with a history of landslides, compounded by fragile karst topography and the existence of two earthquake zones where three significant earthquakes have occurred since the project began. Hundreds of earthquakes and tremors have been recorded over the last hundred plus years, the most recent one occurred in August of 2020 ([North Carolina earthquake with 5.1-magnitude strikes north of Charlotte at Virginia border - CNN](#)). This makes residents uneasy and is another reason why many are opposed to any further attempts to complete the MVP. (Update, two new earthquakes occurred in the region on 2-11-21 and 2-12-21 and were documented on the FERC Docket CP16-10 by Maury Johnson -*Accession No.: 202102125087* on 2-12-21.)

Threats to water and land

The many stream crossings that may take prolonged periods of time to construct are of great concern to landowners. They are afraid that continued construction will cause more erosion and sedimentation that would imperil their water supplies. These stream crossings may require massive bore pits near water bodies and/or blasting through fragile bedrock. From our experience with the MVP, there is a long list of possible problems that could occur if construction were to be allowed to continue.

As mentioned earlier, MVP has been unable to permanently and effectively 'repair' landslides or control erosion in West Virginia and Virginia in areas where the pipeline is under construction as well as in areas where it has already been 'completed'. MVP likes to call them

'slips', which sounds harmless, however the public has become increasingly aware of the threat these unstable slopes pose to residents and passersby. MVP has already had one 'slip' incident that caused the pipe to have to be removed and repaired (See Attached Roanoke Times article) in Lewis County WV. We are aware that MVP is removing a large section of pipe in another location in that same county. Landowners and citizens in WV have reported additional slips on slopes in Braxton, Summers and Monroe counties to the WV Department of Environmental Protection.

Threat of pipeline explosions

The threat of pipelines exploding is real and deadly serious. A landslide in West Virginia along the TransCanada Leach Xpress Pipeline exploded in June of 2018. In September of that same year the Energy Transfer Revolution Pipeline in Pennsylvania also exploded. Numerous pipeline explosions have occurred across the country in the last 20 years, killing people and causing extensive property damage. This is one of the reasons landowners who live in the 'Area of Critical Concern' aka the 'incineration zone' along the MVP experience an underlying uneasiness and even nightmares. Some are trying to leave the area if possible. If this pipe shifts or is compromised by a 'slip' like the one on Brush Run in Lewis County, it could result in catastrophic failure and explosion. Many people along the MVP route doubt that FERC and PHMSA take pipeline safety seriously enough and this is why they experience putting the pipeline into service as a threat.

Informed landowners and citizens have been fighting against this pipeline for over 6 years because they are aware of the risks that they would be forced to live with forever: a crack, rupture, or leak in a pipe of this size, under more than 1400 psi, could explode at any time, even when brand new. It is not a question of *if*, it is only a question of when and where. Anyone living, working, playing or just driving through the blast zone could be killed or severely injured in such an explosion. Knowing that the MVP crosses the Appalachian Trail on top of Peters Mountain in the heart of the Giles County Seismic Zone, we fear that someone hiking on the AT could also be hurt or killed if an explosion were to occur in that area. As has been pointed out by several residents, escape from an explosion or an ensuing wildfire could be impossible at some points along the pipeline path.

Threat of abandonment

To make matters worse, if the project is put into service and then later abandoned, the entire area across the 300 mile trajectory of the pipeline could potentially become a hazardous waste site as the pipes rust and collapse polluting the streams, aquifer and land across the region.

Most difficult areas remain to be completed

MVP's claim to be 92% completed is dubious at best. Credible data submitted to FERC shows construction is far less complete. In point of fact, the most difficult and fragile areas, steep slopes and stream crossings, represent the bulk of what remains to be completed, which is of tremendous concern to landowners. It should also concern investors. In a September 2, 2020 article in the Virginia Mercury, Dr. Jacob Hileman, a PhD in Environmental Hydrology,

calculated the actual completion figure, including pipe in ground as being closer to 72%. In several areas of West Virginia, MVP is currently removing segments of pipeline already installed, the integrity of which appears to have been compromised by land movement. That work is ongoing. (See attached article from the Roanoke Times, May 3, 2020: "Report of pipeline slips in West Virginia under investigation, raises concern.") Although MVP paints a rosy picture, they may actually be moving backwards in their attempt to complete this pipeline. We would all do well to heed the famous folk saying, "You can put lipstick on a pig, but it is still a pig".

