



File Code: 2720; 1900
Date: November 5, 2015

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St., N.E., Room 1A
Washington, DC 20426

Dear Ms. Bose:

Subject: Comments Regarding Soils Surveys Conducted to Date
OEP/DG2E/Gas 4
Atlantic Coast Pipeline, LLC
Docket No. PF15-554

The Forest Service submits information concerning the soil surveys conducted by Atlantic Coast Pipeline, LLC (ACP) and/or its consultants for the Atlantic Coast Pipeline (ACP) Project (Docket No. PF15-554). The proposed project would cross National Forest System (NFS) lands in West Virginia and Virginia.

Though the Forest Service has not yet received final reports of soils surveys, information has come to our attention that discredits the results of any soils surveys conducted to date while also showing ACP failed to implement the Forest Service's protocols for surveys and requirements for qualifications of field personnel. Supporting information is detailed in the attachment to this letter which details a timeline of communications with ACP and its consultants, showing that the Forest Service provided protocol for the soils surveys and required qualifications of field personnel as early as February 23, 2015. The Forest Service continued to engage ACP in numerous discussions about soils surveys through the spring and summer, and again provided the protocol and required qualifications on October 2, 2015. ACP was undiligent in following the Forest Service's protocols and responding to the Forest Service's requests to review qualifications of field personnel. The attachment also shows that ACP and/or its consultants misrepresented who conducted the soils surveys.

In summary, the Forest Service cannot use the results of these soils surveys to evaluate project effects on NFS lands. Furthermore, the Forest Service recommends the Federal Energy Regulatory Commission (FERC) not utilize data from soils surveys conducted to date on NFS lands in the preparation of the environmental impact statement. We remain concerned that ACP identified its preferred route and filed an application with the FERC without first completing the soils and geology surveys. Results of soils and geology surveys should be considered in the process of route selection.



For questions or discussions, please contact Jennifer Adams, Special Project Coordinator, by phone at (540) 265-5114 or by email at jenniferpadams@fs.fed.us.

Sincerely,

A handwritten signature in blue ink that reads "Clyde Thompson". The signature is written in a cursive style with a large initial "C" and a distinct "Thompson" ending.

CLYDE THOMPSON
Forest Supervisor

**DOCUMENTATION PROVIDED BY THE FOREST SERVICE TO REJECT RESULTS OF SOILS SURVEYS CONDUCTED TO DATE
Atlantic Coast Pipeline Project (Docket No. CP15-554)**

This document develops a record and timeline of conversations held with Atlantic Coast Pipeline, LLC (ACP) and its contractors regarding the soils surveys conducted by ACP for the proposed Atlantic Coast Pipeline Project (ACP Project) that would cross the Monongahela National Forest (MNF) and George Washington Jefferson National Forests (GWJNF). This document includes information that is the basis for rejecting the results of ACP's soils surveys conducted to date, based on the disregard for the Forest Service's required protocol and qualifications for field personnel. More specifically, ACP failed to 1) follow the Forest Service's protocol; 2) select a qualified consultant as suggested by the Forest Service; and 3) allow the Forest Service to review resumes. ACP knowingly started soils surveys before the completion of the meeting with the Forest Service to discuss the proposed field methods thus showing that the Forest Service's comments and protocols were not implemented at the start of the soils surveys. ACP failed to provide resumes to the Forest Service for review despite numerous requests by the Forest Service. ACP also misrepresented the resume of one field personnel and falsely attributed survey results to qualified field personnel, and misrepresented the Forest Service's requirements for protocols and qualifications of field personnel to its consultants, as identified by the person whose resume was misrepresented.

1. December 17, 2014—Stephanie Connolly, MNF Forest Soil Scientist, provided input to Todd Hess, MNF Realty Specialist/Special Use Manager. The input became the protocols and professional qualifications required for field personnel; the input became the document that has been provided to ACP and its consultants several times beginning on February 23, 2015. (See the protocols and professional qualifications required for field personnel in Appendix 1.)
2. February 20, 2015—Andrea Thornton, Natural Resources Group (NRG), contacted Stephanie Connolly, MNF Forest Soil Scientist, via email. (See the email string under item 3 below).
3. February 23, 2015—Ms. Connolly, MNF Forest Soil Scientist, provided the protocol for the surveys and professional qualifications required for field personnel as outlined in item 1 above.

From: Connolly, Stephanie -FS
Sent: Monday, February 23, 2015 10:02 AM
To: Andrea Thornton
Subject: RE: Atlantic Coast Pipeline Project

Andrea – Thank you for contacting me and thank you for the conversation. I am currently moving the request to share my input with your company. As soon as I have a response, I will follow up.



Stephanie J. Connolly
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From: Andrea Thornton [<mailto:andrea.thornton@nrg-llc.com>]
Sent: Friday, February 20, 2015 6:29 PM

To: Connolly, Stephanie -FS
Subject: Atlantic Coast Pipeline Project

Good Afternoon,

My name is Andrea Thornton and I work for Natural Resource Group. We are working on the FERC Application for the Atlantic Coast Pipeline Project. I was given your contact information from our project manager via Kent Karriker to discuss any potential soils resource concerns you may have in regards to the project. We are currently using SSURGO data for our soils analysis. Please let me know if you think this data is adequate for the Monongahela National Forest, or if you have a forest specific data set that we would be able to use.

Thanks and I look forward to working with you.

-Andrea



Andrea Thornton
andrea.thornton@nrg-llc.com
 (503) 525-5159
 Direct
 (503) 459-6864 Cell
 (503) 525-5155 Fax

From: Connolly, Stephanie -FS
Sent: Monday, February 23, 2015 10:53 AM
To: 'Andrea Thornton'
Subject: RE: Atlantic Coast Pipeline Project

Andrea - I have received permission to share this document with you.



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From: Andrea Thornton [<mailto:andrea.thornton@nrg-llc.com>]
Sent: Friday, February 20, 2015 6:29 PM
To: Connolly, Stephanie -FS
Subject: Atlantic Coast Pipeline Project

Good Afternoon,

My name is Andrea Thornton and I work for Natural Resource Group. We are working on the FERC Application for the Atlantic Coast Pipeline Project. I was given your contact information from our project manager via Kent Karriker to discuss any potential soils resource concerns you may have in regards to the project. We are currently using SSURGO data for our soils analysis. Please let me know if you think this data is adequate for the Monongahela National Forest, or if you have a forest specific data set that we would be able to use.

Thanks and I look forward to working with you.

