

September 2, 2025

Ms. Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

RE: OEP/DG2E/Gas Branch 3
Mountain Valley Pipeline, LLC
Docket No. CP25-60-000
§ 375.308(x)

Dear Secretary Reese:

On February 3, 2025, Mountain Valley Pipeline, LLC filed an application in the above-captioned docket to amend its Certificate of Public Convenience and Necessity for the Southgate Project. On August 25, 2025, Commission Staff issued Environmental Information Request 4. Mountain Valley submits herewith responses to the Request.

If you have any questions, please do not hesitate to contact me at (415) 774-3104 or jbrough@sheppardmullin.com. Thank you.

Respectfully submitted,

/s/ Jennifer Brough
Jennifer Brough
Counsel to Mountain Valley Pipeline, LLC

cc: Olivia Yu - FERC OEP

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
Dated August 25, 2025**

Request:

General

Question 1

In section 9.2.5.1 of Resource Report (RR) 9, Mountain Valley states “additionally, note that for the types of sources of greenhouse gas (GHG) emissions associated with the Amendment Project construction, total CO₂ is essentially the same as CO₂e because the CO₂ component of CO₂e for these sources is much greater than 99 percent.” However, our climate change analysis requires CO₂e, therefore, revise tables 9.2-5 (labeled table 9.2-2 in Mountain Valley’s August 8, 2025 filing) and 9.2-6 to include construction emissions of CO₂e for the Amendment Project.

Response:

Revised Tables 9.2-5 and 9.2-6 that include construction emissions of CO₂e for the Amendment Project are provided below.

Table 9.2-5									
Estimated Construction Emissions from the Amendment Project – 2027									
Source	2027 Construction Emissions (TPY)								
	CO₂e	CO₂	CO	NO_x	PM₁₀	PM_{2.5}	SO₂	VOC	HAPS
<i>Meter Stations</i>									
Construction Equipment Engines	1261	1260	0.42	1.35	0.08	0.08	0.00	0.12	0.05
On-Road Vehicle Travel	507	493	1.69	0.48	0.01	0.01	0.00	0.18	0.04
Off-Road Vehicle Travel	NA	NA	NA	NA	60.75	6.07	NA	NA	NA
Earthmoving Fugitives	NA	NA	NA	NA	5.25	0.53	NA	NA	NA
Open Burning	17.17	17.17	0.75	0.02	0.09	0.09	NA	0.13	NA
Wind Erosion	NA	NA	NA	NA	0.76	0.08	NA	NA	NA
Meter Station Total	1784	1770	2.87	1.86	66.94	6.86	0.01	0.42	0.10
<i>H-650 Pipeline</i>									
Construction Equipment Engines	49894	49889	17.18	69.68	3.02	2.93	0.14	3.51	1.53
On-Road Vehicle Travel	2534	2491	15.81	1.78	0.05	0.05	0.01	1.26	0.34
Off-Road Vehicle Travel	NA	NA	NA	NA	209.45	20.94	NA	NA	NA
Earthmoving Fugitives	NA	NA	NA	NA	380.10	38.01	NA	NA	NA
Open Burning	3472	3472	152.62	4.33	18.62	18.62	NA	26.19	NA
Wind Erosion	NA	NA	NA	NA	54.71	5.47	NA	NA	NA

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Table 9.2-5									
Estimated Construction Emissions from the Amendment Project – 2027									
Source	2027 Construction Emissions (TPY)								
	CO ₂ e	CO ₂	CO	NO _x	PM ₁₀	PM _{2.5}	SO ₂	VOC	HAPS
H-650 Pipeline Total	55901	55853	185.62	75.78	665.95	86.02	0.15	30.96	1.87
Pipeline in Pittsylvania, VA	47005	46978	159.79	64.28	495.19	66.84	0.12	27.17	1.48
Pipeline in Rockingham, NC	8896	8875	25.82	11.50	170.76	19.18	0.03	3.79	0.39
2027 Amendment Project Total:	57686	57623	188.49	77.64	732.89	92.88	0.15	31.38	1.97
NA indicates that the specific pollutant emissions are not expected from that source. NO _x = nitrogen oxide									

Table 9.2-6									
Estimated Construction Emissions from the Amendment Project – 2028									
Source	2027 Construction Emissions (TPY)								
	CO ₂ e	CO ₂	CO	NO _x	PM ₁₀	PM _{2.5}	SO ₂	VOC	HAPS
<i>Meter Stations</i>									
Construction Equipment Engines	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
On-Road Vehicle Travel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Off-Road Vehicle Travel	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Earthmoving Fugitives	NA	NA	NA	NA	0.00	0.00	NA	NA	NA
Open Burning	NA	NA	NA	NA	0.00	0.00	NA	NA	NA
Wind Erosion	0.00	0.00	0.00	0.00	0.00	0.00	NA	0.00	NA
Meter Station Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>H-650 Pipeline</i>									
Construction Equipment Engines	3828	3827	0.71	3.14	0.14	0.14	0.01	0.17	0.07
On-Road Vehicle Travel	215	210.39	1.14	0.15	0.00	0.00	0.00	0.09	0.02
Off-Road Vehicle Travel	N/A	NA	NA	NA	19.13	1.91	NA	NA	NA
Earthmoving Fugitives	N/A	NA	NA	NA	221.73	22.17	NA	NA	NA
Open Burning	0	0.00	0.00	0.00	0.00	0.00	NA	0.00	NA
Wind Erosion	N/A	NA	NA	NA	31.92	3.19	NA	NA	NA
H-650 Pipeline Total	4042	4038	1.85	3.29	272.91	27.42	0.01	0.26	0.09
Pipeline in Pittsylvania, VA	3382	3379	1.20	2.76	226.18	22.72	0.01	0.19	0.07
Pipeline in Rockingham, NC	660	658	0.65	0.53	46.73	4.69	0.00	0.07	0.02
2027 Amendment Project Total:	4042	4038	1.85	3.29	272.91	27.42	0.01	0.26	0.09
NA indicates that the specific pollutant emissions are not expected from that source. NO _x = nitrogen oxide									

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**Responses to FERC Office of Energy Projects Environmental Information Request 4
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Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

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Request:

MVP's July 15, 2025 EIR #2 Responses Filing

Resource Report 7 – Soils

Question 1

Mountain Valley's response to RR 7 Number (No.) 2 states "Mountain Valley will continue to coordinate with the Virginia and North Carolina [Department of Environmental Quality] DEQ during the preparation of the Amendment Project's [Erosion and Sediment Control] E&SC plans. Changes to these plans and [best management practices] BMPs will be made to reflect the Amendment Project route, rather than the Original Certificate Project route." Provide an update on the status of revisions to the E&SC plans for the Amendment Project including when Mountain Valley expects to file them with the Commission

Response:

Mountain Valley continues to coordinate with the Virginia Department of Environmental Quality ("VADEQ") and North Carolina Department of Environmental Quality ("NCDEQ") while preparing the Amendment Project's erosion and sediment control ("E&SC") plans. Mountain Valley expects to complete the plans in the fourth quarter of 2025 or early in the first quarter of 2026 and will file them with the Commission once complete.

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

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Resource Report 9 – Air and Noise Quality

Question 1

In its response to RR 9 No. 8, Mountain Valley stated “Noise surveys will be conducted for any additional areas identified to potentially require 24-hour construction. Additionally, noise surveys for applicable crossings (i.e., conventional bores) are being prepared. Mountain Valley expects to file these noise studies in August 2025.” Provide an updated status (including expected filing date) for these noise studies.

Response:

The noise studies for applicable crossings (i.e., conventional bores) are included as Attachment 1 to this Environmental Information Request response.

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

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Request:

Attachment 1-2 – Updated Alignment Sheets (Appendix 1-A)

Question 1

Regarding the alignment sheets clarify why:

- a. the alignment sheet depicts stream S-B044a as separate polygon features rather than as a linear feature;
- b. the alignment sheets depict streams S-A007, S-A069, S-A065, S-B027, S-B007, S-B006, and S-B013 (along access roads) as separate polygon features rather than linear features. Clarify if this is due to existing culverts; and
- c. Wetlands W-B001a and W-B001b (as listed on appendix 2-B [appendix G-3]) were not identified on the alignment sheets.

Response:

- a. Stream S-B044a is depicted as separate polygon features on the alignment sheets due to the presence of an existing culvert, which divides the stream into two distinct polygons rather than a single continuous linear feature.
- b. Streams S-A007, S-A065, S-A069, S-B006, S-B007, S-B013, and S-B027 are depicted as separate polygon features on the alignment sheets due to the presence of existing culverts within each stream segment, which results in the features being mapped as multiple polygons rather than as single continuous linear features.
- c. Wetlands W-B001a and W-B001b are shown on Page 103 of the Updated Appendix 1-A (Attachment 1-2) alignment sheets (Drawing No. PA-RONC-H-650-010A) that were filed as part of Mountain Valley's Environmental Information Request response filed on July 15, 2025.

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

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General

Question 1

Regarding General No. 2, provide new tables (not a revision of the previously provided tables), which denote only additional impacts on each resource (such as waterbodies, wetlands, geology, soils, etc.) as a result of updated surveys (already completed) or updated publicly available information, within the certificated Project workspace that is being retained for the Amendment Project. Denote items that were included due to updated surveys and which were included due to updated publicly available information (via asterisk, footnote, or color coding).

Response:

In developing the Amendment Project, Mountain Valley utilized updated publicly available datasets and newly collected survey data in order to validate the conclusions presented in the Docket No. CP19-14-000 Final Environmental Impact Statement ("FEIS"), dated February 2020. This approach was necessary to ensure that environmental conditions had not changed in ways that would alter the impact assessments as compared to the Original Certificated Project. The updated data helped to confirm that the findings and mitigation measures outlined in the FEIS remain accurate and appropriate under current conditions.

While the data has been updated to reflect current site conditions and recent updates to public datasets, the pipeline construction procedures and minimization measures outlined in the original FEIS remain applicable and appropriate for the Amendment Project. These measures continue to represent best practices for reducing environmental impacts and should be considered consistent with the original project commitments.

Tables presented in Mountain Valley's Environmental Information Request response filed on August 8, 2025 are reflective of the incorporation of both updated publicly available data and new survey data (where applicable) from the FEIS. The tables were generated and impacts calculated based on the Amendment Project and incorporate the minor alignment shifts that occurred as a result of safety and operational considerations

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with respect to the proposed Transcontinental Gas Pipe Line Company (“Transco”) Eden Loop (as presented in Mountain Valley’s Environmental Information Request response filed July 30, 2025). A description of the updated information by resource category is presented below.

Waterbodies/Wetlands: Mountain Valley conducted wetland delineations along the Amendment Project route (including both areas that were previously certificated and in new areas that were located outside the previously certificated workspaces) in late 2024 and early 2025. The updated wetland delineations were necessary in light of the fact that environmental conditions may have changed due to natural processes or human activity.

To ensure compliance with federal and state permitting requirements and to support sound environmental decision-making, Mountain Valley initiated new field surveys to capture current site conditions.

In addition, Mountain Valley’s 2024-2025 survey data was also reviewed and modified with the U.S. Army Corps of Engineers (“USACE”), VADEQ, and NCDEQ as part of the required state permitting processes.

Tables for waterbodies and wetlands crossed by the Amendment Project are provided as Attachment 2 of this Environmental Information Request response:

Appendix 2-A: Waterbodies Crossed by the Amendment Project

Appendix 2-B: Wetlands Crossed by the Amendment Project

Threatened and Endangered Species: Mountain Valley reinitiated consultation with the U.S. Fish and Wildlife Service (“USFWS”) and relevant state agencies to ensure that the Amendment Project reflects the most current information on species presence, habitat conditions, and regulatory status. Since the 2020 FEIS, new survey data have been collected, and land use conditions have changed in some areas along the Amendment Project route. Additionally, the status of certain species may have changed, such as new listings under the Endangered Species Act (“ESA”) or updated critical habitat designations, which could affect the project’s potential impacts. Reinitiating consultation ensures that the Amendment Project remains compliant with federal and state wildlife protection laws and that any necessary avoidance, minimization, or mitigation measures are based on the best available science.

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Cultural: To ensure that the Amendment Project reflected the most current cultural resource information, Mountain Valley conducted a comprehensive re-review of relevant state databases and records for the Amendment Project. This ensured that any potential impacts to historic or archaeological resources were properly identified and addressed, as new sites may have been recorded, existing site boundaries may have changed, and former interpretations or significance determinations may have been updated. Cultural resource survey data for the Original Certificated Project route was utilized in addition to new surveys that were undertaken in 2024 in areas of the Amendment Project that were not previously surveyed due to access, or in areas that were located outside of Original Certificated Project workspaces. All of this data was presented in Resource Report 4 of Mountain Valley’s February 3, 2025 Amendment Application.

Tables of Previously Recorded Archaeological Resources and Aboveground Resources within 0.5 miles of the Amendment Project in Virginia and North Carolina in areas outside of the Original Certificated Project footprint were presented in Attachment G-1 of Mountain Valley’s Environmental Information Request response filed on August 8, 2025.

Comparison tables of these resources with those presented in the FEIS were presented in Attachment G-3 of Mountain Valley’s Environmental Information Request response filed on August 8, 2025.

Geology: To ensure that the Amendment Project reflected the most current geological information, Mountain Valley conducted a comprehensive re-review of the publicly available databases in order to complete its analysis and confirm the conclusions from the FEIS. Additionally, other information was revised from the Original Certificated Project to reflect only the Amendment Project footprint.

Mountain Valley’s revised geology tables, as presented in Attachment G-3 of Mountain Valley’s Environmental Information Request response filed on August 8, 2025 reflect this updated data.

Soils: To ensure that the Amendment Project reflected the most current soils information, Mountain Valley conducted a comprehensive re-review of the Natural Resources Conservation Service (“NRCS”) Soil Survey Geographic Database (“SSURGO”), which was updated in October 2024. All SSURGO data is refreshed every year on October 1.

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Mountain Valley's revised soils tables, as presented in Attachment G-3 of Mountain Valley's Environmental Information Request response filed on August 8, 2025, reflect this updated data.

Land Use, Recreation: Impacts to land use and recreational areas are reflective of the incorporation of updated survey data and changes in land use conditions over times since the issuance of the 2020 FEIS.

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Position: Project Manager
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General

Question 2

Regarding General No. 4, provide new tables (not a revision of the previously provided tables), which denote only Project components within the certificated Project (MP 0 to MP 31.3) that have been removed and would not be utilized for the Amendment Project (e.g., additional temporary workspace (ATWSs) and access roads, groundbeds, mainline valve sites, contractor yards, etc.).

Response:

A summary table of major project facilities and components that have been removed and would not be utilized for the Amendment Project is provided in Table A below. In general, Original Certificated Project Components from MP 31.3 to former MP 75.2 in North Carolina are no longer applicable to the Amendment Project and have been removed.

