COMMONWEALTH of VIRGINIA

DEPARTMENT OF HEALTH

OFFICE OF DRINKING WATER

211 Nor Dan Drive, Suite 1040
Danville, Virginia 24540

Danville Field Office

Phone: 434-836-8416
Fax: 434-836-8424

DATE: May 12, 2025

FROM: K. Ray Weiland, PE, Engineering Field Director

TO: Arlene F. Warren, GIS Program Support Technician
Arlene.warren@vdh.virginia.gov
VDH, Office of Drinking Water
109 Governor Street, 6th Floor
Richmond, VA 23219

CITY/COUNTY: Pittsylvania County

APPLICANT: Mountain Valley Pipeline, LLC

PERMIT TYPE: Virginia Water Protection (VWP)

APPLICATION TYPE: Amendment

PROJECT: MVP Southgate Amendment

SUBJECT: Review response for DEQ's permit application VWP 25-0752

Mountain Valley Pipeline, LLC (Mountain Valley) has applied for an Individual Permit from the US Army Corps of Engineers to conduct regulated activities below the ordinary high-water elevation of navigable waters under Section 10 of the Rivers and Harbors Act of 1899 and for the discharge of dredged and fill material into Waters of the US under Section 404 of the Clean Water Act (CWA) for the MVP Southgate Amendment Project. In addition, Mountain Valley is requesting CWA § 401 Water Quality Certification (WQC) and a Virginia Water Protection (VWP) permit from the Virginia DEQ.

The Amendment Project is a 31.3-mile, 30-inch-diameter natural gas pipeline between Pittsylvania County, Virginia, and Rockingham County, North Carolina. Pipeline construction through regulated waters will be accomplished using conventional dry-ditch open-cut or trenchless methods. Where the dry-ditch method is employed, flowing water will be diverted around the crossing through the installation of a dam-and-pump or flume, with the specific water diversion method to be decided during construction by the construction supervisor and/or the Mountain Valley representative based on conditions at the time of the crossing. Where trenchless methods are employed, the pipe will be installed with specialized equipment that bores tunnels under the water using either conventional bore or horizontal directional drilling (HDD).

Mountain Valley identified seven streams that would be crossed on the project. Four of these streams will be crossed utilizing open-cut techniques and will be permitted under the VA DEQ Virginia Water Protection (VWP) permit. Mountain Valley is requesting approval for the use of trenchless crossing methods for the three remaining streams that are subject to VMRC jurisdiction.
Mountain Valley is proposing to use the horizontal directional drill (HDD) method for crossing the Sandy River, which will require pumping drilling fluids through the pilot hole while completing this crossing. The conventional bore crossing method is proposed for Cherrystone Creek and the Banister River, which will use a screw auger to install the drill pipe.

No public raw water intakes in Virginia were found within 20 miles downstream of the potential impact areas. The HSCA intake on the Dan River is the nearest intake below the affected areas and is approximately 50 miles downstream. The intake for the Town of Chatham on Cherry Stone Creek is above the area of potential impact. The City of Danville intake on the Dan River is above the confluence of Sandy Creek with the Dan River. In addition, there are no groundwater public water systems located within one mile of the project areas.

There will be no apparent impacts to waterworks sources as a result of this activity.

SVK:dmb

1.0 Project Information

Mountain Valley Pipeline, LLC (Mountain Valley[1]) is seeking an Individual Permit from the United States Army Corps of Engineers (USACE) Norfolk and Wilmington Districts to conduct regulated activities below the ordinary high water elevation of navigable waters under Section 10 of the Rivers and Harbors Act of 1899 and for the discharge of dredged and fill material into Waters of the United States under Section 404 of the Clean Water Act (CWA) for the MVP Southgate Amendment Project (Amendment Project). In addition to the USACE Individual Permit application, Mountain Valley will be requesting CWA § 401 Water Quality Certification (WQC) from the Virginia Department of Environmental Quality (VA DEQ) and North Carolina Department of Environmental Quality for portions of the Amendment Project located within their respective jurisdiction.[2] [3]

Due to the large volume of materials included in this submission and for the convenience of Virginia Marine Resources Commission (VMRC) staff, Mountain Valley has consolidated materials relevant to the VMRC permit request in this attachment.

2.0 Permit Request

The Amendment Project is seeking authorization to encroach in and on State-owned subaqueous bottoms pursuant to Chapter 12, Subtitle III, of Title 28.2 of the Code of Virginia and the Utility Line Encroachments general permit (4 VAC 20-1410). Streams with a drainage basin of greater than five square miles or a mean annual flow greater than five cubic feet per second are considered navigable-in-fact until evidence is presented proving non-navigability and require authorization from the VMRC.