-Andrea




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4. February 27, 2015—Via email, NRG acknowledged receipt of protocol and qualifications of field personnel, as outlined in item 1 above. NRG responded with questions. (See email string under item 5 below.)
5. March 3, 2015—Ms. Connolly, MNF Forest Soil Scientist, provided clarification to Ms. Thornton, NRG, via email regarding the context and sampling requirements for the Order 1 Soil Survey.

From: Connolly, Stephanie -FS
Sent: Tuesday, March 03, 2015 12:34 PM
To: Andrea Thornton
Subject: RE: Atlantic Coast Pipeline Project

Please see my responses below:



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From: Andrea Thornton [<mailto:andrea.thornton@nrg-llc.com>]
Sent: Friday, February 27, 2015 1:30 PM
To: Connolly, Stephanie -FS
Subject: RE: Atlantic Coast Pipeline Project

Hi Stephanie,

Thank you for passing along this guidance document and taking the time to speak with me earlier this week. I have a couple of questions regarding the data collection for the order 1 survey and available forest soils data.

- 1- Would the survey be required for the entire crossing of the MNF, or are there specific areas of concern that could be focused on for the carbon stocks and soil chemistry assessments for base poor soils?

The initial assessment would be required for the entire crossing of the MNF as defined by the area that ACP has selected as the boundary. As a result of that initial assessment, ACP would determine where soil disturbance would occur as this is where the soil resource would be affected; however if there are indirect effects from activities that need to account for the soil resource upslope or downslope of that activity then that information needs to be accounted for as well – such as slope, slippage potential, hydrology, etc.

The soil chemistry question is really limited to nutrient poor soils that are at moderate to high risk from disturbance. This issue is governed by the geochemistry of the geology. Therefore, identifying those geologies up front could limit the need for where the soil chemistry assessments are conducted. Do you need protocols for assessing this? We use tradition soil sampling techniques as described by USDA –NRCS Soil Survey and the University of Maine Soil Testing Lab Forest Soils Protocols. It is key that the methods be for forest soils and not agricultural soils.

- 2- You mentioned on the phone that the forest is in the process of updating/creating a soils layer but that it will not be available for us to use in our analysis. Is this because it is incomplete or only in hard copy format? **No this is because it has not been posted to USDA-NRCS Web Soil Survey which is the legal access point for all soils data for official soil survey reports. Therefore, you will have to work with USDA-NRCS to determine if the soils layer you obtain for the corridor that ACP has highlighted is the most current information. This information is only available at the level 2 order soil survey at a scale of 1:24,000. You will need a level 1 soil survey to provide soils information that can be used for a site specific analysis for proposed soil disturbing activities to adequately discuss the anticipated effects from such disturbances. If we are unable to have access to the actual mapping, are there map unit descriptions and interpretations that we would be able to review? You certainly can start with reviewing the current map unit descriptions and interpretations provided by the Web Soil Survey tools. However, because of scale – the map units will not capture the inclusions. It is these inclusions that a level 1 soil survey would capture. Map units often describe what possible inclusions may exist but do not capture site specific concerns like seeps, wet soils, soils that are already slipping, soils that may have folistic epipedons and have inclusions of spodic properties which would act as carbon sinks, etc...**

I'm going to be traveling for work a lot in the coming weeks and will best reached by email.

Thanks again for your assistance,

Andrea

Andrea Thornton
andrea.thornton@nrg-llc.com
 (503) 525-5159 Direct
 (503) 459-6864 Cell
 (503) 525-5155 Fax

6. April 6 and April 10, 2015—Ms. Connolly, MNF Forest Soil Scientist, communicated via email regarding a teleconference on April 29, 2015 with Steve Holden, NRG.

From: Andrea Thornton [andrea.thornton@nrg-llc.com]
Sent: Friday, April 10, 2015 12:36 PM
To: Connolly, Stephanie -FS
Cc: Steve Holden
Subject: RE: Atlantic Coast Pipeline Project

Hi Stephanie,

Thanks for your reply. The 29th will work for both of us. I'm located in our Portland Oregon office so anytime after 10:30 am Eastern Time will work.

Thanks for fitting us into your busy schedule!

-Andrea

Andrea Thornton
andrea.thornton@nrg-llc.com
 (503) 525-5159 Direct
 (503) 459-6864 Cell
 (503) 525-5155 Fax

From: Connolly, Stephanie -FS [<mailto:sconnolly@fs.fed.us>]
Sent: Friday, April 10, 2015 8:47 AM
To: Andrea Thornton
Cc: Steve Holden
Subject: RE: Atlantic Coast Pipeline Project

Andrea - I have been on leave this week and only periodically checking email. I am not available today or next wee through Wednesday to discuss the Pipeline project and soil survey needs. I may be able to schedule something Thursday 16th but am waiting on the availability and follow up needs from a prior scheduled project. My first date of full availability will be the 21st. Then again from the 27-30th. I can schedule something for the morning of the 21st or the afternoon of the 27th and any time on the 28 or 29th. My calendar fills very fast so a quick reply will ensure we can set a date.

Thank you,

Stephanie J. Connolly
 Forest Soil Scientist
 Monongahela National Forest
 200 Sycamore Street
 Elkins, WV 26241
 (304) 636 - 1800 ext. 244
sconnolly@fs.fed.us

From: Andrea Thornton [andrea.thornton@nrg-llc.com]
Sent: Monday, April 06, 2015 11:48 AM
To: Connolly, Stephanie -FS
Cc: Steve Holden
Subject: Atlantic Coast Pipeline Project

Hi Stephanie,

Thank you for your responses to my questions back in March. Do you have any availability this week to have a call with myself and Steve Holden (another NRG soils resource specialist) to continue our discussion about the soils survey on the forest? Please let me know if there is a day/time that works best for you.

Thanks again,
 Andrea



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7. April 22, 2015—MNF issued a special use permit (SUP) authorizing ACP to conduct surveys along proposed routes crossing the MNF. A document attached to the SUP, *Recommended Environmental Resource Surveys for Proposed Atlantic Coast Pipeline Routes*, dated April 21, 2015, contained protocol and required qualifications for field personnel for surveys of various resources including soils. The requirements for the soils surveys specify that surveys must meet the requirements of an order 1 soils survey and be conducted by a professional journey level soil scientist with experience in the Appalachian Region. (Please see page 32 of *Recommended Environmental Resource Surveys for Proposed Atlantic Coast Pipeline Routes* in Appendix 2.)
8. April 29, 2015—Ms. Thornton and Mr. Holden of NRG held a conference call with Ms. Connolly, MNF Forest Soil Scientist, lasting about an hour. Discussion items included protocols for an Order 1 level soil survey, timing of the surveys, requirements for sampling, the appropriate methods and labs to be used, and the rugged nature of the terrain. Qualifications of field personnel were specifically discussed. In addition, Ms. Connolly offered NRCS as a resource given the soil survey updates that had recently occurred in the area. (See below for proof of Ms. Connolly's acceptance of the meeting.)