Table A		
Summary of Major Original Certificated Project Components that have been Removed and will not be Utilized for the Amendment Project		
Type of Original Certificated Project Component	Original Certificated Project Component Name/ID	Justification
Pipeline	H-605 Pipeline	0.5 mile of pipeline no longer applicable to the Amendment Project
Pipeline	H-650 Pipeline (portion)	From MP 31.3 to former MP 75.2 in North Carolina is no longer applicable to the Amendment Project
Aboveground Facility	Lambert Compressor Station	No longer applicable to the Amendment Project
Aboveground Facility	T-15 Dan River Interconnect	Renamed to "Dan River Interconnect #1"
Mainline Valve	MLV 1/Lambert Compressor Station	No longer applicable to the Amendment Project
Contractor Yard	CY-22	No longer applicable to the Amendment Project
Contractor Yard	CY-03	No longer applicable to the Amendment Project
Contractor Yard	CY-19	No longer applicable to the Amendment Project

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Table A		
Summary of Major Original Certificated Project Components that have been Removed and will not be Utilized for the Amendment Project		
Type of Original Certificated Project Component	Original Certificated Project Component Name/ID	Justification
Additional Temporary Workspace ("ATWS")	1001D	No longer applicable to the Amendment Project
ATWS	101C	No longer applicable to the Amendment Project
ATWS	101G	No longer applicable to the Amendment Project
ATWS	1001B	No longer applicable to the Amendment Project
ATWS	1089	No longer applicable to the Amendment Project
ATWS	1097	No longer applicable to the Amendment Project
ATWS	1120C	No longer applicable to the Amendment Project
ATWS	1132A	No longer applicable to the Amendment Project
ATWS	1136C	No longer applicable to the Amendment Project
ATWS	1136D	No longer applicable to the Amendment Project
ATWS	1136E	No longer applicable to the Amendment Project
ATWS	1147B	No longer applicable to the Amendment Project
ATWS	1173M	No longer applicable to the Amendment Project
ATWS	1190A	No longer applicable to the Amendment Project
ATWS	1190B	No longer applicable to the Amendment Project
ATWS	1192	No longer applicable to the Amendment Project
ATWS	1194	No longer applicable to the Amendment Project
ATWS	1207	No longer applicable to the Amendment Project
ATWS	1213D	No longer applicable to the Amendment Project
ATWS	1229A	No longer applicable to the Amendment Project
ATWS	1230A	No longer applicable to the Amendment Project
ATWS	1230B	No longer applicable to the Amendment Project
ATWS	1238	No longer applicable to the Amendment Project
ATWS	1250	No longer applicable to the Amendment Project
ATWS	1251	No longer applicable to the Amendment Project
ATWS	--	All ATWS from MP 31.3 to former MP 75.2 in North Carolina is no longer applicable to the Amendment Project
Temporary Access Road ("TAR")	TA-PI-000B	This access road has been removed and will not be used for the Amendment Project
Permanent Access Road ("PAR")	PA-PI-001C	This access road has been removed and will not be used for the Amendment Project
PAR	PA-PI-001A	This access road has been removed and will not be used for the Amendment Project
PAR	PA-PI-001B	This access road has been removed and will not be used for the Amendment Project
TAR	TA-PI-040	This access road has been removed and will not be used for the Amendment Project
TAR	TA-PI-040A	This access road has been removed and will not be used for the Amendment Project

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Table A		
Summary of Major Original Certificated Project Components that have been Removed and will not be Utilized for the Amendment Project		
Type of Original Certificated Project Component	Original Certificated Project Component Name/ID	Justification
TAR	TA-PI-049	This access road has been removed and will not be used for the Amendment Project
TAR	TA-PI-063	This access road has been removed and will not be used for the Amendment Project
TAR	TA-PI-065	This access road has been removed and will not be used for the Amendment Project
TAR	TA-PI-065A	This access road has been removed and will not be used for the Amendment Project
TAR	TA-RO-000A	This access road has been removed and will not be used for the Amendment Project
TAR	TA-RO-082C	This access road has been removed and will not be used for the Amendment Project
TAR	TA-CA-105	This access road has been removed and will not be used for the Amendment Project
TAR	TA-AL-195	This access road has been removed and will not be used for the Amendment Project
TAR	TA-AL-196	This access road has been removed and will not be used for the Amendment Project
TAR	TA-AL-197	This access road has been removed and will not be used for the Amendment Project
PAR and TAR	--	All PAR and TAR from MP 31.3 to former MP 75.2 in North Carolina is no longer applicable to the Amendment Project

Respondent: James Sabol
Position: Project Manager
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General

Question 3

Provide a new table (not a revision of the previously provided tables), which denote which access roads are new for the Amendment Project and which have been modified for the Amendment Project. Include acres of impacts (for construction and operations).

Response:

New access road tables are included in Attachment 4 of this Environmental Information Request response. These tables have been color-coded to indicate the access roads that have been removed, added, or modified from the Original Certificated Project.

- Red shading denotes that the access road has been removed since the February 2020 FEIS.
- Green shading denotes that the access road is new since the February 2020 FEIS.
- Blue shading denotes that the access road or portions of the access road that have been modified since the February 2020 FEIS.

Additionally, an access road table that lists the access roads for the Amendment Project that are wholly or partially outside the Original Certificated Project workspace are included in the New Appendix 1-F in Attachment 3 of this Environmental Information Request response. Acreages and lengths provided within this table (New Appendix 1-F) are for the portions of the access roads located outside the Original Certificated Project.

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
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General

Question 4

In its response to General No. 5, Mountain Valley indicated that electrical resistivity surveys would be completed at the Sandy River crossing in Q3 2025. Provide any updates regarding the status of these surveys and a projection of when the results would be filed with the Commission.

Response:

Mountain Valley is currently scheduling the electrical resistivity surveys to be completed in September 2025, the results of which will be provided in a report anticipated to be filed with the Commission in October 2025.

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

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Request:

Resource Report 1 – General Project Description

Question 1

Provide an updated table 1.7-1 (Anticipated Permits and Consultations for the Amendment Project).

Response:

An updated Table 1.7-1 is presented below.

Updates to Table 1.7-1			
Anticipated Permits and Consultations for the Amendment Project			
Agency	Permit/Approval/ Consultation <u>a</u>/	Anticipated Submittal/ Initiation Date	Anticipated Permit Receipt/ Completion Date
Federal			
Federal Energy Regulatory Commission	Natural Gas Act, Section 7; Amendment Certificate for construction and operation of interstate natural gas pipeline	February 2025	December 2025
U.S. Army Corps of Engineers Norfolk District Wilmington District	Individual Section 404 Permit for impacts on waters of the U.S., including wetlands	April 2025	March 2026
U.S. Fish and Wildlife Service Virginia North Carolina	Consultation under Section 7 of the Endangered Species Act for potential impacts on federally protected species Consultation regarding impacts on migratory birds and eagles	Initiated May 2025; Biological Assessment submitted August 2025	March 2026
Virginia			
Virginia Department of Historic Resources ("VDHR"), Division of Review and Compliance	Consultation and clearance regarding potential impacts on pre-historic and historic resources eligible for listing on the National Register of Historic Places ("NRHP")	August 2024	March 2025
Virginia Department of Environmental Quality ("VADEQ"), Water Division	Individual Section 401 Water Quality Certification and Water Protection Permit	March 2025	December 2025
VADEQ, Water Division	Standards and Specifications for the discharge of construction stormwater	June 2025	August 2025
Virginia Department of Conservation and Recreation, Division of Natural Heritage	Consultation for state-threatened and endangered plant and insect species and other state-designated "Natural Heritage" resources	July 2024	March 2025
Virginia Department of Wildlife Resources,	Consultation for state-threatened and endangered animal and aquatic species	July 2024	August 2025

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Updates to Table 1.7-1			
Anticipated Permits and Consultations for the Amendment Project			
Agency	Permit/Approval/ Consultation ^{a/}	Anticipated Submittal/ Initiation Date	Anticipated Permit Receipt/ Completion Date
Wildlife and Environmental Services Division			
Virginia Department of Transportation ("VDOT")	Road bonds and crossing permits	[TBD] Prior to Construction	[TBD] Prior to Construction
North Carolina			
North Carolina Department of Environmental Quality ("NCDEQ"), Division of Water Resources	Individual 401 Water Quality Certification, Isolated/non-404 wetlands and water permit, and Buffer authorization	March 2025	December 2025
NCDEQ, Division of Energy, Mineral and Land Resources	General Permit NCG010000 to discharge stormwater under the National Pollutant Discharge Elimination System for Construction Activities	June 2025	December 2025
NCDEQ, Natural Heritage Program	Consultation for state-threatened and endangered species	July 2024	March 2025
North Carolina Wildlife Resources Commission	Consultation for state-threatened and endangered species	December 2024	February 2025
North Carolina Historic Preservation Office ("NC HPO")	Consultation and clearance regarding potential impacts on pre-historic and historic resources eligible for listing on the NRHP	August 2024	February 2025
North Carolina Department of Transportation ("NCDOT")	Road bonds and crossing permits	[TBD] Prior to construction	[TBD] Prior to construction
<p>Note: Updates as of Mountain Valley's Environmental Information Request response filed September 2, 2025 are identified with red text.</p> <p>^{a/} Consultations will occur continuously throughout the development of the Amendment Project.</p> <p>^{b/} The Standards & Specifications, which are periodically revised and reapproved by VADEQ, apply to the Mainline Project and the Amendment Project.</p> <p>TBD = to be determined</p>			

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
Dated August 25, 2025**

Request:

Resource Report 1 – General Project Description

Question 2

Provide a revised table 1.9-2 (Electric Service Feeds to the Amendment Project Facilities), which denotes which non-jurisdictional facilities were discussed in the FEIS/or provided for the certificated Project and would no longer be applicable for the Amendment Project.

Response:

A revised Table 1.9-2, which denotes which non-jurisdictional facilities were discussed in the FEIS (as identified in Appendix 2.F of the FEIS) or provided for the Original Certificated Project and would no longer be applicable for the Amendment Project, is presented as Comparison Table 1.9-2 in Attachment 4 of this Environmental Information Request response.

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
Dated August 25, 2025**

Request:

Resource Report 1 – General Project Description

Question 3

Provide an updated table 2-7 (Changes in Temporary and Permanent Workspaces Along the Amendment Project ROW from the Original Certificated Project ROW) which includes an actual value for rows which currently have 0.00 acre. Include a new column which specifies which type of Project facility (pipeline, ATWS, access road, interconnect, etc.) is part of each row. Also denote (via asterisk, footnote, or color coding) which rows are changes that remain within certificated footprint and which are changes that would be outside of certificated footprint (such as for a re-route).

Response:

To be consistent with the other tables and data provided as part of the Amendment Project, values of 0.00 acre were left as-is, as that is the actual value when rounded to two decimal points. An updated Table 2-7 (Changes in Temporary and Permanent Workspaces Along the Amendment Project ROW from the Original Certificated Project ROW) that specifies which type of facility and denotes changes within and outside of the Original Certificated Project footprint is provided below.

A change from temporary to permanent workspace in the Amendment Project does not necessarily indicate a permanent conversion of land use, such as would occur at aboveground facility locations. In some cases, workspace originally designated as temporary has been reclassified as part of the permanent easement, but the land will still be restored following construction. These areas are not being converted to new land uses; rather, they are being retained within the permanent ROW for operational access and maintenance. The reclassification reflects a change in designation, not a change in long-term land use impact. Those areas being permanently converted are denoted in the table below.

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
Dated August 25, 2025**

Table 2-7						
Changes in Temporary and Permanent Workspaces Along the Amendment Project ROW from the Original Certificated Project ROW						
Original Certificated Project			Amendment Project			Acreage (acres)
Start MP	End MP	Temporary or Permanent	Start MP	End MP	Temporary or Permanent	
0	0.1	ATWS (H-605 Pipeline)	0	0.1	Meter Station (Lambert Interconnect)	0.31
0	0.1	Temporary Workspace (H-605 Pipeline)	0	0.1	Meter Station (Lambert Interconnect)	0.17
0.3	0.4	Permanent Easement (H-605 Pipeline)	0.3	0.4	ATWS (H-650 Pipeline)	0.13
0.3	0.4	Permanent Easement (H-605 Pipeline)	0.3	0.4	ATWS (H-650 Pipeline)	0.30
0.3	0.4	Permanent Easement (Lambert Compressor Station)	0.3	0.4	Temporary Workspace (H-650 Pipeline)	0.05
0.3	0.4	Permanent Easement (Lambert Compressor Station)	0.3	0.4	Temporary Workspace (H-650 Pipeline)	0.05
0.1	0.2	Permanent Easement (H-605 Pipeline)	0.3	0.4	Temporary Workspace (H-650 Pipeline)	0.09
0.3	0.4	ATWS (H-605 Pipeline)	0.3	0.4	Permanent Easement (H-650 Pipeline)	0.24
0.3	0.4	Temporary Workspace (H-605 Pipeline)	0.3	0.4	Permanent Easement (H-650 Pipeline)	0.02
0.3	0.4	Temporary Workspace (H-605 Pipeline)	0.3	0.4	Permanent Easement (H-650 Pipeline)	0.00
0.3	0.4	Temporary Workspace (Lambert Compressor Station)	0.3	0.4	Permanent Easement (H-650 Pipeline)	0.04
0.3	0.4	Permanent Easement (Lambert Compressor Station)	0.3	0.4	Temporary Workspace (H-650 Pipeline)	0.01
0.3	0.4	Permanent Access Road (Lambert Compressor Station)	0.3	0.4	Temporary Workspace (H-650 Pipeline)	1.15
0.3	0.4	Facility Site (Lambert Compressor Station)	0.3	0.4	Temporary Workspace (H-650 Pipeline)	0.19
0.3	0.4	Permanent Easement (MLV 1)	0.3	0.4	Temporary Workspace (H-650 Pipeline)	0.04
0.3	0.4	Permanent Easement (MLV 1)	0.3	0.4	Temporary Workspace (H-650 Pipeline)	0.03
0.3	0.4	Permanent Access Road (Lambert Compressor Station)	0.3	0.4	Temporary Workspace (H-650 Pipeline)	0.34
0.4	0.7	Temporary Workspace (H-650 Pipeline)	0.7	1	Permanent Easement (H-650 Pipeline)	0.40
0.4	0.5	Permanent Easement (H-650 Pipeline)	0.7	0.8	Temporary Workspace (H-650 Pipeline)	0.01
0.6	0.7	Permanent Easement (H-650 Pipeline)	0.9	1	Temporary Workspace (H-650 Pipeline)	0.01
0.7	0.8	Permanent Easement (H-650 Pipeline)	1	1.1	Temporary Workspace (H-650 Pipeline)	0.01
0.7	1.1	Temporary Workspace (H-650 Pipeline)	1	1.3	Permanent Easement (H-650 Pipeline)	0.86
1	1.1	Permanent Easement (H-650 Pipeline)	1.3	1.4	Temporary Workspace (H-650 Pipeline)	0.01
10.1	10.2	Permanent Easement (H-650 Pipeline)	9.8	9.9	ATWS (H-650 Pipeline)	0.00
9.6	9.7	Permanent Easement (H-650 Pipeline)	9.9	10	Temporary Workspace (H-650 Pipeline)	0.02
9.6	9.7	ATWS (H-650 Pipeline)	9.9	10	Permanent Easement (H-650 Pipeline)	0.13

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
Dated August 25, 2025**

Table 2-7

Changes in Temporary and Permanent Workspaces Along the Amendment Project ROW from the Original Certificated Project ROW

Original Certificated Project			Amendment Project			Acreage (acres)
Start MP	End MP	Temporary or Permanent	Start MP	End MP	Temporary or Permanent	
9.6	9.7	Temporary Workspace (H-650 Pipeline)	9.9	10	Permanent Easement (H-650 Pipeline)	0.05
9.7	9.9	ATWS (H-650 Pipeline)	10.1	10.2	Permanent Easement (H-650 Pipeline)	0.34
9.9	10	Permanent Easement (H-650 Pipeline)	10.2	10.3	Temporary Workspace (H-650 Pipeline)	0.03
9.9	10	Temporary Workspace (H-650 Pipeline)	10.2	10.3	Permanent Easement (H-650 Pipeline)	0.02
12	12.2	Permanent Easement (H-650 Pipeline)	12.4	12.5	Temporary Workspace (H-650 Pipeline)	0.10
17.4	17.5 RR	Permanent Easement (H-650 Pipeline)	17.8	17.9	ATWS (H-650 Pipeline)	0.03
17.4	17.5	Permanent Easement (H-650 Pipeline)	17.8	17.9	Temporary Workspace (H-650 Pipeline)	0.00
17.4	17.5	Temporary Workspace (H-650 Pipeline)	17.8	17.9	Permanent Easement (H-650 Pipeline)	0.04
17.4	17.5	Permanent Easement (H-650 Pipeline)	17.8	17.9	Temporary Workspace (H-650 Pipeline)	0.09
17.8	17.9	Temporary Workspace (H-650 Pipeline)	18.2	18.3	Permanent Easement (H-650 Pipeline)	0.03
17.9RR	17.95R R	Permanent Easement (H-650 Pipeline)	18.3	18.4	ATWS (H-650 Pipeline)	0.02
17.9RR	17.9	Permanent Easement (H-650 Pipeline)	18.3	18.4	Temporary Workspace (H-650 Pipeline)	0.05
17.8	17.9	Permanent Easement (H-650 Pipeline)	18.3	18.4	Temporary Workspace (H-650 Pipeline)	0.00
19.3	19.4	Permanent Easement (H-650 Pipeline)	19.8	19.9	Temporary Workspace (H-650 Pipeline)	0.01
19.4	19.5	ATWS (H-650 Pipeline)	19.8	19.9	Permanent Easement (H-650 Pipeline)	0.02
19.4	19.5	Temporary Workspace (H-650 Pipeline)	19.8	19.9	Permanent Easement (H-650 Pipeline)	0.23
19.5	19.9	Temporary Workspace (H-650 Pipeline)	19.9	20.3	Permanent Easement (H-650 Pipeline)	0.95
19.5	19.6	Permanent Easement (H-650 Pipeline)	19.9	20	Temporary Workspace (H-650 Pipeline)	0.01
19.8	19.9	Permanent Easement (H-650 Pipeline)	20.2	20.3	Temporary Workspace (H-650 Pipeline)	0.02
21.8	22.1	Permanent Easement (H-650 Pipeline)	22.2	22.5	Temporary Workspace (H-650 Pipeline)	0.39
22	22.3	Permanent Easement (H-650 Pipeline)	22.4	22.8	Temporary Workspace (H-650 Pipeline)	0.40
22.3	22.5 RR	Temporary Workspace (H-650 Pipeline)	22.7	22.9	Permanent Easement (H-650 Pipeline)	0.29
22.3	22.4	Permanent Easement (H-650 Pipeline)	22.7	22.8	Temporary Workspace (H-650 Pipeline)	0.01
22.4	22.5 RR	Permanent Easement (H-650 Pipeline)	22.8	22.9	Temporary Workspace (H-650 Pipeline)	0.02
23.3	23.4 RR	Permanent Easement (H-650 Pipeline)	23.8	23.9	Temporary Workspace (H-650 Pipeline)	0.02
23.3 RR	23.4 RR	Temporary Workspace (H-650 Pipeline)	23.8	23.9	Permanent Easement (H-650 Pipeline)	0.06
24.6	24.7	Permanent Easement (H-650 Pipeline)	25.3	25.4	ATWS (H-650 Pipeline)	0.02

