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April 22, 2024

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

RE: Mountain Valley Pipeline, LLC  
Docket Nos. CP16-10-000, CP19-477-000, and CP21-57-000  
Request to Place Project Facilities In Service

Dear Acting Secretary Reese:

On October 13, 2017, the Federal Energy Regulatory Commission issued an order granting a Certificate of Public Convenience and Necessity to Mountain Valley Pipeline, LLC for the Mountain Valley Pipeline Project.<sup>1</sup> On June 3, 2023, President Biden signed into law the Fiscal Responsibility Act of 2023.<sup>2</sup> Section 324 of the Act, entitled “Expediting Completion of the Mountain Valley Pipeline,” ratifies and approves all authorizations necessary for the construction and initial operation at full capacity of the Project and directs the relevant agencies to maintain those authorizations.<sup>3</sup> On June 28, 2023, the Commission issued an Order Authorizing All Construction Activities.<sup>4</sup> Construction resumed in summer 2023, and the Project facilities are now nearing completion and will be ready for service in May.

Pursuant to Environmental Condition No. 10 of the Certificate Order, Mountain Valley requests that the Director of the Office of Energy Projects grant authorization for Mountain Valley to place the Project facilities in service.<sup>5</sup> As demonstrated herein, rehabilitation and restoration of areas affected by the Project are proceeding satisfactorily. Mountain Valley respectfully requests

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<sup>1</sup> *Mountain Valley Pipeline, LLC*, 161 FERC ¶ 61,043 (2017), *order on reh’g*, 163 FERC ¶ 61,197 (2018), *aff’d sub. nom.*, *Appalachian Voices v. FERC*, No. 17-1271, 2019 WL 847199 (D.C. Cir. Feb. 19, 2019) (“Certificate Order”). See also *Mountain Valley Pipeline, LLC*, 173 FERC ¶ 61,026 (2020) (extending construction deadline); *Mountain Valley Pipeline, LLC*, 180 FERC ¶ 61,117 (2022) (same); *Mountain Valley Pipeline, LLC*, 179 FERC ¶ 61,013 (2022) (amending certificate regarding crossing methods); *Mountain Valley Pipeline, LLC*, 185 FERC ¶ 61,193 (2023) (amending certificate regarding initial recourse rates). In Docket No. CP19-477-000, Mountain Valley received authorization to construct the Greene Interconnect Project facilities. As indicated in the filed construction status reports, the Greene Interconnect Project facilities are complete and will be placed into service following receipt of in-service authorization for the Mainline Project facilities. See *Mountain Valley Pipeline, LLC*, 171 FERC ¶ 61,047 (2020). Equitrans, L.P. is submitting a contemporaneous request in Docket No. CP16-13-000 to place the remaining Equitrans Expansion Project facilities in service.

<sup>2</sup> Fiscal Responsibility Act of 2023, Pub. L. No. 118-5 (2023).

<sup>3</sup> *Id.* at Sec. 324(c).

<sup>4</sup> *Mountain Valley Pipeline, LLC*, 183 FERC ¶ 61,221 (2023).

<sup>5</sup> As required by the Certificate Order, Mountain Valley will submit separate filings for implementing the tariff and transportation service agreements.

that the Director of the Office of Energy Projects issue the approval no later than **May 23, 2024**. Timely authorization is critical to allow Mountain Valley to finalize in-service preparations and Project customers to make final preparations for supplies, scheduling, and nominations, particularly the Project customers whose long-term firm contracts for the full Project capacity will become effective June 1, 2024. In support of this request, Mountain Valley provides the following information.

### **Status of Construction**

Four interconnect facilities and all three compressor stations have been constructed.<sup>6</sup> Mountain Valley has completed construction and packed the Project facilities with natural gas between the northern terminus of the Project (milepost 0.0) and the Harris compressor station (milepost 77.4). Mountain Valley has completed all waterbody and wetland crossings Project-wide. Mountain Valley expects all remaining segments to be welded by early May and all Project facilities to be mechanically complete by May 22, 2024. Mountain Valley will supplement this request as these activities are completed and will continue indicating progress in its weekly construction reports.

### **Current Restoration, Ongoing Restoration, and Restoration Plan**

Throughout construction, Mountain Valley has demonstrated its commitment to achieving final restoration of Project workspaces, as it is most protective of the environment and beneficial to landowners. Mountain Valley began the 2023 construction season with more than 169 miles of the 303-mile Project in final restoration. As of today, more than 192 miles are in final restoration. All three compressor stations and four interconnect facilities have been fully restored, and earth-disturbance permits have been closed at all West Virginia facilities. No further work remains at any of the above-ground facilities.<sup>7</sup>

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<sup>6</sup> Mountain Valley has not constructed the certificated Sherwood Interconnect in Harrison County, West Virginia, but reserves the right to construct such facilities within the existing Certificate Order extension period.