In conclusion, Preserve Monroe members, landowners and concerned community groups along the MVP route **DO NOT** agree that 'completing' this pipeline as soon as possible is in our best interest or in the best interest of reducing greenhouse gas emissions or preserving our precious water supply and bio-diverse environment. We feel that it is imperative now for humanity to focus on what is required for life to continue to exist on this planet. In view of the new Biden Administration policy with respect to the Climate Change Emergency and its goal for a renewable, clean energy future, we join with others from across the region and nation in continuing to call on FERC to cancel this pipeline.

Sincerely,

Preserve Monroe
PO Box 76
Union WV 24983

Please see the following attachments:

- 1-Roanoke Times article
- 2-Landowner and citizen statements

Attachment #1

Report of pipeline slips in West Virginia under investigation, raises concern

Laurence Hammack May 3, 2020

https://roanoke.com/news/local/report-of-pipeline-slips-in-west-virginia-under-investigation-raises-concern/article_05d9ea1e-8944-5a10-a9e9-acad9d709e92.html

Land movement in a construction area shifted a section of the Mountain Valley Pipeline after it was buried along a West Virginia slope, according to a report filed by environmental regulators.

The Federal Energy Regulatory Commission report stated that “crews verified that the installed pipe shifted ... in at least three locations south of Brush Run Road” in Lewis County, about 50 miles from where the natural gas pipeline begins a 303-mile route that takes it through Southwest Virginia.

Inspectors blamed the problem on what’s called a slip, or the gradual movement of land on its own in an area cleared for the pipeline.

Although it was not clear how far the pipe had moved, the report alarmed those who have warned against building such a large pipeline in mountainous terrain.

“That’s a big-time concern,” said Angie Rosser, executive director of the West Virginia Rivers Association.

Had pressurized gas been flowing through the finished pipeline, which has been under construction for the past two years, any underground movement could possibly cause a rupture and explosion, Rosser said.

A Mountain Valley spokeswoman, however, said the FERC report focused on environmental concerns and did not delve into technical issues of pipeline construction.

“At this time, there is no direct information to indicate that the pipe has shifted along this portion of the route and this information will not be known until a full investigation is complete,” Natalie Cox wrote in an email.

After the issue was discovered April 8, an investigation was launched as “an additional precautionary matter,” the email stated.

Crews will dig up the pipe, buried in trenches that are generally 7 to 8 feet deep, to ensure its integrity and placement. “Additional mitigation controls will be installed if necessary,” Cox wrote.

There have been no other issues of this type in completed areas of the project, she said. Construction began two years ago, and Mountain Valley said the \$5.5 billion project is 90% done and slated for completion by the end of the year.

Opponents of the project worry that similar problems with the pipe shifting after it’s buried could occur in parts of Southwest Virginia, where construction is not as far along.

“They have landslides and slips and failures all the time,” said Diana Christopulos, a Roanoke-area environmental advocate who has been monitoring the pipeline since it was first proposed five years ago. “Putting the pipe in the ground does not solve the problem.”

The region’s steep slopes and karst topography make it “pretty challenging terrain,” pipeline safety consultant Richard Kuprewicz said.

Regulators in both Virginia and West Virginia have cited Mountain Valley for failing to comply with erosion and sediment control measures hundreds of times. But the shifting of pipe described in the FERC report was the first of its kind.

Using line locators

The first sign that something was amiss came about a month ago.

According to a weekly summary report of environmental compliance, recently filed on the FERC online docket, the commission’s compliance monitor was notified by Mountain Valley officials of a problem April 8 at the West Virginia construction site.

“Movements of the slips” in at least three locations had caused the 42-inch diameter pipe to shift, the report stated.

A slip, also known as land creep, is the gradual movement of soil and rock down a slope and is not as serious as a landslide, said Kuprewicz, a chemical engineer who worked for years in the gas industry and now consults on pipeline safety issues as president of Accufacts Inc. in Redmond, Washington.