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
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Dated August 25, 2025**

Table 2-7						
Changes in Temporary and Permanent Workspaces Along the Amendment Project ROW from the Original Certificated Project ROW						
Original Certificated Project			Amendment Project			Acreage (acres)
Start MP	End MP	Temporary or Permanent	Start MP	End MP	Temporary or Permanent	
24.6	24.7	Permanent Easement (H-650 Pipeline)	25.3	25.4	Temporary Workspace (H-650 Pipeline)	0.01
24.6	24.9	Temporary Workspace (H-650 Pipeline)	25.3	25.6	Permanent Easement (H-650 Pipeline)	0.71
24.6	24.7	Temporary Workspace (H-650 Pipeline)	25.3	25.4	Permanent Easement (H-650 Pipeline)	0.02
24.6	24.7	Permanent Easement (H-650 Pipeline)	25.3	25.4	Temporary Workspace (H-650 Pipeline)	0.03
24.7	24.8	ATWS (H-650 Pipeline)	25.4	25.5	Permanent Easement (H-650 Pipeline)	0.00
24.8	24.9	ATWS (H-650 Pipeline)	25.5	25.6	Permanent Easement (H-650 Pipeline)	0.05
28.1RR	28.2RR	Permanent Roads (H-650 Pipeline)	28.8	28.9	ATWS (LN 3600 Interconnect Meter Station)	0.00
28.3RR	28.69 RR	Permanent Easement (H-650 Pipeline)	29	29.4	Temporary Workspace (H-650 Pipeline)	0.02
29.9	30	Permanent Easement (H-650 Pipeline)	30.6	30.7	ATWS (H-650 Pipeline)	0.02
29.9	30	ATWS (H-650 Pipeline)	30.6	30.7	Permanent Easement (H-650 Pipeline)	0.06
29.9	30	Temporary Workspace (H-650 Pipeline)	30.6	30.7	Permanent Easement (H-650 Pipeline)	0.00
30.3	30.4	ATWS (H-650 Pipeline)	31	31.2	Permanent Easement (H-650 Pipeline)	0.76
30.3	30.4	Permanent Easement (H-650 Pipeline)	31.2	31.3	ATWS (H-650 Pipeline)	0.21
30.4	30.5	Permanent Easement (T-15 Dan River)	31.2	31.3	Temporary Workspace (Dan River Interconnect #1)	0.00
30.4	30.5	Permanent Easement (T-15 Dan River)	31.2	31.3	Temporary Workspace (Dan River Interconnect #2)	0.00
30.4	30.5	Permanent Easement (T-15 Dan River)	31.2	31.3	Permanent Easement (Dan River Interconnect #1)	0.04
30.4	30.5	Temporary Workspace (T-15 Dan River)	31.2	31.3	Permanent Easement (Dan River Interconnect #2)	0.00
30.4	30.5	Permanent Easement (T-15 Dan River)	31.2	31.3	ATWS (H-650 Pipeline)	0.04
30.4	30.5	ATWS (T-15 Dan River)	31.2	31.3	Permanent Easement (Dan River Interconnect #2)	0.41
30.4	30.5	Temporary Workspace (MLV 4)	31.2	31.3	Permanent Easement (Dan River Interconnect #2)	0.06
30.4	30.5	ATWS (T-15 Dan River)	31.2	31.3	Permanent Easement (H-650 Pipeline)	0.05

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
Dated August 25, 2025**

Table 2-7						
Changes in Temporary and Permanent Workspaces Along the Amendment Project ROW from the Original Certificated Project ROW						
Original Certificated Project			Amendment Project			Acreage (acres)
Start MP	End MP	Temporary or Permanent	Start MP	End MP	Temporary or Permanent	
30.4	30.5	ATWS (T-15 Dan River)	31.2	31.3	Permanent Easement (H-650 Pipeline)	0.09
30.4	30.5	Permanent Easement (T-15 Dan River)	31.3	31.4	Temporary Workspace (H-650 Pipeline)	0.04
30.5	30.6	Permanent Easement (H-650 Pipeline)	31.3	31.4	ATWS (H-650 Pipeline)	0.03
30.4	30.5	Temporary Workspace (Dan River Interconnect)	31.3	31.4	Permanent Easement (H-650 Pipeline)	0.05

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
Dated August 25, 2025**

Request:

Resource Report 1 – General Project Description

Question 4

Provide a new table (similar to table 2-7) which provides each area which would be converted from temporary to permanent workspace by land use type (and acreage) and vegetation type (and acreage).

Response:

New Table B, which provides each area that would be converted from temporary to permanent workspace by land use type, vegetation type, and associated acreages, is provided below. For each workspace line item, the acreage by land use is shown for both the Original Certificated Project and the Amendment Project, with a total acreage for each individual workspace summarized in the final column. Changes to land use acreages reflect the incorporation of updated survey data as well as modifications in land use conditions since issuance of the February 2020 FEIS.

A change from temporary to permanent workspace in the Amendment Project does not necessarily indicate a permanent conversion of land use, as described in Mountain Valley's response to the previous question in this Environmental Information Request.

Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000

Responses to FERC Office of Energy Projects Environmental Information Request 4
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Table B								
Changes in Temporary and Permanent Workspaces Along the Amendment Project ROW from the Original Certificated Project ROW								
Original Certificated Project				Amendment Project				Acreage (acres)
Start MP	End MP	Temporary or Permanent	Land Use (acres) <u>a/</u>	Start MP	End MP	Temporary or Permanent	Land Use (acres) <u>a/</u>	
0	0.1	ATWS (H-605 Pipeline)	FW-E (0.31)	0	0.1	Meter Station (Lambert Interconnect)	FW-M (0.31)	0.31
0	0.1	Temporary Workspace (H-605 Pipeline)	FW-E (0.17)	0	0.1	Meter Station (Lambert Interconnect)	FW-M (0.17)	0.17
0.3	0.4	ATWS (H-605 Pipeline)	AG (0.20); FW-D (0.000002); OL (0.04)	0.3	0.4	Permanent Easement (H-650 Pipeline)	FW-M (0.03); OL (0.21)	0.24
0.3	0.4	Temporary Workspace (H-605 Pipeline)	AG (0.02)	0.3	0.4	Permanent Easement (H-650 Pipeline)	OL (0.02)	0.02
0.3	0.4	Temporary Workspace (H-605 Pipeline)	OL (0.0002)	0.3	0.4	Permanent Easement (H-650 Pipeline)	OL (0.0002)	0.00
0.3	0.4	Temporary Workspace (Lambert Compressor Station)	FW-D (0.01); OL (0.03)	0.3	0.4	Permanent Easement (H-650 Pipeline)	FW-M (0.04)	0.04
0.4	0.7	Temporary Workspace (H-650 Pipeline)	OW (0.003); WL (0.04); FW-D (0.14); OL (0.22)	0.7	1	Permanent Easement (H-650 Pipeline)	OW (0.001); FW-M (0.14); OL (0.24); WL (0.02)	0.40
0.7	1.1	Temporary Workspace (H-650 Pipeline)	AG (0.10); CI (0.01); WL-F (0.001); SC (0.19); FW-D (0.07); OL (0.49)	1	1.3	Permanent Easement (H-650 Pipeline)	AG (0.22); CI (0.02); FW-D (0.08); FW-M (0.16); OL (0.39); WL (0.03)	0.86
9.6	9.7	ATWS (H-650 Pipeline)	FW-M (0.13)	9.9	10	Permanent Easement (H-650 Pipeline)	FW-D (0.13)	0.13
9.6	9.7	Temporary Workspace (H-650 Pipeline)	FW-M (0.05)	9.9	10	Permanent Easement (H-650 Pipeline)	FW-D (0.05)	0.05
9.7	9.9	ATWS (H-650 Pipeline)	AG (0.32); FW-M (0.00006); OL (0.02)	10.1	10.2	Permanent Easement (H-650 Pipeline)	AG (0.34)	0.34
9.9	10	Temporary Workspace (H-650 Pipeline)	WL-F (0.003); OW (0.0001); FW-D (0.02)	10.2	10.3	Permanent Easement (H-650 Pipeline)	OW (0.005); FW-D (0.01); WL (0.01)	0.02
17.4	17.5	Temporary Workspace (H-650 Pipeline)	OL (0.04)	17.8	17.9	Permanent Easement (H-650 Pipeline)	OL (0.04)	0.04
17.8	17.9	Temporary Workspace (H-650 Pipeline)	FW-D (0.02); OL (0.001)	18.2	18.3	Permanent Easement (H-650 Pipeline)	FW-D (0.03)	0.03
19.4	19.5	ATWS (H-650 Pipeline)	AG (0.0.1); FW-M (0.02)	19.8	19.9	Permanent Easement (H-650 Pipeline)	FW-E (0.02)	0.02
19.4	19.5	Temporary Workspace (H-650 Pipeline)	AG (0.10); OW (0.001); FW-D (0.003); FW-M (0.12	19.8	19.9	Permanent Easement (H-650 Pipeline)	OW (0.0008); FW-E (0.21); OL (0.02)	0.23
19.5	19.9	Temporary Workspace (H-650 Pipeline)	WL-F (0.0001); OW (0.001); FW-D (0.48); FW-D (0.10); OL (0.37)	19.9	20.3	Permanent Easement (H-650 Pipeline)	OW (0.001) FW-M (0.76); OL (0.18); WL (0.003)	0.95
22.3	22.5 RR	Temporary Workspace (H-650 Pipeline)	FW-M (0.29); OL (0.005)	22.7	22.9	Permanent Easement (H-650 Pipeline)	FW-M (0.29)	0.29
23.3 RR	23.4 RR	Temporary Workspace (H-650 Pipeline)	FW-E (0.06)	23.8	23.9	Permanent Easement (H-650 Pipeline)	FW-M (0.06)	0.06
24.6	24.9	Temporary Workspace (H-650 Pipeline)	OW (0.002); FW-D (0.40); FW-E (0.10); FW-M (0.09); OL (0.11)	25.3	25.6	Permanent Easement (H-650 Pipeline)	CI (0.17); OW (0.001); FW-E (0.51); WL (0.03)	0.71
24.6	24.7	Temporary Workspace (H-650 Pipeline)	FW-E (0.01); OL (0.01)	25.3	25.4	Permanent Easement (H-650 Pipeline)	CI (0.01); WL (0.01)	0.02
24.7	24.8	ATWS (H-650 Pipeline)	FW-D (0.0005)	25.4	25.5	Permanent Easement (H-650 Pipeline)	FW-E (0.0005)	0.00
24.8	24.9	ATWS (H-650 Pipeline)	FW-D (0.05)	25.5	25.6	Permanent Easement (H-650 Pipeline)	FW-E (0.05)	0.05
29.9	30	ATWS (H-650 Pipeline)	AG (0.06)	30.6	30.7	Permanent Easement (H-650 Pipeline)	AG (0.06)	0.06
29.9	30	Temporary Workspace (H-650 Pipeline)	AG (0.003)	30.6	30.7	Permanent Easement (H-650 Pipeline)	AG (0.003)	0.003
30.3	30.4	ATWS (H-650 Pipeline)	AG (0.75); WL-F (0.01)	31	31.2	Permanent Easement (H-650 Pipeline)	AG (0.72); FW-D (0.001); WL (0.04)	0.76
30.4	30.5	Temporary Workspace (T-15 Dan River)	CI (0.00008)	31.2	31.3	Permanent Easement (Dan River Interconnect #2)	CI (0.00008)	0.00
30.4	30.5	ATWS (T-15 Dan River)	OL (0.41)	31.2	31.3	Permanent Easement (Dan River Interconnect #2)	OL (0.41)	0.41
30.4	30.5	ATWS (T-15 Dan River)	OL (0.05)	31.2	31.3	Permanent Easement (H-650 Pipeline)	OL (0.05)	0.05
30.4	30.5	ATWS (T-15 Dan River)	CI (0.01); WL-F (0.08); OL (0.01)	31.2	31.3	Permanent Easement (H-650 Pipeline)	CI (0.03); FW-D (0.002); WL (0.06)	0.09
30.4	30.5	Temporary Workspace (T-15 Dan River)	CI (0.001); WL-F (0.02); FW-D (0.0003); OL (0.02)	31.3	31.4	Permanent Easement (H-650 Pipeline)	CI (0.02); FW-D (0.001); OL (0.02); WL (0.004)	0.05
<u>a/</u> AG = Agricultural; CI = Commercial/Industrial; FW-D = Upland Forest/Woodland (Deciduous); FW-E = Upland Forest/Woodland (Evergreen); FW-M = Upland Forest/Woodland (Mixed); OL = Upland Open Land; RD = Residential; SC = Silviculture; WL = Wetland; WL-F = Wetland (Forested).								

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
Dated August 25, 2025**

Request:

Resource Report 2 – Water Use and Quality

Question 1

Table 2.2-1 indicates 10 private wells (domestic and groundwater testing uses) would be located within workspaces for the Amendment Project. In addition, the FEIS included a condition which required Mountain Valley to provide the locations of all private water wells and springs within 150 feet of workspaces (including the well/spring's status, use, and distance from workspaces) and proposed measures to minimize or avoid impacts on all wells/springs. Clarify if Mountain Valley has provided the location, use, and distance information for all wells/springs within 150 feet of Amendment Project workspaces. Additionally, provide proposed measures to minimize or avoid impacts on all private wells/springs within Amendment Project workspaces and specifically the 10 private wells located within Amendment Project workspaces.

Response:

Table 2.2-1 in Attachment G-3 of Mountain Valley's Environmental Information Request response filed on August 8, 2025 presents a list of all wells identified within 150 feet of the Amendment Project workspaces. Included within this table is the location of the well (by milepost), the use of the well, and the distance of the well to the construction workspace. As footnoted in this table, no springs have been identified within 150 feet of the Amendment Project workspaces.

Consistent with the February 2020 FEIS, Mountain Valley will offer to conduct pre-construction and post-construction water quality testing for all water supply wells located within 150 feet of Amendment Project workspaces, with post-construction testing being conducted if a pre-construction water quality test was performed. Detailed information for identifying and assessing water supplies within the vicinity of the Amendment Project is contained within *Mountain Valley's Water Resources Identification and Testing Plan*, which has been filed within Mountain Valley's February 3, 2025 Amendment Application and in Attachment 1-4 of Mountain Valley's Environmental Information Request response filed July 15, 2025.

Mountain Valley will implement enhanced BMPS around private wells, including the use of double- or triple-stacked compost filter sock, to provide added protection during

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construction. If blasting is planned in proximity to a private well, the Blasting Engineer will take the well location into account and adjust blasting parameters as appropriate to minimize potential impacts.

Finally, as noted in the FEIS, no karst features were encountered or mapped in the vicinity of the Amendment Project.

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Request:

Resource Report 2 – Water Use and Quality

Question 2

Table 2.2-2 (Documented Potential Contaminated Groundwater Sites within 0.5 mile of the Original Certificated Project and Amendment Project Construction Right-of-Way) includes facility “Mountain Valley Pipeline LLC South Electric Tap (Construction NPDES)” 0.1 mile from the construction right-of-way. Provide additional information regarding this site.

Response:

The facility located at MP 0 is identified as “Mountain Valley Pipeline LLC South Electric Tap.” This facility is owned by Mountain Valley Pipeline, LLC and consists of an electric tap associated with the Mountain Valley Pipeline Mainline.

According to the U.S. Environmental Protection Agency’s Drinking Water Mapping Application to Protect Source Waters (“DWMAPS”), which was referenced in developing Table 2.2-2 of Mountain Valley’s February 3, 2025 Amendment Application, the site is classified as “ICIS-NPDES NON-MAJOR.” This designation indicates a smaller-scale National Pollutant Discharge Elimination System (“NPDES”) discharge facility that is tracked in EPA’s Integrated Compliance Information System (“ICIS”) and displayed in DWMAPS for source water protection and compliance monitoring purposes.

As of March 24, 2022, the site held an active NPDES permit in the form of a Virginia Construction Stormwater General Permit (“CGP”) authorizing stormwater discharges. Based on the statewide CGP database as of March 24, 2022, Permit No. VAR10M610 was active for Mecklenburg Electric Cooperative under the Construction Activity Name “*Mountain Valley Pipeline LLC South Electric Tap Easement – Erosion & Sediment Control Plan*” at 945 Transco Road, Chatham, Virginia. No more recent or updated permit information is available for this site.

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Request:

Resource Report 2 – Water Use and Quality

Question 3

As previously requested in EIR 2 (RR 4 No. 2), provide the requested information for dust control (final list of water sources to be used for...dust control...), including intake location, waterbody name, withdrawal rate and method, and measures to minimize entrainment of aquatic species. As written concurrence from the U.S. Fish and Wildlife Service (FWS) for water withdrawals from the Dan River (currently proposed for hydrostatic testing and horizontal directional drill [HDD] operations) has not yet been filed, clarify why the Dan River is proposed to be the primary source of water, when use of municipal sources could avoid potential impacts on listed aquatic species.