<sup>7</sup> Construction status reports filed in Docket No. CP19-477-000 for the Greene Interconnect Project reflect that all construction work is complete.

The table below indicates the final restoration status by spread:

<b>Spread</b>	<b>Pipeline Mileage</b>	<b>Percentage in Final Restoration</b>
A	34.96	98.4%
B	30.60	99.0%
C	33.22	61.3%
D	29.60	58.8%
E	26.30	81.8%
F	40.60	77.3%
G	32.20	26.8%
H	31.60	19.6%
I	44.65	50.0%

Attachment A hereto includes representative photos of restoration for the Project.<sup>8</sup> The data above and the representative photos in Attachment A demonstrate that the majority of Project areas have achieved final restoration. Mountain Valley continues to conduct restoration activities, as nine restoration-focused crews are currently working in Spreads A-C, H, I, and in the Jefferson National Forest.

Mountain Valley is submitting herewith as Attachment B a Restoration and Post-Construction Monitoring Plan (Restoration Plan) summarizing the comprehensive set of restoration and monitoring requirements that Mountain Valley will follow. The Restoration Plan is designed to inform the Commission and stakeholders as to the scope and expected timeframe for final restoration of workspaces for the Project as well as summarize resource monitoring requirements that remain for the Project under approved permits. The Restoration Plan includes detailed information regarding the restoration status of each construction spread and the anticipated full restoration timeframe broken down by spread. The Restoration Plan also includes information regarding seeding and mulching for impacted Project areas. The entire Project area is expected to be fully restored by August 2024 (depending on weather and other external factors).

Mountain Valley has satisfied the restoration standard in Environmental Condition No. 10 of the Certificate Order to be granted authorization to put the Project facilities into service. Rehabilitation and restoration of areas affected by the Project will continue to proceed as demonstrated in the Restoration Plan.

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<sup>8</sup> Videos showing final restoration are available at <https://www.mountainvalleypipeline.info/mvp-video-3-above-ground-facilities-on-the-mvp/> and <https://www.mountainvalleypipeline.info/mvp-video-2-completing-full-restoration-of-river-and-road-crossings/> and were filed on the Project docket in December 2021 (Accession No. 20211214-5206).

**Identification Of Agency-Issued Non-Compliance Reports**

Mountain Valley has included agency-issued non-compliance reports and its responses thereto in its filed construction status reports. In addition, Mountain Valley is in the process of addressing a non-compliance report to be issued following a rain event in the Jefferson National Forest on April 11-12, 2024, and will include relevant information in its weekly reports.

**Identification Of Landowner Complaints**

Mountain Valley’s construction status reports include the status of outstanding landowner complaints. Mountain Valley will continue to monitor landowner complaints and include in subsequent reports.

**Compliance With Other Agency Requirements**

On October 3, 2023, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Consent Order incorporating the terms of a Consent Agreement entered into by PHMSA and Equitrans Midstream as the operator of the Mountain Valley Pipeline Project.<sup>9</sup> Mountain Valley has satisfied all aspects of Section 17 of the Consent Agreement Project-wide. For Spreads A-F, Mountain Valley has satisfied all aspects of Sections 16 and 19(A) of the Consent Agreement. The table below includes the status of required measures for Spreads G-I.

<b>Spread</b>	<b>Section 16 of Consent Agreement (% of required mileage, all measures complete)</b>	<b>Section 19(A) of Consent Agreement (% of required mileage, all measures complete)</b>
G	24%	0%
H	50%	30%
I	47%	100%

Mountain Valley will notify the Commission when it has satisfied all aspects of the Consent Agreement that are necessary to commission the remaining segments.

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<sup>9</sup> The Consent Agreement is available in the Project dockets. See Accession No. 20231003-5176. PHMSA entered into the Consent Agreement with Equitrans Midstream as the operator of the Project. In a subsequent letter to PHMSA, Mountain Valley acknowledged it is subject to the terms of the Consent Agreement.

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Mountain Valley wishes to express its sincere appreciation for the dedicated work of the Commission Staff in reviewing the Project and monitoring construction. The Mountain Valley Pipeline is a critical infrastructure project that is essential for our nation's energy security, consumer affordability, and the ability to effectively transition to a lower-carbon future, and we look forward to bringing the Project into service.

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

Respectfully submitted,

Mountain Valley Pipeline, LLC  
by and through its operator,  
EQM Gathering Opco, LLC

By: 

Matthew Eggerding  
Deputy General Counsel

Attachments

Cc: Chairman Willie L. Phillips  
Commissioner Allison Clements  
Commissioner Mark C. Christie  
Terry Turpin, FERC OEP  
Shannon Jones, FERC OEP  
Jim Martin, FERC OEP  
Paul Friedman, FERC OEP  
Jenny Fink, FERC OEP  
Sally Spencer, BLM  
William Harris, BLM