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



December 11, 2018

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 – Work in Critical Areas

Dear Secretary Bose:

By Order dated October 13, 2017, the Federal Energy Regulatory Commission (Commission or FERC) authorized Atlantic Coast Pipeline, LLC (Atlantic) and Dominion Energy Transmission, Inc.<sup>1</sup> (DETI or "Dominion Energy") to construct and operate certain facilities that comprise the Atlantic Coast Pipeline and Supply Header Projects (Projects). *Atlantic Coast Pipeline, LLC & Dominion Energy Transmission, Inc.* 161 FERC ¶ 61,042 (the "Order").

On December 7, 2018, DETI, on behalf of Atlantic and itself, stopped construction, except for stand-down activities, in response to a stay of implementation of the U.S. Fish and Wildlife Service's 2018 Biological Opinion and Incidental Take Statement granted on that date by the U.S. Court of Appeals for the Fourth Circuit (Accession No. 20181207-5147).

Prior to the court stay, construction activities were underway. The work listed in Attachment A is *not* to advance construction, in accordance with the above-referenced December 7 stoppage of construction, but is needed in order to achieve critical stabilization, environmental and cultural resource protection, and public safety. Section V.A.1. of the *FERC Upland Erosion Control, Revegetation, and Maintenance Plan* calls for the completion of final grading, topsoil replacement, and installation of permanent erosion control structures within 20 days after backfilling the trench (ten days in residential areas). The work listed in Attachment A will occur in coordination with FERC staff and adhere to any direction received from FERC staff, including plans for long term stabilization. The activities proposed in Attachment A fall under the category of "no effect" or "may affect, not likely to adversely affect" according to 'Appendix B – Species-Specific Effect Tables' from the September 11, 2018 Biological Opinion.

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

Respectfully submitted,

Isl Matthew R. Bley

Matthew R. Bley Director Gas Transmission Certificates

cc: Mr. Kevin Bowman, FERC

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<sup>&</sup>lt;sup>1</sup> On May 12, 2017, Dominion Transmission, Inc. changed its name to Dominion Energy Transmission, Inc.

# Attachment A

## **General – For Both Atlantic Coast Pipeline & Supply Header Project**

Maintain Erosion Control Devices (ECDs) and install any additional ECDs as necessary.

Continue seeding and mulching of right-of-way (ROW) for winter stabilization in West Virginia in locations where temporary/final grade is established. Currently the weather conditions support stabilization; any interruption in completing these critical winter stabilization activities risks delaying them to occur during potentially more unfavorable weather conditions, which could result in avoidable impacts on sensitive environmental resources.

Install trench plugs in sloped open ditch areas where no pipe welding has taken place. These will help mitigate any potential impact of storm water and erosion issues during/after a rain event.

### **Atlantic Coast Pipeline**

#### Spread 1-1

Milepost (MP) 2.4 - 3.9 - Best-in-Class (BIC) slope and an adjacent area. The ditch on the BIC slope is open and the pipe is welded, coated, and rock-shielded. The pipe on the BIC slope needs to be installed and tied in, BIC measures need to be installed, and the area needs to be backfilled, seeded, and mulched. This would protect the stream (SLEA003) at the base of this slope. Adjacent to the BIC slope, pipe is installed; the pipe needs to be padded, backfilled, seeded, and mulched approximately for 2,700 feet.

MP 8.5 - 8.6 -Classified as a residential area per FERC plans/procedures; the pipe needs to undergo final jeep testing and be patched, lowered into the trench, padded, backfilled, seeded, and mulched. Work needs to be completed to reduce the risk of a safety incident in the residential area.

MP 9.2 - 9.7 - Exposed foreign pipelines because Atlantic Coast Pipeline pipe was installed under foreign pipelines. The pipe needs to be tied in, coated, padded, backfilled, seeded, and mulched. DETI storage pipeline is exposed; the installed pipe needs to be padded, backfilled, seeded and mulched. There are safety concerns with exposed operating foreign utility lines.

MP 9.4 - Broad Run Road Bore – The pipe has been bored/installed under the road. The pipe needs to be tied in, coated, padded, and backfilled, so that the bore pits can be backfilled and the area seeded and mulched. Road bore pits are very close to public roads, and completing this work reduces the potential for safety incidents associated with bore pits.

MP 9.6 – Wymer Road Bore – The pipe has been bored/installed under the road. The pipe needs to be tied in on the going away side of Wymer Road, coated, padded, and backfilled, so that the bore pits can be backfilled and the area seeded and mulched. Road bore pits are very close to public roads, and completing this work reduces the potential for safety incidents associated with bore pits.

### Spread 2-1

MP 34.4 – BIC slope – Install sub drains to control ground water issues. Seed, mulch, and stabilize. This location is impacting a landowner access road. Restoration will provide ingress/egress to the landowner and a third party and decrease the duration of impacts to the landowner.

# Attachment A

MP 35.1 – This location on the ROW is impacting an intersecting landowner access road. ROW restoration will provide ingress/egress to the landowner and a third party well.