Response:

Mountain Valley proposes to use water from the Dan River and municipal sources for dust control during construction. It is estimated that approximately 30,000 gallons of water per day will be needed during dry weather conditions for this purpose. A table detailing the anticipated water withdrawal for dust suppression is provided below.

One challenge with using municipal water is the distance to the nearest hydrant, which is located approximately 3.5 miles from the Amendment Project area. This could result in up to 375–400 water truck trips to and from the site, raising logistical and operational concerns. Mountain Valley is currently in discussions with the Dan River Water Company to evaluate the feasibility of using municipal water and to address the logistics of accessing and transporting the required volume.

If dust control water is withdrawn from the Dan River, Mountain Valley will implement a suite of avoidance and minimization measures to avoid adverse impacts to the river and aquatic species when constructing and operating this water withdrawal site, including location-specific erosion and sediment control measures, use of a temporary floating structure (rather than a fixed structure), adherence to time-of-year restrictions to avoid impacting aquatic species, use of holding tanks to facilitate withdrawing water over a longer period, maintaining minimum pass-by flows equal to at least 90 percent of instantaneous riverflow, and a through-screen approach velocity less than 0.25 foot per

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second with a 1.0-millimeter mesh screen (which will avoid the risk of impingement, entrainment, and crushing of fish host species).

The location of the water intake at the Dan River is planned downstream of the Amendment Project's crossing location in an area of suitable water depth (i.e., greater than five feet), where the floating intake will be suspended well above functional substrates. No permanent or fixed instream infrastructure will be installed. A very limited amount of understory riparian vegetation may need to be removed to facilitate deployment of the hose and intake, but no loss of riparian canopy will occur. Upon completion of the hydrostatic testing, test water will not be returned to the Dan River but rather released in a well-vegetated upland location in accordance with state regulatory procedures.

Accordingly, due to the implementation of avoidance and minimization measures and the temporary nature of the withdrawal, the water withdrawal is not likely to adversely affect listed aquatic species.

Mountain Valley analyzed the use of the Dan River in its Biological Assessment. See Biological Assessment at Sections 2.4.1.6, 2.5.1, 2.5.3, 5.2.2.1.1, 5.2.2.2.1, and 5.2.3.1.1. That same information and analysis will be included in the same locations in the forthcoming updated Biological Assessment.

Water Sources for Dust Suppression for the Amendment Project					
Uptake location MP	Required Water (gallons)	Proposed Water Source			Withdrawal Rate and Method
		MP	Water Source	Watershed	
30.8	30,000/day (as needed)	30.4	Dan River or Municipal Sources	Dan River Basin	Withdraws will be conducted to maintain minimum pass-by flows equal to at least 90 percent of instantaneous riverflow, and achieve a through-screen approach velocity less than 0.25 foot per second with a maximum capacity of 2,000 gallons per minute or approximately 4.5 cubic feet per second.

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Request:

Resource Report 2 – Water Use and Quality

Question 4

Regarding RR 2 No. 9, provide new tables (not revised tables) which include all waterbody crossings for the Amendment Project. For each waterbody crossing, denote (via asterisk, footnote, or color coding) which waterbodies would be new crossings due to route changes (located within footprint outside of the certificated Project footprint), which have changed due to survey (i.e., boundary changes since certification), and which would remain as certificated (no changes to the resource boundary, no changes to crossing location, and these crossings would remain within certificated workspace). Provide a similar new table for wetlands. See additional comment(s) below regarding tables provided in G-1 and G-3.

Response:

Mountain Valley has provided tables for waterbodies and wetlands crossed by the Amendment Project in Attachment 2 of this Environmental Information Request response. These features are reflective of survey data collected in 2024 and 2025, as well as coordination with the USACE, VADEQ, NCDEQ, and discussions with Transco. The requested crossing measures associated with each feature are also included in the tables.

While the data has been refreshed to reflect current site conditions and recent updates to public datasets, the pipeline construction crossing procedures and minimization measures outlined in the February 2020 FEIS remain applicable and appropriate for the Amendment Project. These measures continue to represent best practices for reducing environmental impacts and should be considered consistent with the Original Certificated Project commitments.

For features crossed using trenchless methods, Mountain Valley calculated land use and wetland disturbances based on the full 75-foot right-of-way as shown on the alignment sheets and tables; however, Mountain Valley only intends to clear a 30-foot travel lane within this workspace for both construction and long-term operation of the pipeline. This approach was implemented for contingency planning purposes, ensuring adequate space is available if unforeseen conditions require adjustments during construction. The pipeline generally follows the centerline of the right-of-way, but may be shifted slightly

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based on site-specific conditions during construction. Minor shifts of this nature would require further regulatory approvals; therefore, Mountain Valley has conservatively included impacts to these features for the entirety of the 75-foot right-of-way such that additional regulatory approvals would not need to be obtained during active construction.

While the full 75-foot right-of-way is used for impact calculations to maintain consistency and account for potential worst-case scenarios, the practical disturbance is expected to be significantly less due to the limited clearing associated with trenchless construction methods like HDD and conventional boring.

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Request:

Resource Report 2 – Water Use and Quality

Question 5

Mountain Valley’s response for RR 2 No. 7 states “site-specific plans detailing the enhanced erosion control measures and maintenance requirements for each location where the Amendment Project will parallel and remove vegetation within 15 feet of a waterbody are included in Attachment 2-1 of this EIR response.” Attachment 2-1 was not filed on August 8, 2025. Provide the attachment.

Response:

Attachment 2-1 was inadvertently omitted from Mountain Valley’s Environmental Information Request response filed August 8, 2025 and is included as Attachment 5 to this Environmental Information Request response.

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Resource Report 2 – Water Use and Quality

Question 6

RR 2 No. 8 requested Mountain Valley “describe and update the permitting process and associated actions resulting from permanent impacts in the 100-year Flood Zone.” Mountain Valley’s July 15, 2025 response stated, “Mountain Valley is coordinating with local floodplain administrators regarding the Amendment Project and will provide an update to the docket once available.” As the Amendment Project would result in 1.15 acres of permanent impact within the 100-year flood zone from construction of the Dan River Interconnect #1 and Dan River Interconnect #2, provide an update regarding Mountain Valley’s consultations with floodplain administrators. In addition, provide floodplain storage capacity loss due to proposed aboveground facilities.

Response:

Mountain Valley continues to coordinate with both Pittsylvania County and Rockingham County while preparing the Amendment Project’s floodplain application for Virginia and North Carolina, respectively. Mountain Valley expects to complete the plans in the fourth quarter of 2025 or early in the first quarter of 2026. Technical information, such as storage capacity loss, will be provided once available as consultation with each county progresses.

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Request:

Resource Report 2 – Water Use and Quality

Question 7

Provide two tables listing only waterbodies and wetlands (separately) for which Mountain Valley is requesting a crossing method change from the certificated Project.

Response:

Mountain Valley has provided tables for waterbodies and wetlands crossed by the Amendment Project in Attachment 2 of this Environmental Information Request response. These features include the incorporation of updated survey data as collected in 2024 and 2025, as well as coordination with the USACE, VADEQ, NCDEQ, and discussions with Transco. The requested crossing methods associated with each feature are also included in the tables.

While the data has been refreshed to reflect current site conditions and recent updates to public datasets, the pipeline construction crossing procedures and minimization measures outlined in the February 2020 FEIS remain applicable and appropriate for the Amendment Project. These measures continue to represent best practices for reducing environmental impacts and should be considered consistent with the original project commitments.

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Request:

Resource Report 2 – Water Use and Quality

Question 8

Clarify what erosion control measures would be implemented at the stormwater detention pond (Feature OW-A001) located within contractor yard CY-001.

Response:

Mountain Valley intends to install silt fencing along the edge of feature OW-A-001 and filter bags. Should alternative or additional measures be needed, they will comply with the Amendment Project's Standards & Specifications and the Virginia Stormwater Management Handbook. Additionally, Mountain Valley does not anticipate that ground disturbance will be required near or adjacent to this feature.

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Request:

Resource Report 2 – Water Use and Quality

Question 9

Address the apparent discrepancies between table 2.4-1 and appendix 2-B provided in G-1. Table 2.4-1 in G-1 (Summary of Wetlands Crossed by the Amendment Project Outside the Original Certificated Project Footprint) reports the Amendment Project total crossing length as 547.58 feet and construction impacts as 1.10 acres. However, appendix 2-B in G-1 (Wetlands Crossed by the Amendment Project Outside the Original Certificated Project Footprint) presents a total crossing length for the Amendment Project of 855.28 feet and crossing distance of 1.13 acres of construction impacts.

Response:

Table 2.4-1 (Summary of Wetlands Crossed by the Amendment Project Outside the Original Certificated Project Footprint) in Attachment G-1 is reflective of the wetlands crossed by the Amendment Project *pipeline* outside of the Original Certificated Project footprint. The number, 547.58 feet, correlates to that length. Other Amendment Project components (e.g., access roads) cross wetlands outside of the Original Certificated Project, which equates to the total length of wetlands crossed by all Amendment Project components located outside of the Original Certificated Project of 855.28 feet as presented in Appendix 2-B in Attachment G-1 of Mountain Valley's Environmental Information Request response filed August 8, 2025.

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Request:

Resource Report 3 – Fish, Wildlife, and Vegetation

Question 1

In Mountain Valley’s Migratory Bird Conservation Plan, Mountain Valley lists 12 migratory bird species of concern (MBSC). This list does not include Acadian flycatcher, American kestrel, barn owl, Louisiana waterthrush, willow flycatcher, and yellow-throated warbler, which were included as MBSC in section 4.6.3.1 of the FEIS. Provide an explanation for why these species would no longer be considered MBSC for the Amendment Project.

Response:

On August 6, 2024, Mountain Valley obtained an official Information for Planning and Consultation (“IPaC”) resource list, which was used to screen for species of conservation concern associated with populations in the Amendment Project area (USFWS 2024b; see Resource Report 1, Appendix 1-I). The IPaC resource list identified 12 Birds of Conservation Concern (“BCC”) with the potential to occur in the Amendment Project area, all of which are identified as BCC in the Piedmont Bird Conservation Region (BCR 29). The August 6, 2024 IPaC list did not include Acadian flycatcher, American kestrel, barn owl, Louisiana waterthrush, willow flycatcher, and yellow-throated warbler. In addition, the Virginia Department of Conservation and Recreation (“VDCR”) Natural Heritage Inventory and the Virginia Department of Wildlife Resources (“VDWR”) Virginia Fish and Wildlife Information Service were accessed in 2024, and no avian species were identified that were not already represented via the IPaC. Likewise, the North Carolina Natural Heritage Program (“NCNHP”) database was queried in 2024, and no avian species were identified in the data provided by NCNHP.

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Request:

Resource Report 3 – Fish, Wildlife, and Vegetation

Question 2

Provide information regarding the Project's potential impacts on species proposed for federal listing that could occur in the Amendment Project area to justify that the Amendment Project would not be likely to jeopardize the continued existence of proposed species.

Response:

As indicated in the Amendment Project Biological Assessment, species proposed for federal listing and proposed critical habitat will be addressed in the forthcoming conferencing analysis that Mountain Valley is submitting under ESA Section 7(a)(4). Mountain Valley anticipates that it will file the conferencing analysis with the Commission in the fourth quarter 2025.

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Request:

Resource Report 7 – Soils

Question 1

Address the apparent discrepancies between tables 7.3-1 and 7.2-1 (attachment G-1). Table 7.2-1 reports Prime Farmland or Farmland of Statewide Importance (combined) as 21.92 acres however, table 7.3-1 indicates 21.92 acres of prime farmland and 17.80 acres of Farmland of Statewide Importance. Resolve the apparent discrepancy.

Response:

The values in New Table 7.2-1 (Summary of Soil Characteristics and Limitations for the Amendment Project Outside the Original Certificated Project Footprint) in Attachment G-1 of Mountain Valley's Environmental Information Request response filed August 8, 2025 for 'Prime Farmland or Farmland of Statewide Importance' were incorrect and only identified areas of prime farmland. Additionally, 0.06 acre of access road was inadvertently left off of New Table 7.3-1 in Attachment G-1 of Mountain Valley's Environmental Information Request filed August 8, 2025.

These values have been corrected accordingly to reflect the total of both Prime Farmland (21.92 acres) and Farmland of Statewide Importance (17.86 acres), for a total of 39.78 acres. These values are now reflected in the updated New Table 7.2-1 and New Table 7.3-1 in Attachment 3 of this Environmental Information Request response.

Relevant revisions were also made to Comparison and Updates to Table 7.2-1 (previously filed as Comparison Table 7.2-1 in Attachment G-3 of Mountain Valley's Environmental Information Request response filed August 8, 2025) in Attachment 4 of this Environmental Information Request response. Updates are denoted in red text. No revisions were required for Comparison and Updates to Table 7.3-1 (previously filed in Attachment G-3 of Mountain Valley's Environmental Information Request response filed August 8, 2025).

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Request:

Resource Report 8 – Land Use, Recreation, and Aesthetics

Question 1

Revise table 8.2-2 in attachment G-1 (and as applicable in the same table in attachment G-3) to address apparent data or mathematical errors within this table. For example (but not limited to), the total number of acres during construction for contractor yards in Pittsylvania County is listed as 7.70 acres of commercial / industrial but the total is listed as 0.0 acre. The table lists 0.34 acre of upland forest and 3.78 acres of commercial/industrial (which totals 4.12 acres) for contractor yards in Rockingham County; however, the overall total is listed as 13.33 acres. The total number of acres impacted during construction for all contractor yards is listed as 11.83 acres but the contractor yards total only for Rockingham County is listed as 13.33 acres.

Response:

The values in New Table 8.2-2 have been corrected, and the updated table is provided in the updated New Table 8.2-2 in Attachment 3 of this Environmental Information Request response. These changes were already incorporated within Table 8.2-2 in Attachment G-3 (Land Use Acreage Affected by the Construction and Operation of the Original Certificated Project and Amendment Project); therefore, no revisions to this table were required.

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Request:

Resource Report 8 – Land Use, Recreation, and Aesthetics

Question 2

Address apparent discrepancies between table 8.4-1 which appear in both attachments G-1 and G-3, such as (but not limited to) for the temporary access road that would cross the Virginia Outdoors Foundation parcel, where attachment G-1 reports less than 0.01 acre during construction and attachment G-3 reports 0.7 acre during construction. In addition, table 8.4-1 (in G-3) includes several “NAs” for the FEIS portion of the table for the Virginia Outdoors Foundation parcel.

Response:

As presented, there are no discrepancies in the data. The acreage provided in New Table 8.4-1 (Federal and State Recreational and Special Interest Areas Crossed by or Located within 0.25 mile of the Amendment Project Outside the Original Certificated Project Footprint) in Attachment G-1 (<0.01 acre) is the amount of the portion of the temporary access road within the Virginia Outdoors Foundation parcel that is *outside the Original Certificated Project footprint*, as indicated in the title of the table.

The acreage provided in Comparison and Updates to Table 8.4-1 in Attachment G-3 (0.7 acre) is the overall acreage of the access road within the Virginia Outdoors Foundation parcel. This is consistent with other values (e.g., the Berry Hill Industrial Park) where acreages in New Table 8.4-1 (Attachment G-1 of Mountain Valley’s Environmental Information Request response filed August 8, 2025) are less than those presented in Comparison and Updates to Table 8.4-1 (Attachment G-3 of Mountain Valley’s Environmental Information Request response filed August 8, 2025) due to a portion of the area not being within the Original Certificated Project footprint.

The values reported as “NA” for the FEIS portion of the Comparison and Updates to Table 8.4-1 in Attachment G-3 for the Virginia Outdoors Foundation parcel are consistent to those presented in the FEIS and the revised Table 8.4-1 from Mountain Valley’s Supplement No. 5 to the Original Certificated Project application (Accession No. 20191023-5022, both of which were referenced when developing Attachment G-3 of Mountain Valley’s Environmental Information Request response filed August 8, 2025).

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Request:

Resource Report 9 – Air and Noise Quality

Question 1

In its August 8, 2025 response, Mountain Valley provided a “summary table (new table 9-4) of preliminary NSAs for new bore locations (i.e., new from those discussed in the Final Environmental Impact Statement [FEIS]).” Clarify if Mountain Valley is proposing 24-hour conventional boring at any of these locations. If 24-hour conventional boring is proposed, provide noise surveys for each location. Clarify the following regarding table 9-4:

- a. waterbody S-A003 is listed as “workspace only” in appendix 2-A. Resolve the discrepancy; and
- b. if waterbodies S-A0038 Braid 1, S-B030, S-B024, S-B034, and S-B035 should be included in the table.

