

Dominion Energy Transmission, Inc.
707 East Main Street, Richmond, VA 23219



September 21, 2017

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

**Re: Atlantic Coast Pipeline, LLC & Dominion Energy Transmission, Inc.
Atlantic Coast Pipeline & Supply Header Projects
Docket Nos. CP15-554-000, CP15-554-001, & CP15-555-000
Supplemental Information**

Dear Secretary Bose:

On September 18, 2015, Atlantic Coast Pipeline, LLC (Atlantic) and Dominion Energy Transmission, Inc.¹ (DETI or "Dominion Energy") filed abbreviated applications (Applications), under the above referenced dockets CP15-554-000 and CP15-555-000, for the Atlantic Coast Pipeline and Supply Header Projects (Projects) pursuant to Section 7(c) of the Natural Gas Act, as amended, and Part 157 of the Rules and Regulations of the Federal Energy Regulatory Commission (Commission or FERC). Additionally, on March 14, 2016, Atlantic filed an Amendment to its pending Application, under the above referenced docket CP15-554-001.

Dominion Energy, on behalf of Atlantic and itself, hereby submits supplemental information in response to comments submitted by Western Pocahontas Properties LP and WPP LLC (WPP) in a letter dated September 14, 2017 and submitted to FERC on September 15, 2017 (Accession No. 20170915-0011).

Representatives of Atlantic and WPP have been in regular contact regarding the issues raised by WPP. These efforts have included a number of in-person meetings and written correspondence. Representatives of Atlantic believe that significant progress has been made. In its filing, WPP refers to three areas where the pipeline will have impacts on coal resources. Responses are provided below.

Blue Rock Knob Refuse Area

Refuse from the coal preparation plant is disposed of in this area. Representatives of Atlantic have designed the pipeline route to avoid the active disposal area. The pipeline skirts the fringes of the permitted area where it should have little-to-no impact on the operation.

Morgan Camp Mine

As described in WPP's filing, this area was permitted for an underground mine but has been largely inactive for approximately 20 years. It is the understanding of Representatives of Atlantic that efforts have been made recently to re-activate the area in order to commence mining activity. WPP expressed concerns about the impact of the pipeline on accessing the coal in the area where mine portals were planned. To address these concerns, Representatives of Atlantic are proposing to relocate the pipeline away from this portal area by several hundred feet. Although this proposed adjustment in the

¹ On May 12, 2017, Dominion Transmission, Inc. changed its name to Dominion Energy Transmission, Inc.

route is not as extensive as the wholesale relocation proposed by WPP in its September 14 filing, it largely eliminates the impacts on the proposed portal area. Representatives of Atlantic are of the understanding that this was favorably received by WPP.

WPP raised the prospect of subsidence in its September 14 letter. Dominion Energy has been engaged by Representatives of Atlantic to engineer and operate the Atlantic Coast Pipeline. Dominion Energy has constructed and operated numerous pipelines located throughout the Appalachian coalfields for decades, and is experienced in managing subsidence under its pipelines. There is minimal risk of subsidence damage to the pipeline, which is further mitigated if at least 50% of the coal is left in-place within the footprint of the pipeline. Representatives of Atlantic are proposing to compensate the value of coal left in-place to provide additional support that might have otherwise been mined.

Other issues raised by WPP relative to the Morgan Camp Mine include the impact of blasting for pipeline excavation and the use of coal haul roads during pipeline construction. Representatives of Atlantic expect to minimize the need for blasting during construction, particularly if there are active operations or structures nearby. Representatives of Atlantic recognize that the pipeline may have some minor impacts on coal haul roads routinely encountered in standard pipeline construction and other operations during the construction phase of the pipeline, and as such is proposing several mitigation measures. Representatives of Atlantic will repair haul roads, and address blasting concerns and other impacts, through negotiated operating parameters in a final easement or operating agreement.

Beech Mountain Mine

It is the understanding of Representatives of Atlantic that Beech Mountain Mine is not an active mining operation, but a proposed mine. The issues are similar, with the major one being the impact of subsidence on the pipeline if underground coal mining produces surface subsidence. Representatives of Atlantic are proposing to compensate for coal left in-place in order to provide support and avoid subsidence. Likewise, concerns about the effects of blasting and the impact on haul roads will be addressed in the final agreement.

To summarize, Representatives of Atlantic and WPP have spent a great deal of effort addressing the actual impacts of the pipeline on mining operations, which has led to significant progress. The proposal of Representatives of Atlantic to relocate the pipeline away from the portal area greatly reduced the potential impact on mining activity. Subsidence impacts are addressed by limiting extraction underneath the pipeline, and by compensating for the incremental coal left in-place to avoid subsidence. Representatives of Atlantic have committed to continuing these efforts to reach a mutually beneficial resolution.

If you have any questions, please contact me at 866-319-3382.

Respectfully submitted,

Angela M. Woolard

Angela M. Woolard
Regulatory and Certificates Analyst III

cc: Mr. Kevin Bowman, FERC
Service List

encl(s)/

Document Content(s)

PUBLIC_Supplemental Information_9-21-2017.PDF.....1-2