MP 36.8 - 37.5 - BIC slope; ditch is currently open and the pipe is strung and welded next to it; planned work is to install the pipe, complete five tie-ins, coat, pad, backfill, seed, and mulch. This is critical for slope stabilization and restoration.

MP 40.4 – Critical stabilization area; ditch is currently open. The pipe is strung and welded next to the ditch and needs to be installed, tied in, coated, padded, backfilled, seeded, and mulched. This location has recently had stabilization concerns, and installing the pipe will allow for stabilization activities to be completed.

MP 40.85 – A landowner is impacted because the ditch is currently open. The pipe is strung and welded next to the ditch and needs to be installed, tied in, coated, padded, backfilled, seeded, and mulched. This location must be completed to allow the landowner to have ingress/egress.

MP 47.1 – Grade needs to be finished and stabilized; grading the area will fix surface water issues, mitigating possible effects to the stream downslope (SRAA066). Once grade is established, the area will be seeded and mulched. No pipe is installed at this location.

## Spread 2A

MP 65.6 - BIC slope area – backfill, seed, and mulch ROW where pipe has already been installed from 3466+00 to 3479+10. To complete this area, three welds will be blasted and coated. In addition, BIC measures will be completed in that area.

MP 69.7 – Backfill ditch with no pipe installed so that the ROW can be stabilized from 3683+00 to 3688+00. The pipe is welded in sections and is currently staged at the top and bottom of the slopes.

MP 70.9 – BIC slope area – backfill, seed, and mulch the ROW where pipe has been installed from 3740+50 to 3745+50. In addition BIC measures will be completed in that area.

MP 71.4 – Backfill ditch with no pipe installed so that the ROW can be stabilized from 3770+00 to 3777+00. The pipe is welded in sections and is currently staged at the top and bottom of the slopes.

MP 75 – Backfill and stabilize area associated with the bore that was attempted on the Dry Fork stream crossing.

MP 92.8 – Route 28 Road Bore – Complete the final 40 feet of the bored road crossing so that the bore pits can be backfilled, seeded, and mulched. Work includes sandblasting and coating the final weld that has been completed, and x-ray prior to installation. Road bore pits are very close to public roads, completing this work reduces the potential for safety incidents associated with bore pits.

### **Marts Compressor Station**

Slip repair is needed. A slip has damaged the access road and has forced the shutdown of two DETI storage wells. Without soil improvements, this area will continue to slip. The remediation plan is to excavate the highly plastic red clay and replace with better soils mixed with cement so that the storage wells can be returned to service.

# **Attachment A**

### **Spread 8**

MP 13.72 – White Hill Road Bore – Complete weld, install carrier pipe, backfill, and restore the ROW. Road bore pits are very close to public roads, completing this work reduces the potential for safety incidents associated with bore pits.

### North Carolina Phase III Archaeological Dig Sites

Currently archaeological sites31JT423 and 031CD2100 have exposed cultural resources due to the status of the investigations. These locations cannot be backfilled until the investigations are complete and it would not be safe for the resources to leave them open for a long period of time, even with protective fencing. Even if the sites were protected with covers, archaeological subject matter experts are concerned that a delay in completing the investigations would compromise the integrity of the archaeological deposits and features, due to wall collapses and floor erosion.

#### **Supply Header Project – Pipeline**

### Spread 13

MP 20.7 – Frank's Run road and stream crossing – backfill and stabilize the ROW. Pipe installation has been completed, but the ditch remains open in this steep slope area as it approaches the county road (approximately 60% grade on the ROW). Completing the backfill, seeding, and mulching of the area are necessary to prevent slips and/or sediment from entering the roadway and waterbody. This activity is anticipated to take two days to complete.

MP 14.2 – ROW on either side of AR 31-074-AR01 – coat and nondestructively test remaining weld, backfill, and stabilize the ROW. Pipe installation is complete, but a small number of welds require coating and radiography prior to backfill and stabilization. This access road is located adjacent to a waterbody at the toe of two sloped sections of ROW. Completing the backfill, seeding and mulching of the area are necessary to prevent slips and/or sediment from entering the waterbody. This activity is anticipated to take five days to complete.

### **Supply Header Project – Facilities**

#### **Crayne Compressor Station**

One of the existing compressor units at Crayne Compressor Station was temporarily taken out of service so that tie-ins to the new piping and equipment could be completed prior to winter. To avoid impacting service to existing customers during the peak winter season, it is necessary for this unit to be placed back in service to resume normal operation as soon as possible. A few activities are required to be completed prior to the unit being placed in service, as described below. None of these include ground disturbance, and the activities are anticipated to take two weeks to complete. The installation of the compressor building panels is required to comply with the FERC noise limit at the nearest Noise Sensitive Area, which is a residential structure. The residence is located directly northeast of the existing compressor building, at a distance of approximately 450 feet in the same direction as the building extension.

- 1. Insulation to be installed on piping;
- 2. Grounding of piping and equipment; and
- 3. Installation of compressor building extension roof and wall panels.

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Document Content(s)
PUBLIC_Cover Letter_Work in Critical Areas.PDF
PUBLIC_Attachment A.PDF2-4