Response:

- a. Waterbody S-A003 is located within the construction workspace and is adjacent to, but is not crossed by, the pipeline centerline. Because of its proximity to the conventional bore of S-A002, this waterbody will be encompassed as part of the conventional bore for Waterbody S-A002.
- b. Waterbodies S-A0039 Braid 1, S-B030, S-B024, S-B034, and S-B035 were initially left off Table 9-4 as they are part of existing crossings (multiple waterbodies and/or wetlands may be spanned by a single bore crossing). A new Table 9-4 is presented below. The features identified in part b of this Environmental Information Request have been added in **bold** text. All data in the table has been updated as of the completion of the noise studies (see Attachment 1 of this Environmental Information Request response).

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Updated Table 9-4									
NSAs Identified Near Conventional Bore Locations									
Waterbody ID	Approx. MP	Crossing Name	Crossing Method	NSA	Description	Direction to NSA from Crossing	Direction	Coordinates	
S-A006	0.4	Trib. to Cherrystone Creek	Conventional bore	NSA 1	Residence	2,625	W	36.823382°	-79.352580°
				NSA 2	Residence	2,750	SW	36.819067°	-79.348861°
S-A002 S-A003	0.8	Trib. to Little Cherrystone Creek	Conventional bore	NSA 1	Residence	1,210	NW	36.823382°	-79.352580°
				NSA 2	Residence	885	S	36.819067°	-79.348861°
S-A008	2	Cherrystone Creek	Conventional bore	NSA 1	Residence	1,905	E	36.806711°	-79.356816°
S-A015	4.3	Trib. to White Oak Creek	Conventional bore	NSA 1	Residence	1,310	N	36.787061°	-79.387090°
				NSA 2	Residence	665	N	36.784730°	-79.390030°
				NSA 3	Residence	1,120	W	36.783394°	-79.392154°
				NSA 4	Residence	1,520	W	36.781358°	-79.392633°
				NSA 5	Residence	1,790	S	36.778778°	-79.389181°
S-A020	5.3	Banister River	Conventional bore	NSA 1	Residence	2,275	E	36.773478°	-79.391834°
S-A039 S-A039-Braid1	11.5	Trib. to Sandy Creek	Conventional bore	NSA 1	Residence	2,220	NE	36.711225°	-79.463436°
				NSA 2	Residence	1,835	E	36.707758°	-79.461556°
				NSA 3	Residence	1,930	SE	36.701922°	-79.463325°
				NSA 4	Residence	2,250	NE	36.711969°	-79.465039°
S-A051	16.1	Trib. to Silver Creek	Conventional bore	NSA 1	Residence	1,175	SSW	36.654567°	-79.519172°
				NSA 2	Residence	1,950	WSW	36.656904°	-79.517256°
				NSA 3	Residence	2,215	WNW	36.652392°	-79.519756°
				NSA 4	Residence	1,910	NNW	36.662145°	-79.514411°
S-A058	17.4	Trib. to Lower Sandy River	Conventional Bore	NSA 1	Residence	615	NNW	36.643112°	-79.530437°
				NSA 2	Residence	680	N	36.641684°	-79.528434°
				NSA 3	Residence	1,660	ENE	36.642956°	-79.523266°
				NSA 4	Residence	1,905	ESE	36.642501°	-79.526275°
				NSA 5	Residence	1,950	S	36.636687°	-79.527834°
S-B043	21.4	Trib. to Trotters Creek	Conventional bore	NSA 1	Residence	1,750	NE	36.602720°	-79.573611°
				NSA 2	Residence	715	SE	36.597444°	-79.576067°
				NSA 3	Residence	1,530	S	36.594564°	-79.573328°

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Updated Table 9-4									
NSAs Identified Near Conventional Bore Locations									
Waterbody ID	Approx. MP	Crossing Name	Crossing Method	NSA	Description	Direction to NSA from Crossing	Direction	Coordinates	
S-B032	22.5	Trib. to Trotters Creek	No longer a conventional bore; study was completed prior to crossing methods being finalized in consultation with VADEQ, USACE, and discussions with Transco Will not be further analyzed for noise effects.	NSA 1	Residence	215	E	36.587154°	-79.585856°
				NSA 2	Residence	355	WNW	36.587952°	-79.587185°
S-B030 S-B031	24	Trib. to Dan River	Conventional Bore	NSA 1	Church	1,290	WSW	36.571798°	-79.604579°
				NSA 2	Residence	1,905	W	36.572610°	-79.611364°
S-B024 S-B025	24.4	Trib. to Dan River	Conventional bore	NSA 1	Church	1,080	NE	36.571798°	-79.604579°
				NSA 2	Residence	1,520	E	36.571905°	-79.612707°
				NSA 3	Residence	920	SW	36.566108°	-79.615794°
S-B022	24.6	Trib. to Trotters Creek	Conventional bore	NSA 1	Residence	1,220	W	36.565594°	-79.615866°
				NSA 2	Residence	1,615	NW	36.571459°	-79.613586°
				NSA 3	Church	1,720	N	36.571798°	-79.604579°
S-B020	26.5	Trib. to Trotters Creek	Conventional bore	NSA 1	Residence	2,015	S	36.539336°	-79.627839°
N/A	26.9	State Road 1745 / Buffalo Road	Conventional bore	NSA 1	Residence	1,955	E	36.539336°	-79.627839°
				NSA 2	Residence	1,300	S	36.536433°	-79.634653°
N/A	27.2	State Road 770 / State Hwy 770	Conventional bore	NSA 1	Residence	830	E	36.536433°	-79.634653°
				NSA 2	Residence	2,065	WSW	36.532256°	-79.642580°
S-B036	28	Trib. to Cascade Creek	Conventional bore	NSA 1	Residence	1,905	NE	36.532256°	-79.642580°
S-B034	28.2	Cascade Creek	Conventional Bore	No NSAs within 1/2 mile					
S-B035	28.2	Dry Creek	Conventional Bore	No NSAs within 1/2 mile					
Notes: Waterbodies S-A0039 Braid 1, S-B030, S-B024, S-B034, and S-B035 were initially left off Table 9-4 as they are part of existing crossings (multiple waterbodies and/or wetlands may be spanned by a single bore crossing). They have been added to the table and are denoted in bold text. New bore locations									

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Updated Table 9-4								
NSAs Identified Near Conventional Bore Locations								
Waterbody ID	Approx. MP	Crossing Name	Crossing Method	NSA	Description	Direction to NSA from Crossing	Direction	Coordinates
from the previous iteration of this table (from Mountain Valley's Environmental Information Request response filed on August 8, 2025) are denoted in red text. All data in the table has been updated as of the completion of the noise studies (see Attachment 1 of this Environmental Information Request response).								

Respondent: James Sabol
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**Mountain Valley Pipeline, LLC
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Request:

Resource Report 10 – Alternatives

Question 1

Clarify whether the tables and figures provided for the route variation from MP 19.8 to MP 20.3 included the MP 19.9 Variation (from RR 10). If not, provide updated tables and figures which combine these route variations into one route variation. In addition, provide a narrative (similar to those in RR 10) for this new route variation, which encompasses the MP 19.9 Variation and the new MP 19.8 to MP 20.3 variation filed on July 15, 2025 (due to the Eden Loop Project). Also indicate whether any unwilling landowners are associated with this variation and if so, how many. Confirm that all landowners associated with all route variations are on the mailing list, if not, provide updates to the mailing list.

Response:

The tables and figures provided for the MP 19.8 to MP 20.3 route variation (filed July 15, 2025, due to the changes as a result of the Transco Eden Loop Project) do not include the MP 19.9 variation from RR 10 as filed as part of Mountain Valley's February 3, 2025 Amendment Application. These two variations are separated by approximately 316.8 feet as MP 9.9 Variation starts at MP 19.79 to MP 19.86 and the route variation from MP 19.8 to MP 20.3 starts at MP 19.92 to MP 20.27.

Given this gap, it is appropriate to maintain these variations as distinct route variations for clarity and consistency in documentation. Additionally, the MP 19.9 variation was developed independently and is unrelated to the Eden Loop Project, whereas the MP 19.8 to MP 20.3 variation was specifically filed in response to Eden Loop considerations.

At this time, no unwilling landowners are associated with either of these route variations. All landowners affected by both variations are confirmed to be on the current project mailing list. If any updates to the mailing list are needed based on future changes, Mountain Valley will provide revised contact information accordingly.

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**Mountain Valley Pipeline, LLC
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Request:

Resource Report 10 – Alternatives

Question 2

Provide revised narrative, tables, and figures for a new variation that combines the MP 23.9 to MP 25.4 Variation (from RR 10) with the MP 25.3 to MP 25.5 that was filed on July 15, 2025 (due to the Eden Loop Project). Also indicate whether any unwilling landowners are associated with this variation and if so, how many.

Response:

Similar to the route variations discussed in Question 1 above, the route variations were developed at different times for different purposes, and it is therefore appropriate to maintain these variations as distinct route variations for clarity and consistency in documentation. The MP 23.9 to MP 25.4 variation was developed independently and is unrelated to the Eden Loop Project, whereas the MP 25.3 to MP 25.5 variation was specifically filed in response to Eden Loop considerations.

The route variations at MP 23.9 and 25.3 involve landowners whose parcels were previously acquired. The changes associated with these variations are very minor in nature. At this time, Mountain Valley does not expect any of the affected landowners to be unwilling, and there is no indication that any have expressed opposition to the revised alignment.

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Request:

Resource Report 10 – Alternatives

Question 3

Regarding route variations MP 0.7 to MP 1.3 and MP 22.7 to MP 22.9 (as filed on July 15, 2025), indicate whether these variations involve unwilling landowners and if so, how many.

Response:

Route Variation MP 0.7 to MP 1.3 crosses four landowners whose parcels were previously acquired. Of these, three have communicated with Mountain Valley regarding the Amendment Project. One landowner has not explicitly denied access or stated opposition but has repeatedly declined to engage in communication with Mountain Valley. Mountain Valley will continue efforts to establish contact with this landowner.

Route Variation MP 22.7 to MP 22.9 also crosses landowners whose parcels were previously acquired. Mountain Valley is unaware of any unwilling landowners associated with this revised alignment.

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Request:

Resource Report 11 – Reliability and Safety

Question 1

In its response to RR 11 No. 1, Mountain Valley states “an updated table 11.2-1 with the milepost (MP) ranges for the Class 2 and 3 areas is included as Comparison table 11.2-1 in attachment G-3 of this Environmental Information Request response.” However, table 11.2-1 in attachment G-3 does not contain MP ranges for the classes. Therefore, provide an updated table 11.2-1 which includes MP ranges for the Class 1, 2, and 3 areas.

Response:

A table providing the U.S. Department of Transportation (“DOT”) Class locations by milepost is provided in the Table C below.

Table C				
DOT Classifications along the Amendment Project by MP				
DOT Classification	Begin MP	End MP	County, State	Approximate Length (miles)
1	0.00	2.96	Pittsylvania, VA	2.96
2	2.96	3.42	Pittsylvania, VA	0.46
1	3.42	3.58	Pittsylvania, VA	0.16
2	3.58	3.77	Pittsylvania, VA	0.20
1	3.77	3.87	Pittsylvania, VA	0.09
2	3.87	4.29	Pittsylvania, VA	0.43
3	4.29	4.37	Pittsylvania, VA	0.08
2	4.37	4.47	Pittsylvania, VA	0.09
1	4.47	10.13	Pittsylvania, VA	5.66
2	10.13	10.94	Pittsylvania, VA	0.81
1	10.94	13.12	Pittsylvania, VA	2.18
2	13.12	13.71	Pittsylvania, VA	0.59
1	13.71	15.94	Pittsylvania, VA	2.23
2	15.94	17.06	Pittsylvania, VA	1.12
1	17.06	18.42	Pittsylvania, VA	1.36
2	18.42	18.63	Pittsylvania, VA	0.21
1	18.63	18.89	Pittsylvania, VA	0.26
2	18.89	19.11	Pittsylvania, VA	0.23
1	19.11	19.15	Pittsylvania, VA	0.04
2	19.15	20.16	Pittsylvania, VA	1.01
3	20.16	20.20	Pittsylvania, VA	0.04
2	20.20	20.61	Pittsylvania, VA	0.41

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Table C				
DOT Classifications along the Amendment Project by MP				
DOT Classification	Begin MP	End MP	County, State	Approximate Length (miles)
1	20.61	30.84	~6.2 in Pittsylvania, VA ~4.03 in Rockingham, NC	10.23
2	30.84	31.29	Rockingham, NC	0.45

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Request:

Attachment 1-1 – Construction Plan (Appendix 1-G) Redlines

Regarding the *Wetland and Waterbody Construction and Mitigation Procedures*:

Question 1

Table 1 of the *Wetland and Waterbody Construction and Mitigation Procedures*, indicates that a modification to section V.B.3.c (workspace parallels waterbodies within 15 feet) were approved under docket CP19-14. However, an all-new appendix B (table 2.3-9) was provided. In addition, the new appendix B (table 2.3-9) includes waterbody S-B023, which is located within a re-route area (MP 24.5) and wasn't approved for the certificated Project. Resolve the apparent discrepancy using the guidance in question 4 below.

Response:

Table 1-Alternative Measures to the FERC Procedures Requested by Mountain Valley for the Amendment Project in the *Wetland and Waterbody Construction and Mitigation Procedures* incorporates requests for alternative measures for the locations where the construction workspace parallels waterbody features that are a result of survey data collected in 2024 and 2025.

Since the waterbody features are based on newly collected survey data, the locations, presence, and boundaries of these features have changed. As such, Mountain Valley is requesting that the Commission review its request for alternative measures to section V.B.3.c for locations where the workspace parallels waterbodies within 15 feet, as requested in Table 1 of *Mountain Valley's Wetland and Waterbody Construction and Mitigation Procedures*.

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Request:

Attachment 1-1 – Construction Plan (Appendix 1-G) Redlines

Regarding the *Wetland and Waterbody Construction and Mitigation Procedures*:

Question 2

Table 1 indicates modifications to section VI.A.3 (limit right-of-way width to 75 feet in wetlands) were approved under docket CP19-14, but not at this one new location. Clarify if the previously approved locations are still needed for the Amendment Project. If so, these should be included in a revised *Wetland and Waterbody Construction and Mitigation Procedures*.

Response:

Mountain Valley has provided tables for waterbodies and wetlands crossed by the Amendment Project in Attachment 2 of this Environmental Information Request response. These features are reflective of survey data collected in 2024 and 2025, as well as coordination with the USACE, VADEQ, NCDEQ, and discussions with Transco. Requested crossing methods associated with each feature are also included in the tables.

Since the wetland features are based on newly collected survey data, the locations, presence, and boundaries of these features have changed. As such, Mountain Valley is requesting that the Commission review its request for alternative measures to section VI.A.3 for a greater than 75-foot construction right-of-way as requested in Table 1 of Mountain Valley's *Wetland and Waterbody Construction and Mitigation Procedures*.

Respondent: James Sabol
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Request:

Attachment 1-1 – Construction Plan (Appendix 1-G) Redlines

Regarding the *Wetland and Waterbody Construction and Mitigation Procedures*:

Question 3

Table 1 indicates that a modification to section VI.B.1.d (access roads within wetlands can only be existing roads that can be used with no modifications or improvements) can be found in appendix C (an excerpt from appendix 1-F) (this appears to be a new modification requested for the Amendment Project). Clarify if footnote “e” “no improvements to occur within wetlands crossed by existing access roads” would apply to the two requested roads (TA-PI-011 and TA-PI-067). Clarify why these roads are listed as “new” when Appendix 1-F (Attachment G-3) has these roads listed as “existing” for the FEIS (as this is a newly requested modification, access roads approved under CP19-14 would still need to be included as this impact was not previously requested or approved).

Response:

The updated access road tables in Attachment 3 (for those areas of the Amendment Project Outside the Original Certificated Project footprint) and Attachment 4 (of this Environmental Information Request response provide updates to clarify that temporary access roads TA-PI-011 and TA-PI-067 are existing access roads, not new.

As these are existing access roads, footnote ‘e’ (no improvements to occur within wetlands crossed by existing access roads) is valid for these two access roads, and no variances will be required. An updated copy of Mountain Valley’s *Wetland and Waterbody Construction and Mitigation Procedures* dated September 2025 that excludes this variance request is included in Attachment 7 of this Environmental Information Request response.

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Request:

Attachment 1-1 – Construction Plan (Appendix 1-G) Redlines

Regarding the *Wetland and Waterbody Construction and Mitigation Procedures*:

Question 4

Revise all of the appendices included in the *Wetland and Waterbody Construction and Mitigation Procedures* to show changes (strikethroughs and additions) from the version approved under CP19-14 (rather than the current tables which seem to imply the entire table is new). The tables should indicate (via asterisk, footnote, or color coding) which rows are already approved, which are already approved but no longer applicable, and which rows are new (also identify which are new due to surveys and which are new due to route changes).

Response:

Appendix A-Additional Temporary Workspace within 50 feet of Wetland or Waterbody, and Appendix B-Construction Workspace Parallels Waterbody (or wetland) within 15 Feet, all incorporate new features that are a result of recent surveys. Appendix C-Proposed New, Improved and Private Access Roads for the Amendment Project has been removed.