In the course of preparing this multi-agency permit application, Mountain Valley has conducted a detailed evaluation of every stream and wetland associated with the Amendment Project to identify opportunities to avoid and minimize aquatic impacts where appropriate and practicable. As a result of that analysis, Mountain Valley identified a total of seven streams with a drainage area of over five square miles that would be crossed on the Amendment Project. Four of these streams will be crossed utilizing open-cut techniques and will be permitted under the VA DEQ Virginia Water Protection (VWP) permit (Table 1). Mountain Valley is requesting approval for the use of trenchless crossing methods for the three remaining streams that are subject to VMRC jurisdiction, as identified in Table 2 below.

These three streams will be crossed using a trenchless crossing method, which would avoid or minimize instream impacts to subaqueous bottomlands, thereby eliminating direct impacts to the aquatic environment at the location of the crossing and reducing downstream sediment impacts. Mountain Valley is proposing to use the horizontal directional drill (HDD) method for crossing the Sandy River, which will require pumping drilling fluids through the pilot hole while completing this crossing. The conventional bore

[1] Mountain Valley is a joint venture between EQT; NextEra Energy, Inc.; Consolidated Edison, Inc.; AltaGas Ltd.; and RGC Resources, Inc.

[2] Additional detailed Amendment Project information can be found in Section 1.0 of the Individual Permit application narrative.

[3] Mountain Valley reserves all rights to amend, withdraw, or supplement the VMRC Permit Request or any of its Attachments (including the Attachments thereto), and/or to object to, contest, or hold out as optional/ unnecessary any permit, request, approval, or certification applied for, denied, or received pursuant to the VMRC Permit Request or its Attachments, pursuant to any Presidential Executive Order or any governmental action taken as a result of or related to any Presidential Executive Order.

crossing method is proposed for Cherrystone Creek and the Banister River, which will use a screw auger to install the drill pipe. Small quantities of water, bentonite, or polymer-based lubricant may be applied during the conventional bore crossings to increase the likelihood of success. For all trenchless crossing methods, any additives will be non-toxic, non-petroleum based, and NSF-60 compliant to meet FERC requirements. All three crossings will be completed in accordance with the FERC *Wetland and Waterbody Construction and Mitigation Procedures*, the project-specific Erosion and Sediment Control Plan (ESCP), and the Spill Prevention, Control, and Countermeasure Plan.

Mountain Valley is proposing the following crossing methods for streams that have a drainage area greater than five square miles.

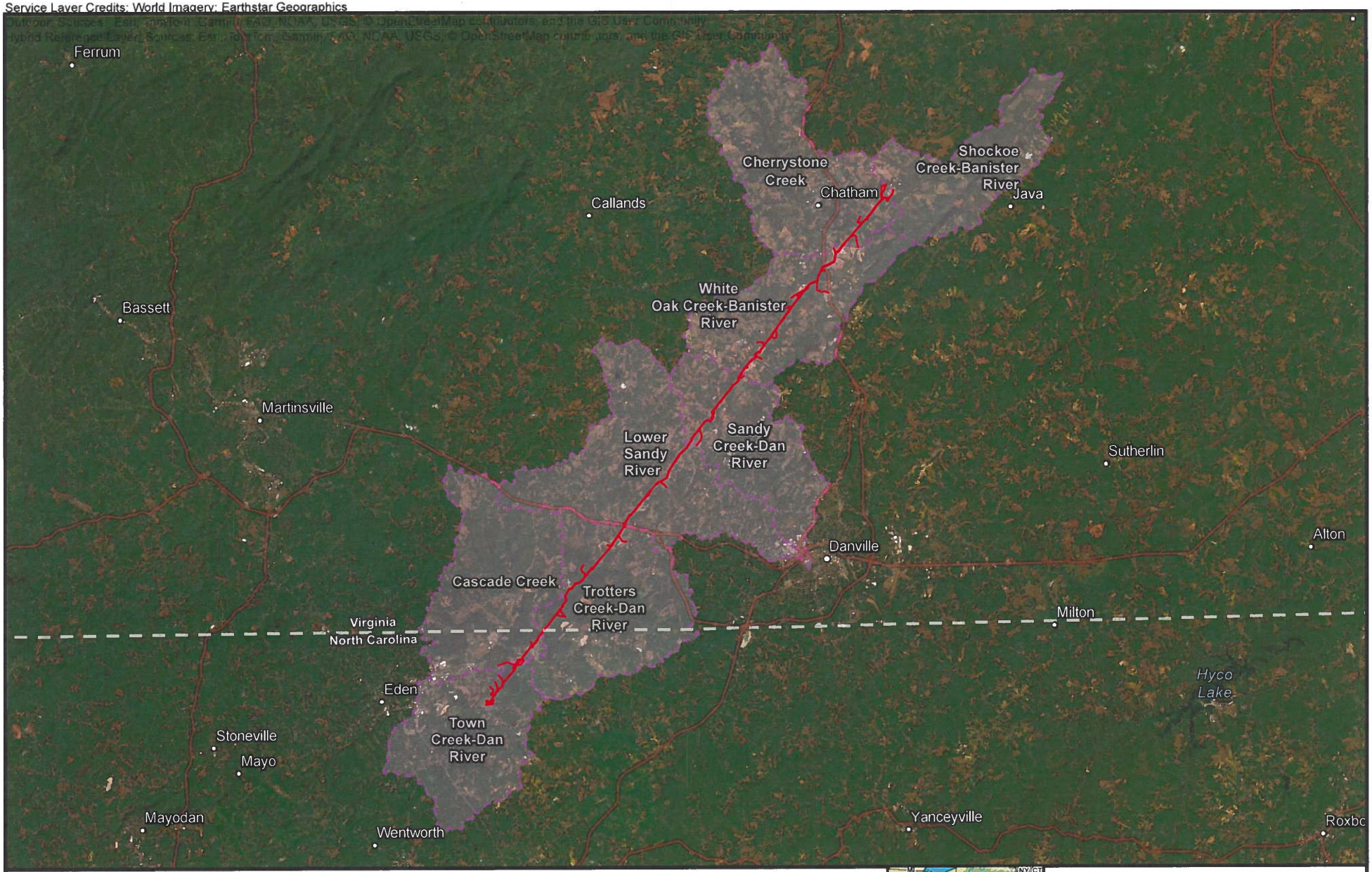
Table 1. Proposed VWP Permit Stream Crossings with Drainage Areas Greater than Five Square Miles