The FERC report does not indicate how far the pipe shifted. Survey crews marked where the pipe had originally been laid, and workers dug potholes and used line locators to determine its current location, the report states.

Asked about the incident last Wednesday, a FERC spokeswoman said the agency would answer emailed questions “as soon as we can.” No response had been received by 5 p.m. Friday.

FERC listed the incident as a “communication report,” meaning that it could be resolved by discussion between its compliance monitor and Mountain Valley representatives.

A communication report is the least serious type of non-compliance listed in FERC’s weekly summary of environmental monitoring. Other write-ups can be for problem areas, non-compliance and serious violations.

Kuprewicz, who reviewed the report on the shifting pipe for The Roanoke Times, said it didn’t contain enough details for him to make an informed opinion about how serious the problem was.

“Land slip on its own is not a big deal, depending on the details,” he wrote in an email. However, “the fact that the document mentions three sites calls for further investigation to see if there is a possible systemic issue for the pipeline and its right-of-way.”

According to Cox, Mountain Valley is designed, like all interstate pipelines, to withstand minor ground shifting as the pipe begins to settle in the final stages of construction.

That may be true, Kuprewicz said, but it's important to monitor a land slip closely to make sure it doesn't get out of hand.

"Land creep could eventually result in rupture if it moves the pipe too much too quickly," he wrote.

An earlier inspection by FERC officials in March — before the shift in the pipeline was discovered — found that two of the three slips at the Lewis County construction site had increased in their size and movement.

The leading cause of slips is poor water management on sloped land, Kuprewicz said. Rainfall "starts to liquify the soil and gravity never shuts off," his email stated.

Cox said the environmental inspector was correct in assessing ground movement so that construction crews could quickly stabilize any areas of concern.

"However, it's important to note that environmental assessments do not necessarily indicate issues with movement or the technical construction of the pipe," she wrote.

Project delayed

By now, Mountain Valley officials had hoped to resume construction of a pipeline that will transport 2 billion cubic feet of natural gas a day to markets along the East Coast.

But except for stabilization and erosion control work, the project remains in a state of limbo.

A series of legal challenges by environmental groups have led to the suspension of three sets of permits — one for the pipeline to pass through the Jefferson National Forest, a second for it to cross more than 1,000 streams and wetlands and a third for it to be built in a way that does not jeopardize endangered or threatened species.

After the most recent lawsuit claimed that protected fish and bats were not properly taken into account by the U.S. Fish and Wildlife Service, FERC last October ordered a stop to all active construction until the issues could be resolved.

The Fish and Wildlife Service began work on a new biological opinion, the document that allows pipeline construction if there is no substantial harm to plants or wildlife. Originally due in December, work on the opinion was extended three times, with the most recent deadline of April 27.

On that day, the service wrote in a letter to FERC that while "considerable progress" had been made, an additional 30 days are needed to complete the biological opinion. A new deadline of May 27 was set.

Another permit needed before work can resume, approval of stream and wetland crossings by the U.S. Army Corps of Engineers, is also facing a delay.

A federal judge in Montana has vacated the Army Corps general permit for stream crossings, known as a Nationwide Permit 12, after opponents of the Keystone XL pipeline filed a lawsuit alleging the Corps did not adequately consider the project's impact on endangered species.

The ruling “has a nationwide effect, is extremely disruptive, and contrary to the public interest,” lawyers for the U.S. Justice Department wrote in a motion seeking a stay of Judge Brian Morris’s ruling. The attorneys also asked Morris to limit the scope of his decision to the Keystone pipeline.

About 5,500 projects, including Mountain Valley, were awaiting approval from the Corps when the permit was struck down, according to the motion. “Many likely have nothing to do with oil and gas pipelines at all,” such as power lines, water mains and broadband cable, the government said.

If the projects were forced to seek individual permits from the Corps, which require more analysis than the Nationwide Permit 12, it would take the agency an average of 264 days to process each case, the motion states.

The Justice Department asked Morris to rule on its request for a stay by May 11. If that fails, it will appeal to the 9th U.S. Circuit Court of Appeals.