Since the waterbody and wetland features are based on newly collected survey data, the locations, presence, and boundaries of these features have changed. As such, Mountain Valley is requesting that the Commission review its request for alternative measures requested in Table 1 of Mountain Valley's *Wetland and Waterbody Construction and Mitigation Procedures* and the subsequent feature locations identified in Appendices A and B.

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Request:

Attachment 1-1 – Construction Plan (Appendix 1-G) Redlines

Regarding the *Pipeline Stream Crossing Burial Recommendations*:

Question 1

Mountain Valley’s March 28, 2025 filing (table 1.4-1) stated that the Pipeline Stream Crossing Burial Recommendations “is being revised based on the Amendment Project scope and will be filed with FERC.” However, the version filed on August 8, 2025 does not include any redline changes. Clarify if revisions were made to the document. If revisions were made, provide a redline version of the *Pipeline Stream Crossing Burial Recommendations*.

Response:

A redline copy of Mountain Valley’s *Pipeline Stream Crossing Burial Recommendations* is included in Attachment 6 of this Environmental Information Request response.

Respondent: James Sabol
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Date: September 2, 2025

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Request:

Attachment 1-4 – Updated Construction Plans (Appendix 1-G)

Question 1

The Acid Forming Materials (AFM) Contingency Plan refers to the “proposed Alternative Project or “Alternate Project.” Should this have been the proposed “Amendment Project?”.

Response:

Yes. The reference in the Acid Forming Materials (“AFM”) Contingency Plan to the “proposed Alternative Project” or “Alternate Project” should have been a reference to the “proposed Amendment Project” or “Amendment Project.” This was a typographical error, and the AFM Contingency Plan has been revised accordingly and is included in Attachment 7 of this Environmental Information Request response.

Respondent: James Sabol
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Request:

Attachment 1-5 – Updated Agency Correspondence (Appendix 1-I)

Question 1

The Virginia Department of Environmental Quality’s (VADEQ) July 15, 2025 letter to Mountain Valley states “based on data presented by SSEP [Southeast Supply Enhancement Project] at the same eight (8) [stream] crossings listed above, please submit geotechnical studies and other data demonstrating that the adjacent pipeline information is either incorrect or change your crossing method after conducting appropriate geotechnical evaluation(s).” Clarify when the requested geotechnical studies will be completed and filed. Also clarify if Mountain Valley intends to change the proposed crossing method for these 8 stream crossings.

Response:

Mountain Valley Pipeline reviewed the VADEQ July 15, 2025 comment letter, which requested geotechnical studies or a change in crossing method for eight stream crossings where Mountain Valley’s proposed trenchless (conventional bore) method differs from Transco’s proposed open-cut method to be utilized in the construction of its Southeast Supply Enhancement Project (“SSEP”).

Mountain Valley submitted its response to the VDEQ on August 22, 2025. Within its response, Mountain Valley clarified the following:

- **Geotechnical Studies:** Mountain Valley relied on existing geological and soil data; directly relevant experience completing trenchless crossings in the same area (Pittsylvania County) with similar geological conditions for the Mountain Valley Mainline Project; and site-specific evaluations to reaffirm that the conventional bore method remains practicable and safe for each crossing. The response also explained that excavation of bore pits on each side of a trenchless crossing will expose the subsurface geological conditions down to the depth of the bore. That information will be used to select the appropriate cutting head and dewatering system for the conditions at each trenchless crossing. Lastly, the response emphasized that geotechnical data is only one of many factors that must be considered when evaluating appropriated crossing methods and should not solely be determinative in crossing method selection.

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- **Crossing Method Changes:** As Mountain Valley reiterated in its response to VADEQ, the selection of an appropriate crossing method requires the application of engineering judgment and construction experience to a range of fact-specific variables. After reevaluating each location, including ongoing discussions with Transco's SSEP team, Mountain Valley concluded that the differences in crossing methods between the two projects are due to site- and project-specific conditions, engineering judgment, and construction experience. The conventional bore method remains the preferred and practicable approach for the Amendment Project at these locations. Accordingly, Mountain Valley does not intend to change its proposed crossing method of conventional bore for any of the eight stream crossings.

Mountain Valley further notes that the USACE regulations provide that stream and wetland impacts must be avoided if a "practicable alternative" is available. 40 C.F.R. § 230.10(a). Because Mountain Valley has concluded that trenchless crossings are practicable for each of the eight crossings, the USACE regulations prohibit Mountain Valley from changing its crossing methods to open cuts.

Mountain Valley's response letter to the VADEQ is presented in Attachment 8 of this Environmental Information Request response.

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Request:

**Attachment G-1 – RR Tables for the Amendment Project Outside the Original
Certificated Project Footprint**

Question 1

Revise appendix 1-D (Additional Temporary Workspace for the Amendment Project Outside the Original Certificated Project Footprint) to denote (via asterisk, footnote, or color coding) which ATWS are modified (meaning they are located in the same location as was certificated but may have been expanded or reduced in size) or entirely new (meaning these workspaces are outside of the certificated workspace (even if the ATWS ID was previously used by the certificated Project [such as 1173K]).

Response:

Mountain Valley is resubmitting its Appendix 1-D-Additional Temporary Workspace Areas Associated with Construction of the Original Certificated Project and Amendment Project in Attachment 4 of this Environmental Information Request response. This table has been color-coded to indicate the workspaces that are located or have portions that extend outside the original certificated workspace, have been removed, or have been modified.

- Red shading denotes that the workspace has been removed since the FEIS.
- Green shading denotes that the workspace is new since the February 2020 FEIS.
- Blue shading denotes that the workspace has been modified since the February 2020 FEIS.

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Request:

**Attachment G-1 – RR Tables for the Amendment Project Outside the Original
Certificated Project Footprint**

Question 2

Regarding appendix 2-A (Waterbodies Crossed by the Amendment Project
Outside the Certificated Project Footprint):

- a. Clarify why waterbodies S-B030 and S-B031 were not included as these waterbodies are located within an alignment change area and appear to be outside of certificated workspace per the alignment sheets (attachment 1-2 filed July 15, 2025). Waterbodies S-A002, S-B059, and S-B046 are within alignment change areas but were not included in appendix 2-A. Clarify if they were not included because while the pipeline crossing location shifted the waterbody would remain within certificated workspace;
- b. Waterbody S-B005 is listed as Trib to Town Creek. The alignment sheets (attachment 1-2 filed July 15, 2025) and appendix 2-A (G-3) list waterbody S-B005 as Dan River. Resolve the discrepancy; and
- c. Waterbodies S-B022, S-B024, S-B054, and S-B056 are listed as tributaries to Trotters Creek in appendix 2-A and are listed as Tributaries to the Dan River or NA in the Amendment Project Waterbody Name column in the appendix 2-A table. Resolve the discrepancy.

Response:

- a. Waterbodies S-B030 and S-B031 were inadvertently omitted from New Appendix 2-A (Attachment G-1 from Mountain Valley's Environmental Information Request response filed August 8, 2025). These features are crossed by the portions of the Amendment Project outside of the Original Certificated Project footprint, and are included in New Appendix 2-A included in Attachment 2 of this Environmental Information Request response.

Waterbodies S-A002, S-B059, and S-B046 occur in both the Amendment Project and the Original Certificated Project footprint; however, the pipeline crossing locations have shifted as a result of design adjustments following discussions with Transco. Because these waterbodies remain within certificated workspace, they

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- were not included in Appendix 2-A.
- b. Waterbody S-B005 is the Dan River. The reference to S-B005 as a tributary to Town Creek was an error in the table and has been corrected in the Appendix 2-A included in Attachment 2 of this Environmental Information Request response. The alignment sheets (included as Attachment 1-2 of Mountain Valley's Environmental Information Request response filed July 15, 2025) correctly identified S-B005 as the Dan River.
 - c. Waterbodies S-B022, S-B024, S-B054, and S-B056 are all tributaries to the Dan River. The references to Trotters Creek in New Appendix 2-A (Attachment G-1 from Mountain Valley's Environmental Information Request response filed August 8, 2025) were incorrect and are included in the Appendix 2-A included in Attachment 2 of this Environmental Information Request response.

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Request:

**Attachment G-1 – RR Tables for the Amendment Project Outside the Original
Certificated Project Footprint**

Question 3

Regarding appendix 2-B (Wetlands Crossed by the Amendment Project Outside the Original Certificated Project Footprint) clarify and resolve the discrepancies:

- a. why wetlands crossed via conventional bore (such as W-A001, W-B022, W-B049, etc.) would have construction and operational impacts;
- b. why wetland W-A001 has a crossing length of 0 acre;
- c. the alignment sheet (attachment 1-2 filed July 15, 2025) shows a pipeline crossing of wetland W-A013a from Station Number (No.) 97+62 to Station No. 101+41 but appendix 2-B states wetland W-A013a would be crossed via dry-ditch crossing and lists the crossing, construction impacts, and operational impacts as 0 acre each. In addition, the alignment sheet shows the entirety of wetland W-A013a would be within certificated workspace. Clarify why this wetland was included in this table;
- d. the alignment sheet shows a pipeline crossing of wetland W-B043 from Station No. 1063+13 to Station No. 1063+25 (within certificated workspace). Appendix 2-B states the construction method would be “workspace only” and lists 0.04 acre of construction impacts. Clarify if the information provided for this wetland is stating that the portion outside of the certificated workspace would be workspace only impacts (resulting in 0.04 acre of temporary construction impacts); and
- e. why wetlands crossed via HDD (such as W-B003 and W-W051) would have construction and operational impacts.

Response:

- a. For features crossed using trenchless methods, Mountain Valley calculated land use and wetland disturbances based on the full 75-foot right-of-way as shown on the alignment sheets and tables. This right-of-way is retained for contingency planning purposes, ensuring adequate space is available if unforeseen conditions require adjustments during construction. However, Mountain Valley only intends

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to clear a 30-foot travel lane within this workspace for both construction and long-term operation of the pipeline. This reduced clearing footprint minimizes actual disturbance to sensitive resources such as wetlands and waterbodies. While the full 75-foot corridor is used for impact calculations to maintain consistency and account for potential worst-case scenarios, the practical disturbance is expected to be significantly less due to the limited clearing associated with trenchless construction methods like HDD and conventional boring.

- b. Wetland W-A001 in New Appendix 2-B (Attachment G-1 from Mountain Valley's Environmental Information Request response filed August 8, 2025) should reflect a crossing length of 93.22 feet, not 0 acre. This has been corrected in the Appendix 2-B included in Attachment 2 of this Environmental Information Request response.
- c. Wetland W-A013a is entirely within the Original Certificated Project footprint and will be crossed by the pipeline through dry-ditch open cut techniques.
- d. The construction crossing method for W-B043 should be corrected to dry-ditch open-cut to account for the design adjustments following discussions with Transco.
- e. Please see response to part a above.

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

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Request:

**Attachment G-1 – RR Tables for the Amendment Project Outside the Original
Certificated Project Footprint**

Question 4

Clarify why the “ROA/Dan River Aquatic Habitat” is listed twice in table 3.3-1 (Significant or Sensitive Wildlife Habitats within 1 mile of the Amendment Project Outside the Original Certificated Project Footprint). Also, clarify and resolve apparent discrepancies in table 3.3-1, including (but not limited to) in attachment G-1 - MVP Southgate Net SB01CA Conservation Site is not listed and attachment G-3 - MVP Southgate Net SB01CA Conservation Site is listed as NA for the FEIS, but would have 3.0 acres affected during construction and 1.1 acres affected during operation for the Amendment Project.

Response:

The ROA/Dan River Aquatic Habitat is listed twice in New Table 3.3-1 because it occurs within 1 mile of the portions of the Amendment Project outside the Original Certificated Project footprint, at two separate milepost locations. This duplication is consistent with Table 3.3-1 of Resource Report 3 in Mountain Valley’s February 3, 2025 Amendment Application.

New Table 3.3-1 of Attachment G-1 of Mountain Valley’s Environmental Information Request response filed August 8, 2025, includes only those significant or sensitive wildlife habitats located within 1 mile of the portions of the Amendment Project outside the Original Certificated Project footprint. Because the MVP Southgate Net SB01CA Conservation Site is not within 1 mile of these portions, it was not included in New Table 3.3-1 of Attachment G-1.

However, Comparison Table 3.3-1 (Significant or Sensitive Wildlife Habitats within 1 Mile of the Original Certificated Project and Amendment Project) in Attachment G-3 of Mountain Valley’s Environmental Information Request response filed August 8, 2025, includes the MVP Southgate Net SB01CA Conservation Site, as this table applies to the entirety of the Amendment Project route (i.e., not just areas outside the Original Certificated Project footprint). This conservation site was not previously identified in the 2020 FEIS and is therefore labeled “NA” (Not Applicable) under the FEIS columns.

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Because it is applicable to the entire Amendment Project, the impact acreages (3.0 acres during construction and 1.1 acres during operation) are included under the Amendment Project columns, consistent with Table 3.3-1 of Resource Report 3 in Mountain Valley's February 3, 2025 Amendment Application.

Respondent: James Sabol
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Phone Number: 412.510.5831
Date: September 2, 2025

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Request:

**Attachment G-1 – RR Tables for the Amendment Project Outside the Original
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Question 5

Table 3.4-1 (Vegetation Acreage Affected by Construction and Operation of the Amendment Project Outside the Original Certificated Project Footprint) contains apparent errors in the Amendment Project totals and/or acreage values in the incorrect columns. While footnote “e” indicates that “sums may not equal the total of addends due to rounding,” the discrepancies below appear to be larger than a rounding error. Resolve the following discrepancies and provide a revised table:

- a. the Forested / Woodland, > Deciduous > Construction (column 4) Amendment Project total is listed as 7.57 acres when the sum of the acreages provided in this column totals 6.57 acres;
- b. the Rockingham contractor yards cell for the Forested / Woodland > Mixed > Construction (column 8) acreage is blank and the corresponding cell for Operation (column 9) is listed as 0.72 acre, but the construction total for Rockingham contractor yards (column 16) is listed as 0.72 acre and the operation total for Rockingham contractor yards (column 16) is listed as 0.00 acre; and
- c. the Wetlands > Herbaceous / Scrub Shrub Wetland (column 12) Amendment Project total is given as 0.38 acre when the sum of the acreages provided in this column totals 0.44 acre.

Response:

- a. The sum of the acreages should reflect 6.57; this has been corrected in the updated New Table 3.4-1 in Attachment 3 of this Environmental Information Request response.
- b. The sum of the Contractor Yard acreage for Forested / Woodland > Mixed > Construction (column 8) has been corrected to 0.35 acre (0.00 acre in Pittsylvania County and 0.35 acre in Rockingham County). No acreage should be listed in the Operation column; this has been corrected in the updated New Table 3.4-1 in Attachment 3 of this Environmental Information Request response.
- c. The sum of the acreages should reflect 0.44; this has been corrected in the

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updated New Table 3.4-1 in Attachment 3 of this Environmental Information Request response.

Respondent: James Sabol
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**Attachment G-1 – RR Tables for the Amendment Project Outside the Original
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Question 6

Table 3.4-2 (Acreage of Forest Interior and Forest Edge Affected by Construction and Operation of the Amendment Project Outside the Original Certificated Project Footprint) contains apparent errors in the facility subtotals rows and/or in the Amendment Project totals row. While footnote “g” indicates that “sums may not equal the total of addends due to rounding,” the discrepancies below appear to be larger than a rounding error. Resolve the following discrepancies and provide a revised table:

- a. the Interior Forest > Mixed > Construction H-650 Pipeline Right-of-Way acreage subtotal (column 6) is listed as 4.79 acres when the sum of the Pittsylvania, VA and Rockingham, NC values total 5.12 acres
- b. the Interior Forest > Mixed > Operation H-650 Pipeline Right-of-Way acreage subtotal (column 7) is listed as 2.68 acres when the sum of the Pittsylvania, VA and Rockingham, NC values total 3.01 acres
- c. the Interior Forest > Mixed > Construction Temporary and Permanent Access Roads acreage subtotal (column 6) is listed as 0.10 acre when the individual values for Pittsylvania, VA and Rockingham, NC counties are both 0.00 acre; and
- d. the Forest Edge > Evergreen > Construction (column 12) Amendment Project total is listed as 0.94 acre when the sum of the of the acreages provided in this column totals 1.00.

Response:

- a. The value in New Table 3.4-2 for Interior Forest > Mixed > Construction for the H-650 Pipeline Right-of-Way acreage subtotal has been corrected to 4.77 acres (4.77 acres in Pittsylvania County and 0.00 acre in Rockingham County).
- b. The value in New Table 3.4-2 for Interior Forest > Mixed > Operation for the H-650 Pipeline Right-of-Way acreage has been corrected to 2.66 acres (2.66 acres in Pittsylvania County and 0.00 acre in Rockingham County).