Milepost	Impact ID	Stream	Drainage Area (square miles)	Pipeline Crossing Length (feet)	Linear Feet of Resource in Workspace	Proposed Crossing Method
0.7	S-A004	Little Cherrystone Creek	5.11	20	99	Dry-Ditch Open-Cut
5.3	S-A021	White Oak Creek	15.94	30	91	Dry-Ditch Open-Cut
5.4	S-A022	White Oak Creek	15.72	21	77	Dry-Ditch Open-Cut
23.6	S-B029	Trotters Creek	5.01	14	76	Dry-Ditch Open-Cut

Table 2. Proposed VMRC Permit Stream Crossings with Drainage Areas Greater than Five Square Miles

Milepost	Impact ID	Stream	Drainage Area (square miles)	Pipeline Crossing Length (feet)	Linear Feet of Resource in Workspace	Proposed Crossing Method
2.0	S-A008	Cherrystone Creek	36.62	28	87	Conventional Bore
5.3	S-A020	Banister River	68.62	46	84	Conventional Bore
18.2	S-A063	Sandy River	102.60	84	50	HDD

Service Layer Credits: World Imagery: Earthstar Geographics



Project LOD

Watershed Boundary

NORTH

6 3 0 6

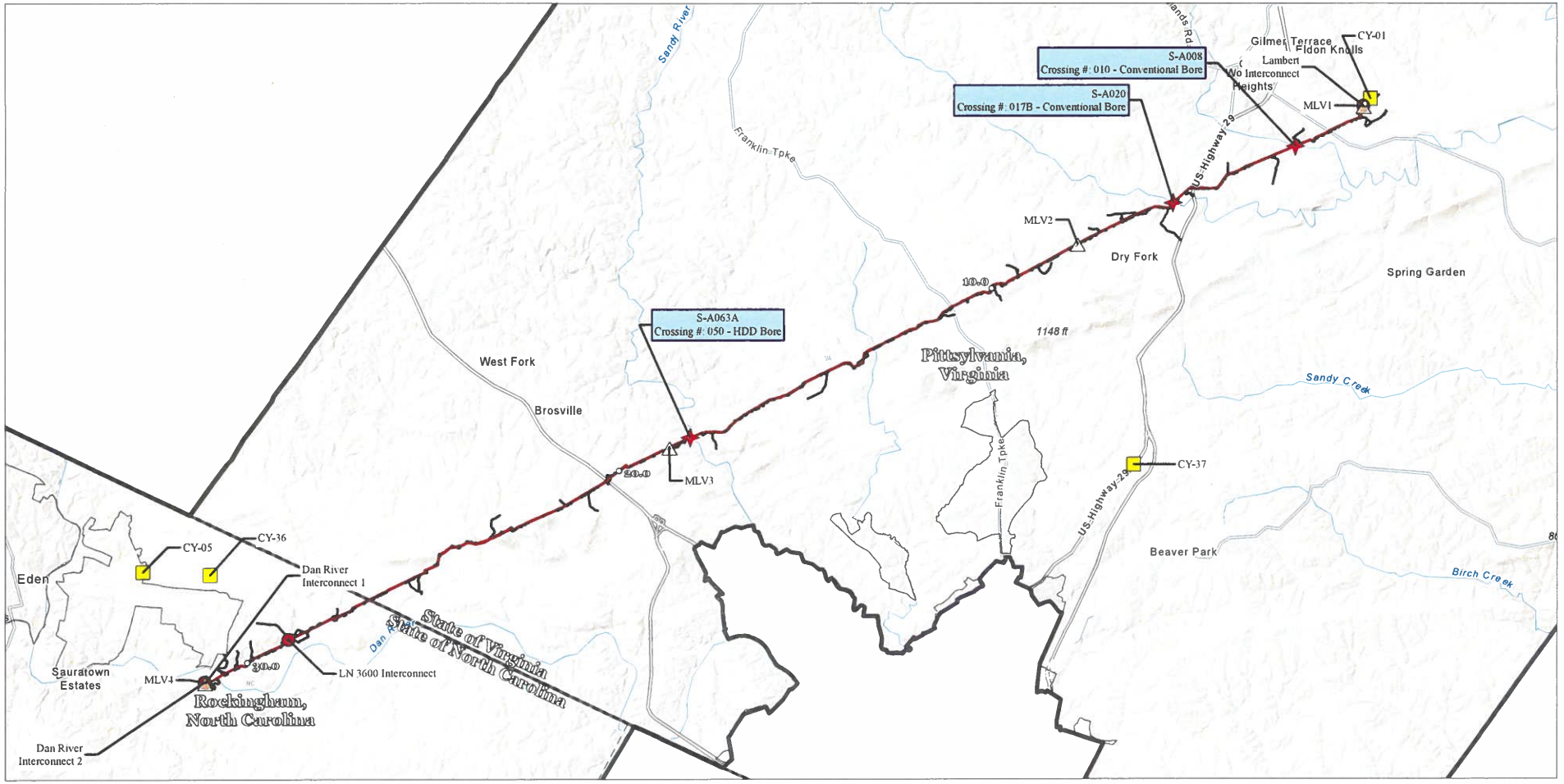
Miles

Mountain Valley

Figure 2
MVP Southgate
Amendment Project
Watershed Boundary - Overview

Source: USGS, MVP

Issued: 3/12/2025



- TEN MILE
- MAINLINE VALVE
- METER STATIONS
- CONTRACTOR YARD
- H-650 PIPELINE
- LIMITS OF CONSTRUCTION RIGHT-OF-WAY