From: Connolly, Stephanie -FS
 Sent: Wednesday, April 29, 2015 9:18 AM
 To: Andrea Thornton
 Subject: Accepted: ACP Soil Survey Call
 When: Wednesday, April 29, 2015 10:30 AM-12:00 PM.
 Where:

9. May 27, 2015—Ms. Connolly, MNF Forest Soil Scientist, emailed NRG at NRG's request to provide a list of suitable contractors known to be qualified to conduct soils surveys in the region. Ms. Connolly copied Tom Bailey, GWJNF Forest Soil Scientists.

From: Connolly, Stephanie -FS
Sent: Wednesday, May 27, 2015 10:45 AM
To: Andrea Thornton
Cc: Bailey, Thomas -FS
Subject: RE: Atlantic Coast Pipeline Project - local contractors for soil surveys

Andrea – I finally was able to track down a local contractor that you could possibly work with in the region to help you with the soil survey portion of this ACP project. This is the Nicholas Putnam Group. I know these individuals to provide quality and reliable work.

Please contact Steve Carpenter and or Charles Delp at:
<http://www.npgsoils.com/Contact-Us.html>

Looking into the WVAPSS website is also a way to find local contractors as well as through Virginia soil science society websites.

Disclaimer: This response does not represent an official USFS endorsement or solicitation for services of the companies listed above.



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10. July 7, 2015—The Forest Service met with ACP to discuss various aspects of the proposed ACP Project. Of notable conversation during this meeting was discussion of the soil surveys that had not yet been started. Bob Orndorff and Bill Scarpinato of ACP told the Forest Service that a geotechnical firm would be handling the soil surveys rather than NRG. Ms. Connolly, MNF Forest Soil Scientist, asked about credentials. Following the meeting, Mr. Orndorff reassured Ms. Connolly that the Forest Service that resumes would be provided for review prior to selection. He also confirmed that the credentials of contractors conducting various other surveys had been provided to the Forest Service for review and approval, and stated he understood the Forest Service's concern about understudies and interns that had been used to develop portions of resource reports that were less than adequate. (See meeting notes provided in Appendix 3.)
11. July 14, 2015—Colin Olness contacted Ms. Connolly, MNF Forest Soil Scientist, to discuss the soils survey. Ms. Connolly informed Mr. Olness in this conversation that Mr. Orndorff had said on July 7, 2015 the Forest Service would be able to review resumes prior to the selection of the subcontractor for the soil survey. Mr. Olness informed Ms. Connolly that the selection of the contractor and field personnel had already been made. Ms. Connolly requested to see the resumes of the company and the professionals selected to conduct the work. Mr. Olness replied that he would submit those resumes within a week's time. However, Mr. Olness did not follow up on his commitment to provide this documentation, as discussed below.

From: Colin P Olness (Energy - 2) [<mailto:Colin.P.Olness@dom.com>]
Sent: Tuesday, July 14, 2015 3:47 PM
To: Connolly, Stephanie -FS
Cc: Spencer Trichell; Sandra H Williams (Services - 6); William A Scarpinato (Services - 6); andrea.thornton@nrq-llc.com; Steve Holden
Subject: ACP: Contact information, Colin Olness

Stephanie,

Thanks for taking my phone call this afternoon. Attached is my vCard as discussed. Moving forward if you have any questions or concerns regarding the soils surveys please contact me.

We appreciate your concerns and look forward to receiving your comments on the resource reports.

Thanks again

Colin Olness, PE

Contractor
Atlantic Coast Pipeline - Construction
99 Edmiston Way
Buckhannon, WV 26201
(C) 304.203.9011
Colin.P.Olness@dom.com

12. July 14 and July 15, 2015—Jennifer Adams, Forest Service Special Project Coordinator, and Mr. Olness, ACP consultant communicated regarding upcoming soil meetings. Ms. Adams informed Mr. Olness of the Forest Service's preference to conduct meetings for both forests at the same time.

Colin,

I'm sorry that I missed your call.

Thank you very much for communicating with us regarding the anticipated soil surveys on the GWJNF. Please contact me on all communications with Tom Bailey at the GWJNF.

Stephanie Connelly informed me that you contacted her as well. Please be advised that there is a Memorandum of Understanding (MOU) between the MNF and the GWJNF, and as the coordinator of the projects for both forests, I need to be aware of all communications to both forests. Therefore, please copy me, and also Kent Karriker, on communications to Stephanie.

Due to the MOU, it may be very helpful for any coordination meeting to involve both forests at the same time.

Thank you again,
Jennifer



Jennifer P. Adams
Special Project Coordinator

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From: Colin P Olness (Energy - 2) [<mailto:Colin.P.Olness@dom.com>]
Sent: Tuesday, July 14, 2015 4:07 PM
To: Adams, Jennifer - FS
Cc: Spencer Trichell; andrea.thornton@nrg-llc.com; William A Scarpinato (Services - 6); Sandra H Williams (Services - 6)
Subject: ACP: Soil Survey Contact information, Colin Olness

Jennifer,

I left you a message to introduce myself and let you know to contact me with any questions regarding the soil survey in the GWNF. This program will be kicking off very soon and we will schedule a coordination meeting with you and your team. I spoke with Thomas Bailey earlier as an introduction.

My contact information is attached. Please contact me if you have any questions or concerns.

Thank you

Colin Olness, PE

Contractor

Atlantic Coast Pipeline - Construction

99 Edmiston Way

Buckhannon, WV 26201

(C) 304.203.9011

Colin.P.Olness@dom.com

13. June 30, 2015—During a meeting with ACP, Ms. Adams asked ACP and its consultants when the soil surveys would be conducted. Ms. Adams and Mr. Karriker expressed concern over the soils surveys being conducted post-filing rather than pre-filing. (See the meeting notes provided in Appendix 4.)