Height Capital Markets, an investment banking firm that issues weekly reports on Mountain Valley and other pipelines, wrote in an April 27 update that it was growing “increasingly concerned” about the case’s impact.

“At this point, we believe it’s too early to shift our late 2020 in-service target for MVP and need to see what actions the Trump administration takes,” the report stated, “though the odds of a 2020 completion are certainly trending down.”

Attachment #2

Landowner and Citizen Statements

In response to Letter from Todd Normane, MVP Deputy General Counsel, to "The Service List"

Document Accession #: 20210126-5040

MVP's statement that it is "*in the interest* of landowners in the vicinity" for construction to be completed may have been intended to justify getting the green light from FERC. Nevertheless, it strikes landowners as being disingenuous. And, it begs a transparent answer to a most important question: What is MVP's true underlying interest and intent in completing the pipeline?

In making a decision, all things must be considered and among them, this: To authorize the completion of an interstate gas transmission pipeline for which there may be no future capacity market would put taxpayers at risk of having their hard-earned dollars used to bail out possible losses incurred by the project.

Right now, the most logical and appropriate 'completion' is **remediation** of the innumerable issues still causing harm and hardship to landowners, farms and businesses along the pipeline route. Remediation is the ticket to deliverance and the way to repair relations with fellow humans along the way. To allow the pipeline to go into service could wind up putting local and state governments in the position of having to bear the brunt of cleaning up ongoing mudslides on county roads, for example, and citizens in the untenable position of facing tax levies, land degradation and compromised water supplies.

As a landowner in Monroe County, WV I am deeply concerned about the progressive weakening of adherence to the Rule of Law and to the democratic process. Not only is the right to own property for livelihood and enjoyment being encroached upon but precious resources that may truly be needed in the future are being depleted and often wasted for corporate gain.

Here, I would like to invite FERC to take a moment to think about what some of the highlights from President Biden's inaugural speech actually mean: He calls upon us, the American people, to **"lead not by the example of our power... but by the power of our example."**

He counsels all of us **"begin to listen to one another once again"** and to **"reject the culture in which facts are manipulated and even manufactured."**

This is clearly a call for every one of us to wake up and STAY ALERT, whether we be housewives, politicians, or Commissioners at FERC.

Imagine how momentous it would be if all of us, including FERC, whose task it is to regulate the 'wise use of energy', were to lead by the power of example and take climate change seriously. How would it be if all of us were to **"restore the soul and secure the future of America"** by standing strong behind the President's most quintessential pledge:

"Democracy will not die on our watch!"

Thank you for your attention,
Roseanna Sacco
Sweet Springs WV

The Mountain Valley Pipeline is a fool's project, far below the dignity of any Federal Agency of the United States of America, let alone the Federal Energy Regulatory Commission.

Climate warming is neither the present mission of the FERC nor its future directive. It matters not which administration is in power in government, for government has a mandate to serve the people in the hour of climate crisis which is presently lying fully and heavily upon us.

We bear the weight of responsibility for mankind and the planet's future, the very near and pressing future. I refer to the next nine years. Nine years alone in the history of civilization in which the USA will transform its energy system to sustainable and non-greenhouse gas energy sources.

The Mountain Valley Pipeline is an obsolete concept from what must be a fast melting away era of fossil fuel energy. So be it. There is no time to lose. A healthy future awaits us.

The studies have already been done, although the former FERC EIS on the MVP chose not to include them. Never mind. We all know that change must be made. Now is that time when all good men come to the aid of the planet.

Sincerely,

A Monroe County WV Landowner

DO NOT complete the MVP, restore the land and please leave. The MVP is not needed and a huge environmental and safety risk.

Mr. Okie Dupre
Forest Hill WV

To Whom it may concern,

I wish to comment on the MVP response, " that it is better...to complete the project" is an absurd belief that to continue muddying the waters is how to stop that. NO, the best thing for the environment and everyone concerned locally, is to have MVP seed the corridor for final restoration and to have MVP stop disturbing the soil. MVP knows no construction will happen until after February 18th and maybe not then either.

Continued soil disturbance by MVP is continued disturbance. Maintain an exclusion zone in the middle of the route, Spread G. Extend the exclusion zone from further ground disturbance to the whole route.