- VMRC AUTHORIZATION REQUEST LOCATIONS
- USA CENSUS URBAN AREAS
- COUNTY BOUNDARY
- STATE BOUNDARY

Delineation ID	Stream Name	MP	Drainage Area (sq mi)	Bore Type
S-A008	Cherrystone Creek	2	36.62	Conventional
S-A020	Banister River	5.3	68.62	Conventional
S-A063	Sandy River	18.2	102.6	HDD

NOTES:
1. THIS FIGURE IS INTENDED TO BE VIEWED OR PRINTED IN COLOR ON 11"X17" SIZE SHEET.
2. BASE MAP SERVICES: ESRI, NASA, NGA, USGS. SOURCES: ESRI, TOMTOM, GARMIN, FAO, NOAA, USGS, © OPENSTREETMAP CONTRIBUTORS, AND THE GIS USER COMMUNITY, ESRI, GEBCO, GARMIN, NATURALVUE, ESRI, USGS

0 7,500 15,000 FEET
1:180,000 1" = 15,000'

PROJECT: MVP Southgate Amendment Project
Pittsylvania County, Virginia and
Rockingham County, North Carolina

TITLE: VMRC STREAM OVERVIEW

DRAWN BY:	J. THOMAS	PROJ. NO.:	300423
CHECKED BY:	A. HORRIE		OVERVIEW
APPROVED BY:	M. TACKEL		
DATE:	APRIL 2025		

TRC
10007 E 59TH STREET
TULSA, OK 74146
PHONE: 918.496.0400

FILE: SOUTHGATEIP_DATAPROCESSING.APRX

Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere Map Rotation: 0
Saved By: JOSHUA.THOMAS on 4/11/2025 11:54:01 AM File Path: C:\GIS\Projects\300423_MVP_Southgate\IP2-APRX\Southgate\P2_DataProcessing.aprx Layout Name: Fig_7 VMRC Stream Overview Map_11x17