14. August 20, 2015—Colin Olness requested a soil survey kickoff meeting with the Forest Service.

Jennifer,

I wanted to follow my voice message with an email. We would like to coordinate a date for the kickoff meeting and soil surveys in the near future. Prior to that I would like to review a draft agenda, list of attendees, preferred location and proposed schedule with you. Please give me a call (contact information below) to discuss.

We are looking forward to starting this effort.

Colin Olness, PE

Contractor

Atlantic Coast Pipeline - Construction

99 Edmiston Way

Buckhannon, WV 26201

(C) 304.203.9011

Colin.P.Olness@dom.com

15. August 21, 2015—Stephanie Connolly, MNF Forest Soil Scientist, emailed ACP and/or its consultants to express concern about the date for conducting soil surveys. See the email excerpt below.

ACP/Dominion – It is very late in the season to be starting your soil surveys here on the Monongahela National Forest. Our request for this work was that it be done this field season when the soils are saturated. There was no better time than May June and July when the Forest received 24 inches of rain in those three months to see the maximum expression of how the soils respond during wet weather. Not only is a soil survey required but also a mapping of specific sensitivities like hydric soils, wet soils, soils prone to slippage, etc. I had asked on several occasions to have these types of conversations about the details and planning early on and got little to no response or follow up from those conversations. We started the initial conversations back in April and there were intentions set to start this work along with the other surveys. Also I had provided a list of potential subcontractors that could be used for this work and it has come to my attention that this list was not used. In addition to this, I was also told that I would have a chance to at least review the potential list of contractors selected for this work at the June meeting in Elkins by Mr. Orndorff. This too was found to be untrue given that the contractor has already been selected. The specialized skill and requirements needed to conduct this Order 1 level soil survey are specific to those who have skills within the Appalachian Region and it is imperative that a certified professional soil scientist head this survey work.

The need for this inventory is very apparent when reviewing the current Chapter 7 and Chapter 6 resource reports. Much of this information is not site specific and lacking in detail to be able to be used for effects analysis or design. The slope analyses is completely unacceptable and very elementary at best. We have provided extensive comments pointing out the flaws and misinformation used in the reports, and this is mostly due to scale and a lack of understanding of the soil resource by the author.

I now will be out of the office until September 14th. Upon return I have a commitment to already scheduled higher priority projects. My schedule becomes free October 14. At that time I will be able to schedule a meeting and it should involve soils, geology and watershed so that a comprehensive understanding of what is needed for data collection is heard by the company from all resources involved.



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16. August 25, 2015—Ms. Adams, responded to Mr. Olness's request for a meeting with a time period where staff would be available for meeting. Ms. Adams reiterated that Mr. Orndorff told the Forest that we would be able to review the potential list of contractors selected for this work. It was then reiterated that a specialized skill set is needed to conduct this work and that local knowledge is needed. See the email excerpt below.

We were told by Mr. Orndorff on July 7 at the meeting held at the WV DNR that Stephanie could have a chance to at least review the potential list of contractors selected for this work. The specialized skill and requirements needed to conduct this Order 1 level soil survey are specific to those who have skills within the Appalachian Region and it is imperative that a certified professional soil scientist head this survey work. We would like to have that opportunity.

I'll be in touch with Bill and you this week.

Thank you,
 Jennifer



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17. September 24, 2015—ACP and its consultants emailed the presentation containing its proposed methods for conducting soils surveys. The company notified the Forest that they intended to start on October 3, 2015 following a meeting to discuss methods on October 2, 2015. The timeframe estimated by ACP and/or its consultants for completing soils surveys was two to three weeks. As subsequently shown, field work actually began on October 2, 2015, such that the Forest Service's comments and protocols discussed on October 2 could not have been

incorporated to the field work that began on October 2. Also as subsequently shown, the field work was completed in far less than the anticipated time—in an amount of time that Forest Service soil scientists indicate is questionable.

Jennifer,

Attached is a presentation (draft) of the proposed survey program for your information. We will review this during our meeting scheduled for 10/2. We intend to begin soil surveys 10/3/15. Our crews will be on site for an internal briefing on 10/2.

The crews anticipate roughly two to three weeks of field work to collect the samples. We've allowed for some contingency time to account for the inevitable unforeseen challenges.

I will attend next weeks meeting to answer any other questions.

Thanks for your help.

Colin Olness, PE

Contractor

Atlantic Coast Pipeline - Construction

99 Edmiston Way

Buckhannon, WV 26201

(C) 304.203.9011

Colin.P.Olness@dom.com

18. September 24, 2015—Ms. Adams acknowledged the email and alerts the company that the Forest Service will review the draft to ensure the proposed methods meet Forest Service's needs.

Colin,

Thank you for providing your proposed draft for the soil surveys. The Forest Service soil scientists will review and edit the draft to ensure the proposed methods meet the Forest Service's needs.

Thank you,
Jennifer



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19. October 2, 2015—Meeting held between ACP and its consultants with Monongahela National Forest and George Washington Jefferson National Forest to discuss ACP's proposed methods for conducting soils surveys. The Forest Service provided written comments on ACP's proposed methods. Additionally, the Forest Service provided comments on the meeting notes to ACP following the meeting. (See Appendix 5).
20. October 6, 2015—Ms. Adams emailed Mr. Scarpinato of ACP and ACP's consultants requesting resumes and reminding that ACP informed the Forest Service on July 7, 2015 that resumes would be provided for review. See the email excerpt below.

On the day of the meeting you mentioned that resumes will be available for review on October 16, but you also said surveys began on the day of the meeting. Given Dominion told us on July 7, 2015, and also during a subsequent conversation between Colin and Stephanie, that we could review resumes, we'd like to receive those resumes as soon as possible. As I told NRG on a call about small mammal surveys, we have to be comfortable in briefing management about study results. Because the results are a function of the methods and the field personnel, it's imperative that we review the resumes as soon as possible to ensure qualified personnel are conducting the surveys.

Also, I've not yet been notified in writing or by phone, per the communication protocol, about where and when the studies are being conducted. I appreciate your attention to this matter.

We appreciate you recognizing the FS requirements for soils surveys on NFS lands. Our requirements are a result of the expertise based and extensive experience of the FS soil scientists with forest soils. Tom Bailey has been working on and studying forest soils for 35 years for the FS, in addition to his experience with non-forest soils in the private industry before coming to the FS. Stephanie Connolly has established her career with the FS working on forest soils, her expertise and knowledge of all soils is demonstrated by her recent accomplishments as a coach for the USA Soils Judging Team. In September, the USA Soils Judging Team won the international soils judging contest held in Hungary. The graduate student working under Stephanie placed 7th in the world in the individual contest. They competed against countries that had professional soil scientists on the teams. Therefore, while the FS requirements for FS soils surveys may be more stringent than the requirements for soil surveys on private lands, we're confident in the methods and logic behind the FS's requests.