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- c. The value in New Table 3.4-2 for Interior Forest > Mixed > Construction for Temporary and Permanent Access Roads acreage subtotal has been corrected to 0.01 acre (0.01 acre in Pittsylvania County and 0.00 acre in Rockingham County).
- d. The total in New Table 3.4-2 for Forest Edge > Evergreen > Construction has been corrected to 1.01 acres (0.98 acre total in Pittsylvania County and 0.03 acre total in Rockingham County), which now reflects the accurate sum of values in the column.

All values have been corrected in the updated New Table 3.4-2 in Attachment 3 of this Environmental Information Request response.

Respondent: James Sabol
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Phone Number: 412.510.5831
Date: September 2, 2025

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**Attachment G-1 – RR Tables for the Amendment Project Outside the Original
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Question 7

When comparing the forested acreages for construction and operation in table 3.4-1 (Vegetation Acreage Affected by Construction and Operation of the Amendment Project Outside the Original Certificated Project Footprint) and table 3.4-2 (Acreage of Forest Interior and Forest Edge Affected by Construction and Operation of the Amendment Project Outside the Original Certificated Project Footprint), the Amendment Project totals and the subtotals of the individual facility types do not match between the two tables (i.e., the amounts of forested acres provided in table 3.4-1 [24.2 acres] do not match the total amounts of forested acres [interior forest plus forest edge = 24.61 acres] provided in table 3.4-2). Resolve this discrepancy.

Response:

The discrepancies between New Table 3.4-1 and New Table 3.4-2 (originally in Attachment G-1 from Mountain Valley's Environmental Information Request response filed August 8, 2025) have been corrected, and the values between the two tables are now consistent with one another. The revised tables New Table 3.4-1 and New Table 3.4-2 are included in Attachment 3 of this Environmental Information Request response.

Respondent: James Sabol
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Date: September 2, 2025

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Request:

**Attachment G-1 – RR Tables for the Amendment Project Outside the Original
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Question 8

Table 6.5-1 (Potential Karst Terrain Crossed by the Amendment Project Outside the Original Certificated Project Footprint) includes only two rows which are identical to the first two rows of FEIS table 4.1-2 (Locations of Field Surveys of Karst-Susceptible Bedrock near the Southgate Project). Clarify why the information provided is identical when the table is supposed to provide areas outside of the certificated Project footprint. Section 4.1.4.5 of the FEIS states Mountain Valley conducted pedestrian surveys within 150 feet of the proposed alignment at the five locations listed in table 4.1-2 to further assess the presence of karst terrain and no karst features were identified. Clarify if new pedestrian surveys were conducted in areas of new footprint.

Response:

New Table 6.5-1 in Attachment G-1 included areas of karst crossed by the Amendment Project workspaces that are located outside of the Original Certificated Project footprint. The boundaries of the karst formations presented in the dataset extend outside of the Original Certificated Project workspace and intersect the areas of the Amendment Project that are located outside the Original Certificated Project footprint which is the reason they were still listed in the table. These karst formations are consistent with those analyzed as part of the Original Certificated Project.

No new areas of karst were identified during civil or environmental surveys conducted in 2024 and 2025.

Respondent: James Sabol
Position: Project Manager
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Request:

**Attachment G-1 – RR Tables for the Amendment Project Outside the Original
Certificated Project Footprint**

Question 9

Provide table 8-E in attachment G-1, which appears to be missing, as indicated in the August 8, 2025 response to question RR 8 No. 9.

Response:

The New Table 8-E that was missing from Mountain Valley's Environmental Information Request response filed August 8, 2025 has been provided in Attachment 2 of this Environmental Information Request response.

Respondent: James Sabol
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Phone Number: 412.510.5831
Date: September 2, 2025

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Request:

**Attachment G-3 – Updated and Comparison RR Tables Showing Differences
Between the Original Certificated Project and the Amendment Project**

Question 1

Table 1.3-1 (Land Requirement for the Original Certificated Project and Amendment Project Pipeline/Associated Workspace) states pipeline land requirements for construction of the Amendment Project would be 355.7 acres and operational land requirements would be 190.99 acres. However, table 3-1 (Summary and Comparison of Impacts of the Certificated Route and Amendment Project for Selected Resource Types- column labeled “Amendment Project Impacts [Entire Amendment Project Route]”) states pipeline land requirements for construction of the Amendment Project would be 353.58 acres and operational land requirements would be 188.79 acres. Resolve the apparent discrepancy.

Response:

The numbers presented in Comparison and Updates to Table 1.3-1 (355.77 acres required for pipeline construction and 190.99 acres required for pipeline operation) reflect the accurate land requirements for temporary and permanent workspaces for the H-650 pipeline for the Amendment Project. The numbers presented in Table 3-1 were in error and have been corrected in the revised Table 3-1 (Summary and Comparison of Impacts of the Certificated Route and Amendment Project for Selected Resource Types) in the updated Attachment G-4 included in this Environmental Information Request response.

The Comparison and Updates to Table 1.3-1 indicates that 355.77 acres are required for pipeline construction and 190.99 acres are required for pipeline operation, which are the accurate land requirements for the Amendment Project pipeline construction and operation, inclusive of aboveground facility workspaces.

The numbers presented in Table 3-1 identify the land required for construction and operation of the *pipeline* (353.58 and 188.79 acres, respectively) and *aboveground facilities* (2.19 and 2.19 acres, respectively), which is listed several lines below of the same table. When added together, these numbers equal the 355.77 acres required for pipeline construction and 190.99 acres land required for construction that are presented in Comparison and Updates to Table 1.3-1.

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Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

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Question 2

Table 1.3-2 (Land Requirements for Original Certificated Project and Amendment Project Aboveground Facilities) states the FEIS reported that meter station LN 3600 Interconnect would impact 0.28 acre during construction. However, FEIS table 2.3-1 states LN 3600 Interconnect would impact 4.6 acres during construction. Resolve the apparent discrepancy.

Response:

FEIS Table 2.3-1 identifies that the LN 3600 Interconnect would impact 4.6 acres during construction because this acreage included portions of the permanent workspace associated with the pipeline itself which were assumed to be grouped together with impacts from the aboveground facility. For the Amendment Project, Mountain Valley refined this approach by isolating and reporting only the actual permanent footprint of the aboveground facility, excluding the pipeline-related workspace. Accordingly, the LN 3600 Interconnect would impact 0.28 acre during construction.

For the purposes of calculating acreages associated with the FEIS, the 0.28-acre facility footprint was utilized throughout the tables in Attachment G-3 of Mountain Valley's Environmental Information Request response for consistency purposes.

Respondent: James Sabol
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**Attachment G-3 – Updated and Comparison RR Tables Showing Differences
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Question 3

Provide a new version of table 2.2-1 (Private Wells and Springs within 150 feet of the Original Certificated Project and Amendment Project Construction Workspace) which denotes which wells within the Amendment Project footprint were discussed in the FEIS, which wells were identified due to new surveys, and which wells are new due to route changes.

Response:

A new version of Table 2.2-1 is provided in Attachment 4. This table has been color-coded to indicate the wells that were removed from the Amendment Project. Red shading on the table indicates that the well has been removed from the Amendment Project.

All wells on the table were analyzed as part of the 2020 FEIS. No new wells have been identified to date.

Respondent: James Sabol
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Date: September 2, 2025

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Request:

**Attachment G-3 – Updated and Comparison RR Tables Showing Differences
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Question 4

Appendix 1-F (Proposed New, Improved, and Private Access Roads for the Original Certificated Project and Amendment Project) states access road TA-PI-011 is “new” for the Amendment Project but “existing” for the FEIS. New appendix 1-F also lists this access road as “new.” This is only one example of access roads within appendix 1-F which are listed as “existing” for the FEIS but “new” for the Amendment Project. Resolve all discrepancies.

Response:

Updated and new access road tables have been provided in Attachments 3 and 4 to this Environmental Information Request response. All discrepancies have been resolved and changes are denoted in red text.

Respondent: James Sabol
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Date: September 2, 2025

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Question 5

Table 8.2-5 states the second railroad crossing would be at MP 25.6. RR 9 states the second railroad crossing would be at MP 25.7. Resolve the discrepancy.

Response:

The second railroad crossing is located at MP 25.7. The values in Table 8.2-5 were rounded down. A revised Comparison Table 8.2-5 has been provided in the updated Attachment G-3 of this Environmental Information Request response.

Respondent: James Sabol
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Date: September 2, 2025

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Question 6

Regarding appendix 2-A (Waterbodies Crossed by the Original Certificated Project and/or the Amendment Project) clarify and resolve the discrepancies:

- a. streams S-A067 and S-A030 are listed as “avoiding” on the table, however, alignment sheets show them within Amendment Project workspace;
- b. streams S-A040 and S-A041 are listed in the table as a dry-ditch open-cut crossings, however, the alignment sheets do not depict centerline crossings for either waterbody;
- c. footnote “1/” states “feature delineated by Transco and added at the request of the VADEQ. Mountain Valley has committed to avoiding impacts to these features.” Provide maps or revised alignment sheets which depict these features;
- d. the table lists S-B026 on access road TA-PI-061. Clarify if stream S-B026 is stream S-021 as depicted on the alignment sheets; and
- e. streams S-A011 and S-A068, as depicted on alignment sheets are not included in the table.

Response:

- a. Waterbodies S-A067 and S-A030 are located within the construction workspace but will be avoided during construction. These features will be protected with high-visibility safety fencing or equivalent protective barriers and erosion sediment controls so that construction activity can occur adjacent to the features without direct impact.
- b. Waterbodies S-A040 and S-A041 are located within the construction workspace but are not crossed by the pipeline centerline. Timber mats will be placed temporarily across these features during construction.
- c. Revised Drawing No. PA-PIVA-H-650-045A, which depicts the features in question, is included as Attachment 9 of this Environmental Information Request response.
- d. Yes, Waterbody S-B026 was inadvertently labeled S-B021. The revised

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alignment sheet (Drawing No. ACCESS ROAD TA-PI-061) is included as Attachment 9 of this Environmental Information Request response.

- e. Waterbodies S-A011 and S-A068 are outside the Amendment Project footprint but did previously intersect with the Original Certificated Project workspaces and should have been included on Comparison and Updates to Appendix 2-A (Attachment G-3 of Mountain Valley's Environmental Information Request response filed August 8, 2025).

Mountain Valley has provided a table for waterbodies crossed by the Amendment Project in Attachment 2 of this Environmental Information Request response.

Respondent: James Sabol
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Date: September 2, 2025

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Question 7

Regarding appendix 2-B (Wetlands Crossed by the Original Certificated Project and/or the Amendment Project) clarify and resolve the discrepancies:

- a. wetlands W-A012, W-A080, W-A075, W-A052a, W-A052b, W-F001, and W-B027a are listed as “avoiding” on the table, however, alignment sheets show them within Amendment Project workspace;
- b. wetland W-A036, W-A037, W-A038, W-B038c, W-B024, W-B015, and W-B052a are listed as dry-ditch open-cut crossings on the table, however, the alignment sheets do not depict centerline crossings of these wetlands;
- c. wetland W-A052b (as depicted on the alignment sheet) is missing from the table;
- d. wetland W-B044 was struck through on the table, however, this wetland is depicted on the alignment sheet as within Amendment Project workspace;
- e. wetland W-B039a is listed as “avoiding” on the table and is depicted on the alignment sheets between the bore pits for the conventional bore crossing of wetland W-B039b. Clarify if W-B039a would be avoided due to the conventional bore or if the wetland would incur workspace only impacts (such as a travel lane);
- f. clarify if the portions of wetlands W-B036b and W-B027a outside of the conventional bore pits would incur workspace only impacts;
- g. wetland W-A013a is listed as a workspace-only impact on access road TA-PI-004, however, the alignment sheet for this access road does not depict wetland W-A013a;
- h. wetland W-A047 on access road TA-PI-035 is listed as “workspace only” on the table. Clarify why this wetland would not be timber matted;
- i. wetland W-B021 spans the entire width of access road TA-PI-061 but is listed as “NA” for crossing method;
- j. wetland W-B034 on access road PA-RO-000 is listed as “avoiding” on the table, however, the alignment sheet depicts the wetland within the footprint of

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- the access road;
- k. open water features OW-A001 and OW-A002 are stormwater basins within contractor yards. These features are listed on the table as “workspace only” with construction impacts (totaling 0.21 acre). Appendix A of Mountain Valley’s Procedures state “no impacts to this feature are anticipated” for OW-A001 and OW-A002; and
 - l. footnote “l/” states “feature delineated by Transco and added at the request of the VADEQ. Mountain Valley has committed to avoiding impacts to these features.” Provide maps or revised alignment sheets which depict these features.

Response:

- a. Wetlands W-A012, W-A080, W-A075, W-A052a, W-A052b, and W-F001 are located within the construction workspace but will be avoided during construction. Mountain Valley will install high-visibility safety fencing (e.g., orange construction fencing) or an equivalent barrier around these resources to prevent inadvertent encroachment from adjacent construction.
- b. Wetlands W-A036, W-A037, W-A038, W-B015, W-B024, W-B038c, and W-B052a are located within the construction workspace and are not crossed by the pipeline centerline. Temporary timber matting will be installed to facilitate equipment passage while minimizing ground disturbance.
- c. Wetland W-A052b is located outside of the construction workspace and, therefore, excluded from the table that identifies wetlands crossed by the Amendment Project. It will be completely avoided during construction.
- d. Wetland W-B044 was struck through on the Appendix 2-B filed in Mountain Valley’s response to FERC’s Environmental Information Request response filed August 8, 2025, as the minor alignment shifts that occurred as a result of the discussions with Transco relocated the construction workspace away from this feature. W-B044 is now located outside of the construction workspace.
- e. Wetland W-B039a will be avoided during construction. A travel lane/maintenance corridor will be established through W-B039b.
- f. Wetland W-B036b will be crossed by a conventional bore, however, impacts have been calculated based on the 75-foot right-of-way as explained in Question 4 of Resource Report 2 above. Temporary impacts will occur to this wetland but is anticipated to be less than indicated in the wetland table provided in Attachment 2 of this Environmental Information Request response to account for the 30-foot-wide temporary travel lane during construction/maintenance corridor for operation.
- g. A small portion of wetland W-A013a overlaps access road TA-PI-004, which is

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depicted on Page 8 (Drawing No. PA-PIVA-H-650-05) of the Updated Appendix 1-A (Attachment 1-2) alignment sheets that were filed as part of Mountain Valley's Environmental Information Request response filed on July 15, 2025.

- h. Wetland W-A047 is located within temporary access road TA-PI-035 and will be temporarily crossed using timber mats during construction.
- i. Wetland W-B021 is located within temporary access road TA-PI-061 and will be temporarily crossed using timber mats during construction.
- j. Wetland W-B034 is located within the permanent access road PA-RO-000 but outside of the existing paved limits of the road. This wetland will be avoided during construction. Erosion controls to protect this feature from adjacent construction activity will also be installed.
- k. Features OH-A001 and OW-A002 are located within contractor yards; however, both of these stormwater basins will be avoided during construction. Mountain Valley will install high-visibility safety fencing or equivalent protective barriers around these features to prevent inadvertent impacts during adjacent construction.
- l. Revised Drawing No. PA-PIVA-H-650-045A, which depicts the features in question, is included as Attachment 9 of this Environmental Information Request response.

Mountain Valley has provided a table for wetlands crossed by the Amendment Project in Attachment 2 of this Environmental Information Request response.

Respondent: James Sabol
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Phone Number: 412.510.5831
Date: September 2, 2025

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Request:

**Attachment G-3 – Updated and Comparison RR Tables Showing Differences
Between the Original Certificated Project and the Amendment Project**

Question 8

The July 15, 2025 response to question RR 8, No. 12 indicates there were no new or modified site-specific residential construction plans for the Amendment Project compared to the certificated Project, except that two new plans were added (identification numbers were previously used for areas beyond MP 31.3, but then the identification numbers were recycled for use at different locations for the Amendment Project). However, the identified drawings RSS-H650-046 at MP 8.57 and RSS-H650-047 for CY-36 do not appear in the August 8, 2025 filing of comparison table 8-E in attachment G-3. Reconcile the apparent discrepancies and provide a descriptive table listing which site-specific residential construction plans were modified and/or newly added since the certificated Project.

Response:

Mountain Valley's July 15, 2025 response previously stated that of the site-specific residential construction plans that were included in Appendix 8-D of the February 3, 2025 Amendment Project Application, all drawings after MP 31.3 from the Original Certificated Project and Drawing No. RSS-H650-029 (MP 16.7 in Pittsylvania County) were removed. The answer also stated that the two drawings (Drawing Nos. RSS-H650-046 and RSS-H650-047) for areas beyond MP 31.3 had been renamed and included in the February 3, 2025 Amendment Project Application.

Comparison Table 8-E (Structures within 50 Feet of the Original Certificated Project and Amendment Project) has been updated within the updated Attachment G-3 included in this Environmental Information Request response and includes appropriate reference to both Drawing Nos. RSS-H650-046 and RSS-H650-047. The two drawings that have been added/modified are further detailed in the table below.