Please deny MVP any more permits or variances. Progress forward on the MVP project should be stopped and the entire route abandoned. Karst and vulnerable freshwater are places pipelines are to avoid.

I live near the MVP route and have seen firsthand the destruction of local natural resources. A cave roof was blasted in 2018 in the MVP corridor, Spread G. MVP got a stop work order and stopped blasting. The area is a known karst hazard. Blasted limestone rocks in the corridor were huge with drapery formations that looked like the underside and walls of a limestone cave, and were shoved

to the downhill side of the corridor. Limestone rock pinnacles peak out of the residual and landslide soils on the uphill side. Yellowish brown and strong brown soil mixture smoothed over corridor.

The length of the corridor that was blasted is several hundred feet long, and where blasted cover rocks have fallen into the void (cave) below, sinkholes have formed. There are eleven sinkholes, ten with fencing or double fencing, where the holes are getting bigger. Sinkhole number 10, closest to where blasting stopped, breathes warm air when the snow lies gently on the ground. Sinkholes number 1, in the middle and first to form, and number 9 at the top of the property in the corridor, all breathe. As do several other new sinkholes in this stretch of corridor, just outside of the Jefferson National Forest, in Sinking Creek Valley. This is where the JNF section of pipeline meets the Private section of corridor.

This is also the Exclusion Zone, where construction and trenching has not been done, pipes lying on the bare soil surface marked June 2017, and work stopped before the soil was completely destroyed.

Canoe Cave, a Conservancy cave, is less than one mile downstream. Most caves in the area have connections to each other at some level.

MVP cannot continue to expect a pipeline is safe in Spread G, certainly not installed across a long void, to last long. Pipeline is being replaced all over the MVP route. The route is a poor choice and should be restored and abandoned.

Abandon Spread G and the surrounding spreads that also have karst, Spreads E and F (to the west and north) H and I, to the east. The middle of the MVP route is not suitable ground for trenching and pipeline construction. Have MVP cease construction. There is nowhere safe to go.

Thank You
Nan Gray, LPSS
Newport, VA

The MVP proposal to complete construction as quickly as possible is unacceptable. In my opinion the MVP should be canceled and the damage done be fixed.

Betty Farmer
Monroe County Resident
Salt Sulphur Springs WV

Please be advised that many people and businesses are not in favor of completing the MVP. It is a serious mistake for West Virginia.

Mr. Vernon Berkley,
Former Pence Springs resident now living in White Sulphur Springs, Greenbrier County WV

I can't take the noise from MVP helicopters flying and circling over top of my property all day diving up and down and circling back and forth anymore. They make my heart race. I can feel it! These helicopters make me feel physically out of sorts and very anxious. I can't sleep. Almost impossible to work. I can barely focus and think. I can't take it.

These helicopters make my neighbors' small child cry incessantly due to fear, their dogs are crazy all day and the walls of their house shake. Another neighbor says now "she feels like she is living at the airport". Please, please just stop.

Concerned Franklin County, VA landowner

The originator of this letter (Todd Normane) seems to think that the best plan forward for environmental protection and affected landowners is for the Project to be completed as soon as possible.

As an affected landowner adjacent to the pathway, and as a continuing witness to the workmanship, skill level, and capabilities of the MVP construction effort, I feel that "as soon as possible" will be the continuation of the incompetent slipshod amateur behavior we have come to expect from MVP, here "on the ground".

The FERC has totally failed to regulate the pipeline or the associated planetary destroying natural gas. The FERC has only succeeded in subjugating families and landowners, destroying family farms, and pushing the people out of the way.

Sincerely, A WV Adjacent Affected Landowner

I am Arietta DuPre from Wayside - Monroe County - WV. I live less than 300 feet from the MVP Right of Way. I am responding to a letter submitted by MVP to FERC.

I can sum this up very quickly It is NOT in the best interests of anyone, it is NOT in the best interests of our environment, and it is NOT in the best interests of our wildlife for MVP to complete the pipeline at all, much less quickly. There are literally hundreds of reasons why MVP should not be allowed to finish.

Stop any further work done on the MVP and fix the damage already done. A disaster from the beginning. An assault on the environment and the natural world. SHAME

A WV Landowner affect by the pipeline adjacent to my property, also affected by an access road and work area very near my secluded home.