Thank you,
Jennifer



Jennifer P. Adams
Special Project Coordinator

Forest Service
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21. October 6, 2015—Ms. Adams emailed Mr. Scarpinato of ACP informing him that ACP did not comply with the Forest Service's requirements regarding protocol and qualifications of field personnel. See the email excerpt below.

Bill,

Immediately after I sent my original email below, I received another email from USFS soil scientists which essentially reiterated my concerns stated in my previous email. I'll provide the paragraph below.

ACP Dominion did not comply with the initial USFS requirement in the special use permit to provide resumes and documentation of qualifications of the soil survey contractor conducting soil surveys prior to starting the work; and ACP directed that contractor to start the surveys without any consultation with the USFS.

GEOSYNTEC is delaying the submission of the current contractors qualifications for more than 2 weeks (October 16th, 2015) while the contractor has already started work and will be working in the field on the forest. Therefore, it is assumed by the USFS that the contractors actually gathering the data in the field may not actually have soil science degrees and may not have any regional soil characterization experience. Without having reviewed resumes of field personnel, we have no assurance about quality control or quality assurance of data currently being collected.

Please notify us in writing whether or not surveys are currently being conducted in the field, including the date the surveys began, keeping in mind Colin said e surveys began on the day of our meeting (October 2). Please also indicate the location of the survey crew, and please remind the crew about the communication protocol.

Please be advised that data collected prior to the FS's approval of resumes of field personnel may not be acceptable.

I look forward to promptly receiving resumes of soils personnel.

Jennifer



Jennifer P. Adams
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22. October 9, 2015—ACP's consultant emailed Ms. Adams in response to her October 6, 2016 email. See the email excerpt below. In item 23 below, the Forest Service refutes some statements made by Mr. Olness in his October 9 email.

We'd also like to thank you and your team for meeting with us and understand the challenges of coordinating schedules to get everyone together. Meetings minutes / notes are being prepared and reviewed internally and will be made available.

As requested below is the schedule of work for the Order 1 soil surveys currently under way.

Date	Task
10/02 – Friday	H&S Meeting, Crews begin sampling on MNF
10/03 – Saturday	MNF Sampling (cont'd)
10/04 – Sunday	MNF Sampling (cont'd)
10/05 – Monday	MNF Sampling (cont'd)
10/06 – Tuesday	Crews begin sampling on GWNF
10/07 – Wednesday	GWNF Sampling (cont'd)
10/08 – Thursday	GWNF Sampling (cont'd)
10/09 – Friday	GWNF Sampling (cont'd)
10/10 – Saturday	Crews complete soil sampling

The field crew is conducting the order 1 survey per the NRCS protocol. The request for resumes is noted and these will be provided as discussed. Geosyntec is not delaying the submittal of the resumes. I will apologize to Stephanie for the miscommunication on my part. Geosyntec is in the field and will provide these as soon as they are able.

The geohazard survey program is set to begin 11/4/15. We request a meeting 11/3/15 in order to brief your team on the geohazard field program.

Thanks again for the meeting and we look forward to meeting with you and your team on the 3rd.

Colin Olness, PE

Contractor

Atlantic Coast Pipeline - Construction

99 Edmiston Way

Buckhannon, WV 26201

(C) 304.203.9011

Colin.P.Olness@dom.com

23. Regarding item 22 above, the Forest Service notes the following inaccurate information provided by Mr. Olness in his email, as shown by the timeline and other comments made by Mr. Olness.
- 1) Mr. Olness in a previous email stated that it would take the company two to three weeks and possible longer to complete the soil surveys. – The company completed the surveys in less than ten days.
 - 2) Mr. Olness says that Geosyntec is not delaying the delivery of resumes. Documentation to be provided in this record will show that indeed resumes were delayed intentionally.
 - 3) Mr. Olness assures the Forest Service that an Order 1 soil survey is being performed to Forest Service standards and NRCS standards. Again documentation will be provided that this was not the case.
 - 4) Note that the schedule was provided to the Forest Service after the work had already been completed; therefore, work could not be monitored in the field.
 - 5) Note that no notification of presence on Forest conducting the surveys was given to the District Rangers or Forests in general.
24. October 16, 2015—Kent Karriker, MNF Ecosystems Group Leader, emailed ACP and its consultants to document concerns with the progress of the soil surveys on National Forest System lands.

Bill, Spencer, and Colin,

Please send an immediate update on the progress of soil surveys on National Forest land. The schedule that you provided on 10/9/15 suggested that most work had already been conducted by that time, and that the surveys would be completed by 10/10/15. Based on this schedule, we are concerned about several things:

- Survey work was conducted without proper notification to the appropriate Forest Service contacts of the location, nature, and timing of the work. We are still awaiting such notification.
- If the work has been completed according to the schedule, we have not yet been notified.
- Survey work was conducted without providing professional qualifications of the surveyors to the Forest Service for review.
- Timing of the surveys and lack of proper notification did not allow for Forest Service inspection of the activities.
- The amount of work to be conducted in the allotted time (438 soil pits in nine days) seems unrealistic, unless a very large team of soil scientists was employed.

If soil survey work is still being conducted, please notify us of the progress, locations of completed and ongoing work (including sample locations), and projected schedule. Based on the fact that a substantial portion of the work appears to have been completed prior to Forest Service review of qualifications, we may need to check specific sample locations to verify soil descriptions.

We also reiterate our request that the professional qualifications of the soil surveyors be provided for our review.

Thank you,



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25. October 16, 2015—Mr. Olness, ACP's contractor, responded to Mr. Karriker's email and provided resumes for the Forest Service's review. In the email, ACP's contractor verified that they did not use proper communication protocols as previously agreed to with Ms. Adams. The company confirmed that it conducted an order 1 level soil survey done by NRCS methods, though the Forest Service later became aware that the protocol was not followed.

Kent,

Thank you for the email. We understand the concerns voiced by the FS and hope the below responses provide the clarification needed.

The Order 1 soil survey has been completed per the schedule shown below.