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Added or Modified Residential Construction Plan Drawings for the Amendment Project		
Residential Construction Plan Number	Approximate MP	Notes
RSS-H650-046	8.57	Drawing number RSS-H650-046 previously referenced MP 39.6 in Rockingham County, North Carolina, which is now outside of the Amendment Project area. This is a newly developed residential construction plan for the Amendment Project at this location.
RSS-H650-047	CY-036	Drawing number previously referenced MP 39.6 in Rockingham County, North Carolina, which is now outside of the Amendment Project area. This is a newly developed residential construction plan for the Amendment Project, as CY-036 was not proposed as part of the Original Certificated Project.

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
Date: September 2, 2025

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
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**Responses to FERC Office of Energy Projects Environmental Information Request 4
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Request:

Attachment G-4 – Comparative Impact Summary for the Original Certificated Project and the Amendment Project

Question 1

Table 3-1 (Summary and Comparison of Impacts of the Certificated Route and Amendment Project for Selected Resource Types- column labeled “Authorized Project Impacts [Original Certificated Project]”) states land requirements for construction of the Certificated Project would be 866.6 acres. However, FEIS table 2.3-1 states the certificated Project (pipeline only) would impact 1,159.5 acres during construction. Resolve the apparent discrepancy.

Response:

The acreage reported in Table 3-1 (866.6 acres) was taken from Mountain Valley’s Supplemental Filing #5 under CP19-14 (Accession No. 20191023-5022), which included only temporary and permanent workspace for the H-605 and H-650 pipeline for the February 2020 FEIS (Original Certificated Project). This value excludes the 292.9 acres of additional temporary workspace (“ATWS”), which is listed two rows below. When added, the total equals 1,159.5 acres, consistent with the value presented in the February 2020 FEIS.

Respondent: James Sabol
Position: Project Manager
Phone Number: 412.510.5831
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Request:

Attachment G-4 – Comparative Impact Summary for the Original Certificated Project and the Amendment Project

Question 2

Revise table 3-1 to include number of wetland crossings.

Response:

Mountain Valley has provided tables for waterbodies and wetlands crossed by the Amendment Project in Attachment 2 of this Environmental Information Request response. These features include the incorporation of updated survey data as collected in 2024 and 2025, as well as coordination with the USACE, VADEQ, NCDEQ, and discussions with Transco. A table identifying the wetlands crossed by the Amendment Project are provided in Attachment 2 of this Environmental Information Request response.

While the data has been refreshed to reflect current site conditions and recent updates to public datasets, the pipeline construction crossing procedures and minimization measures outlined in the February 2020 FEIS remain applicable and appropriate for the Amendment Project. These measures continue to represent best practices for reducing environmental impacts and should be considered consistent with the Original Certificated Project commitments.

Respondent: James Sabol
Position: Project Manager
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**Mountain Valley Pipeline, LLC
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**Responses to FERC Office of Energy Projects Environmental Information Request 4
Dated August 25, 2025**

Request:

Biological Assessment (BA) – Filed August 15, 2025

Question 1

In response to the Sierra Club’s comment letter (20250820-5005), provide a public version of Mountain Valley’s BA.

Response:

Within the next week, Mountain Valley will be submitting an updated Biological Assessment that is revised to address discrepancies identified in this Environmental Information Request. Mountain Valley will then file a public redacted version of the Biological Assessment.

Respondent: James Sabol
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Question 2

Section 1.4.1.1.3 of the BA states “no karst features, including caves or suitable portals, were documented within 0.25 mile of the Original Certificated Project. As the Amendment Project occurs entirely within the Original Certificated Project route, these findings are relevant to the Amendment Project as well (DAA 2018, Patti 2019).” The Amendment Project consists of at least 10 route deviations from the Certificated Project. Resolve the apparent discrepancy.

Response:

The 10 route deviations are all minor deviations and all occur entirely within a 0.25-mile buffer of the Original Certificated Project. To better clarify the intent of the statement, the Biological Assessment is being revised as follows: “*no karst features, including caves or suitable portals, were documented within 0.25 mile of the Original Certificated Project. As the Amendment Project occurs entirely within **0.25 mile of** the Original Certificated Project route, these findings are relevant to the Amendment Project as well (DAA 2018, Patti 2019).*”

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Question 3

Section 1.4.5.2 states “the Amendment Project’s proposed trenchless crossing of the Dan River occurs at the same location as the proposed crossing for the Original Certificated [Project] in Rockingham County, North Carolina.” However, RR 10 (filed with Mountain Valley’s application) states “the Dan River Variation moves the Dan River crossing approximately 150 feet to the southeast as well as providing a new entry route to the Dan River Interconnect #1.” Resolve the apparent discrepancy.

Response:

The statement in RR 10 (“the Dan River Variation moves the Dan River crossing approximately 150 feet to the southeast as well as providing a new entry route to the Dan River Interconnect #1”) is correct and Mountain Valley will correct this statement in the updated Biological Assessment.

Respondent: James Sabol
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Question 4

Table 2-2 states land required for construction totals 355.77 acres and land required for operation would be 190.99 acres. Table 3-1 (attachment G-4) states land required for construction totals 353.58 acres and land required for operation would be 188.79 acres. Resolve the apparent discrepancy.

Response:

Table 2-2 of the Biological Assessment reflects the same numbers as presented in the Comparison and Updates to Table 1.3-1 (355.77 acres required for pipeline construction and 190.99 acres required for pipeline operation), which presents the accurate land requirements for the Amendment Project pipeline construction and operation, inclusive of aboveground facility workspaces.

The numbers presented in Table 3-1 identify the land required for construction and operation of the pipeline (353.58 and 188.79 acres, respectively) and aboveground facilities (2.19 and 2.19 acres, respectively), which are listed several lines below in the same table. When added together, these numbers equal the 355.77 acres required for pipeline construction and 190.99 acres required for construction that are presented in Comparison and Updates to Table 1.3-1.

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Question 5

Section 2.4.1 states “Construction of the pipeline and associated facilities will occur within one construction season and will be undertaken in at least one construction spread using a combination of conventional open-cut and trenchless crossing methods at aquatic and sensitive resource areas.” However, Mountain Valley’s July 15, 2025 response to RR1 No. 3 states “pipeline construction is expected to begin in early 2027, with a targeted in-service date of mid-2028. This schedule is consistent with table 1.4-2, which identified construction occurring in 2027 and 2028 and included the potential for clearing activities in late 2026.” Resolve the apparent discrepancy.

Response:

As used in the Biological Assessment, the phrase “one construction season” is intended to describe continuous construction undertaken throughout the year in at least one construction spread. The construction schedule outlined in Mountain Valley’s response to FERC’s Environmental Information Request response filed July 15, 2025, and Table 1.4-2 is correct.

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Biological Assessment (BA) – Filed August 15, 2025

Question 6

Table 2-4 (Hydrostatic Test Water Sources and Discharge Locations for the Amendment Project) lists the proposed water source at MP 30.8 in watershed Roanoke River Basin and proposed test water discharge location at MP 31.3 in watershed Roanoke River Basin. However, MPs 30.8 and 31.3 are in the HUC-12 watershed Town Creek-Dan River. Resolve any discrepancies.

Response:

The February 2020 FEIS identified the watershed in this area as the Roanoke River Basin. Comparison Table 2.3-7 (Proposed Hydrostatic Test Water Use Summary for the Original Certificated Project and the Amendment Project) within Attachment G-3 that was provided in Mountain Valley's response to FERC's Environmental Information Request response filed August 8, 2025 notes this watershed as the Town Creek-Dan River watershed. The Biological Assessment is being updated accordingly.

Respondent: James Sabol
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**Mountain Valley Pipeline, LLC
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Dated August 25, 2025**

Request:

Biological Assessment (BA) – Filed August 15, 2025

Question 7

Section 2.4.2.1 states “The Amendment Project crosses 102 waterbodies and 141 wetlands in North Carolina and Virginia.” However, table 3-1 (attachment G-4) states the Amendment Project would cross 183 waterbodies. Resolve the apparent discrepancy.

Response:

Table 3-1 (Attachment G-4 of Mountain Valley’s Environmental Information Request response filed August 8, 2025) identifies two distinct classifications to waterbodies: flow type (ephemeral, intermittent, perennial, or pond) and FERC classification (minor, intermediate, or major). Because both systems are applied to the same features (e.g., an intermittent stream may also be considered a minor stream), adding them together results in double-counting of each feature and an incorrect total of waterbodies.

Considering each classification on its own, the Amendment Project includes 83 waterbody crossings in Virginia and 18 in North Carolina, for a combined total of 101 (previously summed incorrectly to equal 102) waterbodies. The Biological Assessment is being revised accordingly to reflect that the Amendment Project crosses 101 waterbodies in North Carolina and Virginia. No changes are required for the number of wetlands crossed (i.e., the Amendment Project still crosses 141 wetlands in North Carolina and Virginia).

Respondent: James Sabol
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**Mountain Valley Pipeline, LLC
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Question 8

Footnote 11 (in section 2.4.2.1) states “The number of waterbody and wetland crossings identified here accounts for the resources that will experience temporary or permanent discharge of fill material (i.e., open-cut crossings, timber mat crossings, culverts, access roads, and ATWS) and the crossings of navigable waters of the U.S. (both open cut and trenchless).” Clarify which waterbodies would require culverts.

Response:

Four streams will have culverts replaced as part of construction activities. Virginia streams S-A007 and S-A065 and North Carolina streams S-B006 and S-B007. All streams are classified as intermittent except for S-A065, which is ephemeral.

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Question 9

Section 2.4.2.1.1 states “The pipe will be placed in the trench to a length of at least 10 feet beyond the high bank of the stream and will be installed to provide a minimum of 3 feet of cover from the waterbody bottom to the top of the pipeline. In areas of consolidated rock, Mountain Valley will excavate rock using hydraulic hammers (to the extent feasible) or blasting (only when necessary) to maintain the minimum depth of cover at two feet at waterbody crossings.” Section 2.4.1.3 (and table 2.4-1) of the FEIS state “at waterbody crossings, the pipe would be more deeply buried; with a minimum of 4 feet of cover at navigable waterways and a minimum of 2 feet of cover at waterbodies with consolidated rock.” Resolve the apparent discrepancy.

Response:

As written, there is no discrepancy. The Biological Assessment states the standard minimum depth of coverage for waterbody crossings and minimum depth of coverage when in consolidated rock (3 feet and 2 feet, respectively). This depth of cover is included in the Amendment Project’s Individual Permit application to the USACE. Regarding Section 2.4.1.3 (and Table 2.4-1) of the FEIS, the depth of cover differentiates between DOT classified locations. All waterbody crossings on the Amendment Project are DOT PHMSA Class 1-4. No navigable river, stream, or harbor crossings are present to require 4 feet of cover.

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Question 10

Section 2.5.3 states Mountain Valley would avoid “direct impacts to James spiny mussel and Atlantic pigtoe and designated critical habitat from instream construction by using trenchless crossing techniques in streams with known occupancy and/or critical habitat, as well as [the] Sandy River.” Provide a list of the streams including MPs with known occupancy and/or critical habitat for both species.

Response:

The Dan River (MP 30.8) is the only waterbody within the Amendment Project area that is documented to have known occupancy of James spiny mussel and Atlantic pigtoe. It also contains designated critical habitat for Atlantic pigtoe. The Amendment Project will install the pipeline across the Dan River using a trenchless crossing (i.e., HDD).

Separately, based on coordination with the USFWS Virginia and Raleigh Field Offices and the North Carolina Wildlife Resources Commission, Mountain Valley plans to use trenchless crossings at two streams--Sandy River in Virginia (MP 18.2) and Cascade Creek in North Carolina (MP 28.2)--that have no known occupancy for James spiny mussel or Atlantic pigtoe (or any other federally listed species) and that do not have designated critical habitat for any federally listed species.

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Question 11

Section 2.5.3 states a 1.0-millimeter mesh screen would be used for surface water withdrawals from the Dan River. Clarify if this size mesh, along with consideration of intake flow rate, would prevent impingement and entrainment of glochidia.

Response:

Freshwater mussel glochidia are microscopic (generally <200 µm), drift passively in the water column, and lack the ability to swim or avoid localized conditions. Because glochidia are smaller than the 1.0-mm screen opening, impingement likely would not occur. However, absent the implementation of conservation measures, entrainment could be possible if glochidia drift into the intake zone.

The use of a 1.0-mm mesh screen coupled with a through-screen approach velocity of 0.25 feet per second reflects the standard applicable best management practices (“BMPs”) for surface water withdrawals in North Carolina and Virginia. Notably, the 1.0-mm mesh size was requested by the VDWR during consultation on the Original Certificated Project and is consistent with agency standards for minimizing impacts to aquatic species for surface water intakes.

These BMPs will be supplemented for the Amendment Project by an additional conservation measure to protect glochidia – a seasonal restriction on water withdrawals. Atlantic pigtoe and James spinymussel differ in their reproductive strategies. Atlantic pigtoe is a short-term (tachytictic) brooder that spawns and releases glochidia within the same summer, while James spinymussel is a long-term (bradytictic) brooder that spawns in late summer to fall, broods glochidia over winter, and releases them in the spring. To avoid the potential for entrainment during these glochidia release periods, water withdrawals from the Dan River will not occur between May 15 and July 31. This seasonal restriction also provides protection for warmwater fish spawning.

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Date: September 2, 2025

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MVP Southgate Amendment Project
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List of Attachments

Attachment 1	Noise Study for Conventional Boring Locations <i>(Provided Under Separate Cover)</i>
Attachment 2	Waterbody and Wetland Tables for Features Crossed by the Amendment Project <i>(Provided Under Separate Cover)</i>
Attachment 3	Resource Report Tables for the Amendment Project Outside the Original Certificated Project Footprint <i>(Provided Under Separate Cover)</i>
Attachment 4	Updated and Comparison Resource Report Tables Reflecting Differences between the Original Certificated Project and the Amendment Project <i>(Provided Under Separate Cover)</i>
Attachment 5	Site-Specific Erosion Control Measures and Maintenance Requirements within 15 feet of a Waterbody <i>(Provided Under Separate Cover)</i>
Attachment 6	Updated Construction Plan (Appendix 1-G) Redlines <i>(Provided Under Separate Cover)</i>
Attachment 7	Updated Construction Plans (Appendix 1-G) <i>(Provided Under Separate Cover)</i>
Attachment 8	Updated Agency Correspondence (Appendix 1-I) <i>(Provided Under Separate Cover)</i>
Attachment 9	Selected Alignment Sheet Revisions <i>(Provided Under Separate Cover)</i>

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
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ATTACHMENT 1 – NOISE STUDY FOR CONVENTIONAL BORING LOCATIONS

Provided Under Separate Cover

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
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**ATTACHMENT 2 – WATERBODY AND WETLAND TABLES FOR FEATURES
CROSSED BY THE AMENDMENT PROJECT**

Provided Under Separate Cover

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
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**Responses to FERC Office of Energy Projects Environmental Information Request 4
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**ATTACHMENT 3 – RESOURCE REPORT TABLES FOR THE AMENDMENT PROJECT
OUTSIDE THE ORIGINAL CERTIFICATED PROJECT FOOTPRINT**

Provided Under Separate Cover

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
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**ATTACHMENT 4 – UPDATED AND COMPARISON RESOURCE REPORT
TABLES REFLECTING DIFFERENCES BETWEEN THE ORIGINAL
CERTIFICATED PROJECT AND THE AMENDMENT PROJECT**

Provided Under Separate Cover

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
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**ATTACHMENT 5 – SITE-SPECIFIC EROSION CONTROL MEASURES AND
MAINTENANCE REQUIREMENTS WITHIN 15 FEET OF A WATERBODY**

Provided Under Separate Cover

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
Docket No. CP25-60-000**

**Responses to FERC Office of Energy Projects Environmental Information Request 4
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ATTACHMENT 6 – UPDATED CONSTRUCTION PLAN (APPENDIX 1-G) REDLINES

Provided Under Separate Cover

**Mountain Valley Pipeline, LLC
MVP Southgate Amendment Project
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**Responses to FERC Office of Energy Projects Environmental Information Request 4
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ATTACHMENT 7 – UPDATED CONSTRUCTION PLANS (APPENDIX 1-G)

Provided Under Separate Cover

**Mountain Valley Pipeline, LLC
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ATTACHMENT 8 – UPDATED AGENCY CORRESPONDENCE (APPENDIX 1-I)

Provided Under Separate Cover

**Mountain Valley Pipeline, LLC
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**Responses to FERC Office of Energy Projects Environmental Information Request 4
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ATTACHMENT 9 – SELECTED ALIGNMENT SHEET REVISIONS

Provided Under Separate Cover

VERIFICATION

Pursuant to Rule 2005 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.2005, James Sabol, being duly sworn, upon his oath says that he is Project Manager; that he has read and is familiar with the foregoing updated response to the Commission’s August 25, 2025 data request; that the contents of the response are true and correct to the best of his knowledge, information and belief; and that he has full power and authority to prepare the response and execute this verification.

Signed by:

Jim Sabol

336CC45AD66E44B

James Sabol
Project Manager