This statement comes from an affected Summers County Landowner:

It has now been six years since my first contact with the MVP. They lied to me from day one, strung me along, and ignored me to install 3,020' of their pipeline on my property against my will. The steep slope where the pipeline exits my property at SR 12 before crossing the Greenbrier River, in my opinion, is a disaster waiting to happen - the elevation at the top of my property to the Greenbrier River is a difference of about 600' over the approximate 3,200' run, so you can imagine

the pressure buildup right next to SR12. The many well documented complaints prove MVP should not be allowed to complete this project.

2/03/2021

The following document is in response to the letter submitted by Todd Normane, Deputy General Counsel on behalf of Mountain Valley Pipeline/MVP to WVDEP, VADEQ, FERC and ACE staff. The intention of his letter was to present the status of the MVP project and actions MVP plans to take to expedite and complete the Project.

I have included some statements from his letter in quotation marks and included my response following each statement.

1. *"There remains a critical need to complete the Project promptly to meet the natural gas needs of industrial, utility, and other consumers that are relying on Mountain Valley for natural gas."*

Why this statement is made when there is documented evidence of sufficient transmission capabilities of current pipeline infrastructure considering the current Bcf/day production?

2. *"Although the Project has been largely constructed, substantial segments of the right-of-way remain disturbed but temporarily stabilized."*

What does "largely constructed" mean. What an ambiguous term for such a "Project" under scrutiny. Where is the data? What is the data?

3. *"Mountain Valley cannot permanently restore the soils and vegetation on these segments of the right-of-way until construction is complete."*

We question Mr. Normane's understanding of "restore." "Restore" means to "return to a former condition." A 304 contiguous mile, 125-foot-wide swath of deforested, trenched land to be REPLACED with a grassy, treeless strip through verdant mountain forests is NOT restoration.

4. *"We have also heard from many landowners along the route who have suffered from the delays caused by ongoing legal challenges that they want Mountain Valley to complete the construction, achieve final restoration and return their lands for their private use."*

How 'many' landowners has Mr. Normane (and the "we" he mentioned) heard from? Was Survey methodology used" to quantify his report and use the data of his "many" as an adjunct to rationale needed for pipeline completion?" More ambiguity.

Did Mr. Normane explain to those "suffering landowners" that the MVP has facilitated their own legal delays including rushed permitting processes as well as needing to correct the environmental violations reported and **documented** by observers?

I wonder if Mr. Normane reminded those "many landowners" who want, "...final restoration and return (of) their lands for their private use." that their land occupied by the pipeline will never be restored, but forever changed and that their

“private use” does not extend beyond what MVP says they can and cannot do with “their lands” taken through **eminent domain**.

5. *“Therefore, the best environmental outcome for water quality, aquatic and terrestrial habitat, and the interests of landowners in the vicinity of the Project is for construction to be completed as soon as possible.”*

How can denuding forests, trenching detritus, and shoving a 42-inch fracked gas pipeline through its interior be considered “the best environmental outcome for water quality, aquatic and terrestrial habitat?” Regardless of any mitigation measures, the forest will be irreparably changed and damaged. There is no restoration. Streams in areas where trees are permanently removed from the ROW will degrade due to increased water temperatures and construction runoff. The permanently warmed water bodies will no longer hold viable environments for aquatic plants and animals. I could report multiple and dangerous environmental impacts, but water quality is primary concern and can be impacted by other environmental infractions. Water is life.

How does Mr. Normane know that the interests of landowners in the vicinity of the Project is “for construction to be completed as soon as possible?” We do not appreciate the intrusion of his ideas and misrepresentation of my private and public thoughts, interests, and concerns regarding the construction of the MVP.

6. *“Mountain Valley also believes the time and resource necessary to complete these reviews should be minimized by the fact that the forthcoming submissions will consist primarily of minor changes to construction practices that address the environmental impacts the Corps and FERC have already considered.”*

“**Minor** changes to construction practices,” indeed not. While trenchless construction can be considered less harmful to the environment, in this case, it is **not** a minor change to construction practices. In reviewing the current literature, emphasis, across articles was placed on the need for extensive and rigorous geotechnical site investigation when planning bore paths. One of the articles specifically identified the risks of Horizontal Drilling by inexperienced construction execution. This is MVP’s first go at constructing a 42inch fracked gas pipeline. Mr. Normane’s dismissive opinion that the change of construction is minor is irresponsible, dangerous and does not represent Best Management Practices.