Date	Task
10/02 – Friday	H&S Meeting, Crews begin sampling on MNF
10/03 – Saturday	MNF Sampling (cont'd)
10/04 – Sunday	MNF Sampling (cont'd)
10/05 – Monday	MNF Sampling (cont'd)
10/06 – Tuesday	Crews begin sampling on GWNF
10/07 – Wednesday	GWNF Sampling (cont'd)
10/08 – Thursday	GWNF Sampling (cont'd)
10/09 – Friday	GWNF Sampling (cont'd)
10/10 – Saturday	Crews complete soil sampling

- Survey work was conducted without proper notification to the appropriate Forest Service contacts of the location, nature, and timing of the work. We are still awaiting such notification.
- Please accept our apologies for failing to provide the notification as requested. We will continue to coordinate the soil survey and geohazard program through the appropriate representatives.
- If the work has been completed according to the schedule, we have not yet been notified.
- The order 1 soil survey has been completed per the schedule shown.
- Soil surveys for the remainder of the geohazard program are scheduled to begin 11/2/15.
- Survey work was conducted without providing professional qualifications of the surveyors to the Forest Service for review.
- Attached to this e-mail please find the resumes for the personnel are attached.
- Timing of the surveys and lack of proper notification did not allow for Forest Service inspection of the activities.
- We appreciate the concerns voiced by the Forest Service and would like to offer the following:

Our surveyors will take the FS personnel to the field to review the actual sample locations. The team could also show them how the order 1 survey was accomplished. During this field review if the FS identifies additional locations for sampling we will be prepared at that time to do this. Please contact me to schedule there field visits.

- The amount of work to be conducted in the allotted time (438 soil pits in nine days) seems unrealistic, unless a very large team of soil scientists was employed.
- The Order 1 soil survey completed to date was conducted per the NRCS protocols.

If soil survey work is still being conducted, please notify us of the progress, locations of completed and ongoing work (including sample locations), and projected schedule. Based on the fact that a substantial portion of the work appears to have been completed prior to Forest Service review of qualifications, we may need to check specific sample locations to verify soil descriptions.

- Soil survey work for the classification portion is complete. Additional efforts are scheduled for November of this year.

Formal notification of this field work is coming and will be provided to you prior to the commencement of the surveys.

Colin Olness, PE

Contractor

Atlantic Coast Pipeline - Construction

99 Edmiston Way

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Colin.P.Olness@dom.com

26. October 16, 2015—Ms. Connolly informs that she and Mr. Bailey reviewed the resumes provided by ACP or its consultants and determined that only one of the four field personnel were qualified to conduct soil surveys. See the excerpt from Ms. Connolly's email below.

Kent/Jennifer/Ken:

Tom and I have done a precursory review of the resumes for the soil survey crew. We just discussed them on the phone and compared notes. Nan Gray is a credible professional certified soil scientist and has extensive VA soils experience and even possibly WV. The additional 3 members of the crew are not soil scientists. Some do not have more than 1 soils class but yet are claiming the ability to conduct soil characterization and soil sampling. There is some related geology experience and engineering experience which would lead to knowledge about soils and associated effects of soil disturbance however I did not see experience that would indicate the ability to conduct an Order 1 level soil survey outside of Nan Gray's resume. We both agreed that Nan Gray would not physically be able to verify the entire effort for quality control or assurance given the number of soil observations that were needed (estimated 20 soil pits per person per day - total of 438 observations) to cover the order 1 intensity. In addition Tom and I both agreed that it would not be physically possible for one soil scientist to conduct 20 soil pits or soil hole observations in one day. Both of us have extensive transect experience in the Forest(s) and know the type of effort it takes to dig a hole, describe it, describe the other items requested in the deliverables, and possibly sample that hole. We have never in our entire career seen this workload/day carried out by any soil scientist even one with 30 years mapping experience in the Appalachians. So we have serious doubt about the reality of this work actually being completed to specification and call into question that an Order 1 level soil survey field collection effort is complete as indicated in Colin Olness's response from GEOSYNTEC in today's email.

I think that if ACP Dominion is going to insist that the soil survey is complete and the work was conducted in a manner that was spelled out in the permit and reviewed in our meeting, an immediate field review needs to occur as indicated in Mr. Olness's email.

I can make myself available Monday 26th, Wednesday 28th, after 11am on the 29th. My next available dates would be Nov 6 or the 9th. I think that multiple locations would need to be verified and a review of the data sheets would also need to occur.

I look to you to decide how to most appropriately proceed with this monitoring of the already conducted soil survey work. I also am looking to you on how to respond back to ACP/Dominion GEOSYNTECT/NRC on the numerous discrepancies that are occurring with the totality of the information surrounding the soil survey for both forests.

Stephanie J. Connolly
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27. October 16, 2015—Ms. Adams emailed Leslie Hart, ACP Vice President, requesting resolution of the issues regarding soils surveys.

I'm hoping you could help me resolve some concerns and issues regarding soils surveys methods and the resumes of the field crew. We asked to review resumes of the field crew conducting the soils surveys, just as we did for other resources. Our conversations about requirements for soils surveys began last spring and continued thereafter. On July 7, 2015, during a meeting attended in part by myself, Clyde Thompson (Forest Supervisor, MNF), MNF staff, and Dominion, Bob Orndorff informed us that resumes of field crew personnel would be provided for our review. During a meeting held on October 2, 2015 and attended by NRG, Mr. Scarpinato, myself and three other Forest Service staff, we provided written and verbal input on the proposed soils surveys, based on the presentation provided in advance of the meeting (a presentation which had not taken into consideration our comments about soils made at scoping, on draft resource reports, in meetings and emails). During the October 2 meeting, when we reminded Mr. Scarpinato and Colin Olness of NRG that resumes had not yet been provided to us, Mr. Olness said that the resumes would be provided on October 16 and when prompted by Mr. Scarpinato to provide resumes sooner, Mr. Olness maintained that the resumes would not be available until October 16. During that same conversation, I asked Mr. Olness when the surveys would begin, and he said "today." Because the soils surveys began on the same day of our meeting about soils methods, we're uncertain if our input was incorporated and methods implemented in the field (and most certain our input could not have been incorporated an implemented for surveys conducted on October 2). Because the resumes were not provided for our review until after the soils surveys were completed, our concerns about the qualifications of the field crew are now realized. According to our soil scientists' review of the resumes, only one crew member is a professional soil scientist with relevant experience. The three other crew members are not professional soil scientists and their experience and education in related fields does not qualify them to conduct level 1 order soil surveys and soil characterizations. We considered the possibility that the three crew members with lesser qualifications served as assistants to the professional soil scientist, but it's unlikely that one soil scientist could conduct 20 soil pits or soil hole observations in one day, based on the knowledge and experience of our soil scientists. Thus, considerable concern has been raised about the validity and quality of the survey results. We offered our input to the soils survey methods and review of resumes in order to help Dominion obtain survey results that would meet the Forest Service's expectations and needs, and we look forward to a continued working relationship to find resolution.

Additionally, please let me know if you have any questions, need clarification about any facet of these concerns and issues of soils surveys, or if you require documentation showing our email conversations, meeting notes or our comments filed into the FERC record. As a side note, we asked to receive the meeting notes from 2-3 recent meetings including the soils meeting, for our review. We did, in fact, receive the meeting notes and I'll be sending our comments and edits on the notes next week.

Thank you for your time. I look forward to talking to you on Monday.

Jennifer



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28. October 26, 2015—Nan Gray left a voice message with Ms. Connolly asking her to return her call regarding ACP and the soil surveys. Ms. Gray is the president of Soil Works, Inc. and a licensed professional soil scientist in Virginia. Her resume was provided by Colin Olness as a person who conducted the Order 1 Level soil survey.
29. October 27, 2015—Ms. Connolly returned Ms. Gray's phone call. Below is a summary of the items discussed on the call.
- Ms. Gray introduces herself and the reason she is calling. She has informed me that she has spoken to Tom Bailey on the GWNF and was made aware that her resume was being used as a credential as to having a conducted an Order 1 Level Soil Survey for both NFs for ACP Dominion pipeline.
 - Ms. Gray stated that she had not done this and was in no way employed for this project by Dominion or any other subcontractor including GEOSYNTEC.
 - Ms. Gray stated that on October 15, a Ms. Kathleen Harrison contacted her and requested her resume for use to act as a third party reviewer of soil survey data that had been conducted on the NFs. Ms. Gray at that time agreed and said she would consider the project. She sent GEOSYNTEC her resume on October 16. (See EXHIBITS 23 and 24 documenting this information by Ms. Gray.) Ms. Gray is a highly qualified licensed professional soil scientist in Virginia with extensive experience conducting soils work in the Appalachians.
 - Ms. Gray further disclosed that Ms. Harrison has only collected 126 soil samples. (This amount of data in no way meets the requirements of an Order 1 level soil survey). In addition Ms. Harrison shared with Ms. Gray that she is not a soil scientist but rather as professional geologist. (This is verified by her resume provided by Mr. Olness, ACP's contractor).
 - Ms. Harrison asked Ms. Gray how she would have gone about collecting soil samples and data. She also inquired about where she would get nutrient sampling done and how was this done.
 - Ms. Harrison stated that the soil holes were shallow and that hand troughs were used to sample the soils. (See Appendix 5; see the meeting notes showing the Forest Service's edits provided to ACP, and review including pictures provided by the Forest Service to visualize the soil profiles that are typical within the landscape of the row as well as reference to the tools that should be used to open and sample soil pits. This was directly discussed with and provided in a written format to Mr. Scarpinato of ACP and ACP's consultants, Mr. Holden of NRG and Mr. Olness at the meeting held on October 2, 2015.)

- Given the conversation with Ms. Harrison, Ms. Gray has zero confidence in any of the samples taken for any purpose during the soil survey conducted by GEOSYNTEC.
- Ms. Harrison also stated that she did not want to use licensed soil scientists in collecting data.
- Ms. Harrison was keen to get the remaining soils sampled immediately.
- Ms. Harrison was disappointed to know Ms. Gray had called Forest Service to discuss protocols, permission to sample FS Lands, hunting season restricted field access and the ACP Forest Service Land soil survey part of the project.

In addition to the above information, Ms. Connolly and Ms. Gray discussed what an Order 1 Level Soil Survey entails, the common knowledge about the soils within the ROW and landscape, the concerns for carbon stock assessments, and the actual crew that it would take collect the data in a reasonable amount of time. They also discussed weather and access conditions. Safety issues and equipment needs.

30. October 27, 2015—Ms. Connolly replied to Ms. Gray's email. See the email excerpt below.

Thank you Ms. Gray for contacting the USFS to discuss the status of the soil survey for the portion of the ACP pipelines that cross National Forest System lands. It also was a pleasure in talking with you. I have informed my supervisors of our conversation (listed in the above email addresses) and have been asked to also document our conversation. As soon as I can take a break this afternoon I will do this and share this with your prior to my submission. Basically you have some of the most important details in your email below and I will reiterate them in my report. Also thank you for your attention to detail and good luck with your endeavors.



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31. October 27, 2015—Ms. Gray stated she has done no work for ACP or its contractors, and further states that she was contacted by ACP's contractors on October 15, 2015, following completion of the soils surveys. Her email shows she was not among the field personnel who conducted soil surveys though ACP and/or its consultants identified her resume as one of the field personnel who conducted the surveys, and actually the only personnel that the Forest Service deemed qualified. See the email below.

From: Nan Gray [<mailto:soilwork@pemt.net>]

Sent: Tuesday, October 27, 2015 11:40 AM

To: Connolly, Stephanie -FS

Subject: ACP application re soils

Good morning, Stephanie Connolly.

It was a pleasure talking with you this morning. I was contacted by Geosyntech (for the first time) 15 October 2015 and got my resume to them 16 October 2015. I have done no work of any kind for them. I have been figuring out how to perform the work Kathleen Harrison has told me needs to be done and fit it into the timeframe she dictated (to be out of the FS Lands by leaf fall and surely before the end of November...). Restricted field activities are for good reason and you mentioned 1 November to 15 December is hunting season of one kind or another, which restricts field activities. I shall convey that information for Ms. Harrison to check their special use permit.

Thank you for your attention to detail. We shall talk soon.

Best,
Nan Gray

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 POBox 3
 Newport, VA 24128
soilwork@pemtel.net
 (540) 544-7791

As always, save your soil.

32. October 27, 2015— Ms. Gray provided documentation showing that she had not been affiliated with ACP or its consultants at the time the soil surveys were completed. Therefore, though Ms. Gray's resume was provided to the Forest Service on October 16, 2015 by Mr. Olness as one of the field personnel conducting surveys, Ms. Gray showed in her email documentation that she was not present in the field and ACP or its consultants falsely identified her as field personnel who conducted the surveys. It was Ms. Gray's resume that the Forest Service identified as being the only field personnel qualified to conduct the soil surveys, but since it is now known that Ms. Gray was not among the field personnel, it is clear that no field personnel were qualified. The falsification of the qualifications of field personnel by ACP and/or its consultants is of concern to the Forest Service. See the email string below.