7. *“While we may differ on certain issues, we believe that there is common ground for all stakeholders to agree that at this juncture, the best path forward for environmental protection and affected landowners is for the Project to be completed and for the remainder of the right-of-way to be restored as soon as possible.”*

As landowners, or so-called “stakeholders” as the industry identifies, we take great offense to the idea that we would even begin to share “common ground” with MVP in agreeing that a path forward for environmental protection would be completion of this project. The right-of-way can never be **restored**.

The **best path forward** at this **juncture** is to consider the **current data** obtained through on-going analyses regarding, but not limited to the following:

- The market need of the pipeline for public convenience and necessity.
- The need for **more** pipe in the ground for transmission.
- The need for a project that is **fully** permitted and authorized prior to continued construction.
- The need for knowledge and appropriate amelioration of Environmental Impacts.
- The need in protecting natural resources that contributes to the public's well-being.
- The need in preventing harm.

Please, Mr. Normane, never again assert what is the "best path forward for landowners" or what they have "suffered" without your firsthand knowledge of every single landowner's response to your Project.

Thank you,
Bruce and Mary Beth Coffey
Landowners/Caretakers, "Stakeholders" Bent Mountain, VA

Please accept this statement regarding the proposal from MVP to complete construction as the best path forward for landowners in the area. The MVP should not be completed but should be canceled and the damage already done be repaired as soon as possible. That is the most environmentally responsible action.

Mr. and Mrs. Larry Wayne Tilley
Monroe County Landowner adjacent to MVP Wayside WV.

Dear Ms. Bose,

I am infuriated about MVP's continued refusal to acknowledge our area's most critical geological feature, the fragile underground limestone formations known as KARST, and located in MVP's path primarily in Monroe County, WV and in Giles County, VA. As FERC continues its review of the validity of MVP's environmental protections, please consider the following event which devastated Mountain Lake, formed 6,000 years ago and one of only two natural lakes in Virginia.

The Virginia Lime Company operates a limestone mine in Pembroke, VA in the immediate vicinity of MVP's route. In 1999 while mining operations were working east towards Mountain Lake and about a mile into this underground mountainous, karst region, an unusually large amount of frigid water began gushing forth. Not surprising is the fact that this was the exact time when Mountain Lake started its devastating drainage. At least two Monroe County residents were employed by the limestone mine company and witnessed this environmental disaster. Needless to say, no study or report publically revealed the cause of Mountain Lake's rapid demise. At present Mountain Lake is but a puddle of its former geological status.

Underground water sources along MVP's 303-mile route have not been scientifically studied nor documented in such a way to ensure the protection our precious water resources. Peters Mountain comprised of majestic limestone and running for 45 miles as the backbone of Monroe County, WV,

is a primary source of water for many local citizens and for 66% of our county's municipalities. While fossil fuels can be replaced by wind and solar operations, clean water is irreplaceable.

Please, FERC, now is the time to be a global, environmental leader.

Stand firm, Stop the MVP now.

Respectfully,

Jill Fischer, Monroe Co Citizen

I live about a mile from the pipeline. I see it every day from where I live. It's not easy for anyone in the community to have MVP's presence in the county last so long. But the permanent danger this pipeline poses far outweighs all other inconveniences. If it takes extra time to determine that the MVP should not be placed into service, that's okay. Far better for our waters, for the safety of our communities all along the line, and for our shared future on earth.

Concerned resident of Monroe County, WV

I concur with others in opposition to speaking for me! End this ridiculous money pit now before irrefutable harm is done to the environment and the citizens.

Mary E. Rives --- Bent Mountain, VA

My husband Steve and I are affected landowners of the Mountain Valley Pipeline. I have witnessed and documented the destruction this construction has caused on our property (of 38 years) and the neighboring properties. Since construction began, we have seen incredible disruption of our 2 creeks, and major runoff of silt laden water into Teel Creek from the field this pipe is delving through. Construction practices are shoddy, and left the uncovered pipe floating in a trench in the floodplain here for over a year. The water level varied as much as 24 inches, moving approximately 36,000 pounds of pipe up and down for over a year. My calls to FERC and the PMSHA on this issue (July 17, 2019) were referred to the Department of Transportation Pipeline Safety, where Tanya Davis referred me to the Community Liaison Enforcement Service and were never answered or returned by Ian Wood. I called Matt Clark about my concerns for the welds in the trench, and he assured me the welds would be checked. Before that could happen, the trench was drained over a 2 day period on Sept 3rd and 4th, with the water the pipe had been soaking in filtered through a straw bale filter onto the fields, where it could again be tainting the soil of our fields. The pipe was then immediately buried on Sept 5th. Now for the project to continue, these pipes will have to be dug up, further endangering the safety of the pipe welds and pipe coatings. This spells trouble for the future of our safety from explosions and leaks, and the quality of our water.

On Jan 14th and 15th of 2018, I spent the day in Roanoke in judge Dillon's courtroom waiting to testify about concerns regarding our property. We heard testimony from MVP's agents that they were concerned that the pipe be buried as soon as possible because the coating on the pipe would be compromised by sitting in the elements for long periods of time. We have pipe in our field and on our neighbor's properties that has been sitting in the elements for almost 2 years. We have

demonstrated pipe coating wipe off with the touch of our hand, as well as areas of pipe with gouges in the finish, and large areas of coating scraped off during handling.

On that same day in court we also heard detailed scientific testimony from Dr Pamela Dodd, water and soil expert formerly of the DEQ in West Virginia, as to the effects this MVP project would have on the water supply if it crossed the 300 waterways across our states. Bottom line, she said it won't happen right away in all instances, but it would affect the water along the entire pipeline path. It has already been reported in many places, and the waterways have not been crossed yet. Runoff from our fields here, with years of chemicals sprayed on them, has already poured into Teel Creek during the early construction here in this floodplain. It will only get worse if this work is allowed to continue.

MVP is an environmental disaster in the making and must be stopped before irreversible cataclysmic further harm is done. MVP's Todd Normane's statement infuriates me beyond what I'm able to express in words!

Anne W. Bernard Affected Landowner Franklin County Virginia

In the first place this pipeline should never have been allowed to be built in this Karst topography area with steep slopes, over water recharge areas, through earthquake zones, cutting trees off steep slopes that were holding back the soil from slippage.

Now we have slides on steep slopes where the trees have been removed and it has been graded off and pipe put in the ground. We have water sources effected, being contaminated by runoff from muddy slopes and from chemicals being leached into the water from the pipe coating making the water unfit to drink.

Because of the above this pipeline does not need to be finished as soon as possible it needs to be stopped as soon as possible to save our water supplies, our land, environment and our lives.

Concerned Adjacent Landowner,

Paula Mann

My well water has been affected by construction of the MVP and I am hauling water to use for drinking and cooking. I am deeply concerned if this construction continues on this pipeline that I will have no water at all. This pipeline should not be allowed to continue it needs to be stopped now before all the water in this area is completely destroyed or contaminated so bad that it can never be uses for anything.

Herman Mann
Monroe County Adjacent Landowner

As a landowner whose land is adjacent to and in sight of the MVP right of way in Monroe County, WV, I urge FERC to reject Mr. Normane's and deny the MVP proposal to complete the pipeline.

Mrs. Cynthia Tilley Clements
Wayside- Talcott RD
Ballengee, WV 24981

I concur with most if not all of the statements made above. Mr. Normane does not speak for me or a large number of landowners and other citizens and the many many people that will be affected by the completion of the MVP. It is time that FERC do their job and cancel the many projects across the country that will only create harm to people across the globe. The Era of Fossil Fuel dependency or necessity is over. Despite what MVP or my Senator Joe Manchin may say:

We do not need the MVP, the Keystone XL or anymore mega- pipelines!!!!

Maury Johnson Severely Impacted Landowner, Ellison Ridge Road, Greenville, Monroe County WV.