Hi again, Stephanie Connolly. I am forwarding this note for verification of your interpretation. The next email from Ms. Harrison asks me to not contact you directly but to go through Colin Olness of ACP.

Nobody else has heard of Geosyntech and we wonder who hired them? I do not foresee me working with them unless they straighten their act.

*Thank you for fulfilling your duties as nicely as you do.
 Best,
 Nan Gray*

From: [Kathleen Harrison](#)
Sent: 27 October, 2015 12:09 PM
To: [Nan Gray](#)
Subject: RE: ACP soils work

Nan,

Thanks for the update, I spoke with Dominion about the Nov. 1 – Dec. 15 restriction yesterday and have been informed it does not apply to their Special Use Permit; however, they are getting confirmation on this.

Dominion has obtained authorization for some of the private lands. We did not cross private lands Dominion does not have authorization to access. This will be consistent for the Order 1 Survey work. The field teams will need to walk in/out from access points that avoid private lands that Dominion does not have access agreements.

The USFS had asked Dominion provide copies of our resumes, including the resume of a soil scientist that the FS requested we obtain to provide a review of our report (this initiated our original conversation). At no point have we identified that you or your company provided input / participation on our project. We are only responding to a later request by the FS to have a certified soil scientist review our report. We had not been alerted of the requirement to have a certified soil scientist until after we had prepared our scope of work and initiated our field work. I have had no direct contact with the FS.

Let me know if you have any questions. I will let you know what I learn on the Nov. 1 assess date restrictions. I will hopefully get clarification on this today.

Regards,

Kathleen

From: Nan Gray [<mailto:soilwork@pemtel.net>]
Sent: Tuesday, October 27, 2015 8:49 AM
To: Kathleen Harrison
Subject: ACP soils work

Good morning, Kathleen Harrison.

I spoke with the Forest Service regarding their soil sampling protocols and permission to enter and sample FS Lands. Forest Service Soil Scientist Stephanie Connolly said other utilities have restricted field activities between 1 November to 15 December due to hunting season of one kind or another, which restricts field activities. Can you check your special use permit regarding restricted field activities and send me verification that field activities are unrestricted.

I shall also require copies of written permission for those private lands we shall cross to get to FS Lands.

The FS thinks I had something to do with sampling soils already. If Geosyntech has told someone that I have approved or controlled the sampling of the soils and descriptions, that is wrong. Please remove our company and my name until we agree to perform the work.

Thank you for your attention to detail. We shall talk soon.

*Best,
Nan Gray*

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33. October 27, 2015—Mr. Bailey, GWNF Forest Soil Scientist, provided the following comment in his adequacy review of ACP's resource report 7, Soil Resource Field Surveys, Ref. 7-9, 7-10. (Note: This comment will be included in the Forest Service's upcoming filing of comments on final resource reports.)

Protocols for field work to verify soil survey information on the GWNF have not been completed and what has been accomplished to date has been done by unqualified personnel using inadequate methods. Resumes sent for FS review on Oct 16 were received after soil resource fieldwork was pronounced as "completed" by ACP subcontractor. Sub stated that field work had been completed on Oct 10, 2015. GWNF contacted the only qualified person on the field crew and she said that she did not send her resume in to the subcontractor until Oct 16. She was never hired by the subcontractor, though her resume was sent to the FS as if she had been in the field since Oct 2 collecting field data. She has never collected any field data for the ACP subcontractor. It was also learned that 136 soil samples were collected for lab analysis from shallow holes in the ground dug by hand trowels. Both the number of samples collected for both National Forests and the methods used for collecting the samples are totally outside the protocols submitted to ACP and discussed in person at an Oct 2 meeting with subcontractors in Harrisonburg, VA. Misrepresentation of field crew resumes, the work and the personnel doing the work are serious reasons to question the reliability of any field data collected by ACP for the soil resource report to be submitted to the Forest Service and to the Commission and brings into question the ability of the FS to work with this ACP subcontractor.

34. October 27, 2015—Ms. Connolly, MNF Forest Soil Scientist, provided the following comment in response to Mr. Bailey's comment identified above in item 32.

S. Connolly, MNF Forest Soil Scientist concurs with the statement provided by T. Bailey above. In addition to ACP Dominion Colin Olness misrepresenting Ms. Gray and her professional connection to this process, it is also clear from the email conversations between Ms. Gray and GEOSYNTEC that Dominion did not conduct the Order 1 Level soil survey as they had already stated in several emails provided in this time line. Given the behavior of ACP Dominion and this ACP subcontractor, the Forest Soil Scientist Service is also led to question whether the other members of the crew were present in the field collecting data. (Although, in phone conversation, Ms. Gray mentioned that Ms. Harrison's daughter helped her carry field equipment. There is a resume with a second Harrison provided as part of the crew.) This behavior does draw attention to the credibility and the quality of work provided for other surveys and lead to consideration or recommendation that a thorough review be done to ensure that the data collected was done according to approved methods and that all survey crews had proper credentials. In addition quality assurance and quality control should be done in the field to verify that a second look at the area within the ROW would match with original findings by surveys.

35. November 2, 2015—Ms. Gray emailed Ms. Adams and stated she received Ms. Adams’s voice message left earlier on November 2 indicating that, with Ms. Gray’s approval, the Forest Service would document this information and file it into the FERC record. In her email, Ms. Gray provided additional information about her communications with ACP’s consultants to substantiate that Forest Service protocols were not followed. See the email excerpt below identifying parts of Ms. Gray’s conversation with ACP’s consultants.

1) During my discussion of sampling protocol with Ms. Harrison, I referenced the soil sampling protocols of the NRCS publication, "Field Book for Describing and Sampling Soils", Version 3.0, 2012, National Soil Survey Center, Natural Resource Conservation Service, USDA*

2) Ms. Harrison was unfamiliar with that standard, and so she could not tell me the differences between that and the Order 1 Forest Service protocols.

3) The sampling she told me she did was mixed every 10 inches. *That is not standard soil sampling protocol for a natural resource. Nothing about her descriptions of sampling was how soils are to be sampled.

4) Ms. Harrison dismissed soil mineralogy.

5) What started out as a Third Party Reviewer position interview, with resume to be considered for the position, turned into recognizing there were no soils data to review.

