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July 23, 2025

Steven VanderPloeg
U.S. Army Corps of Engineers
Norfolk District
9100 Arboretum Parkway, Suite 235
Richmond, VA 23236

Michael J. Mussomeli, PWS
Environmental Specialist II
Virginia Department of Environmental Quality
1111 East Main Street, Suite 1400
Richmond, VA 23228

RE: Mitigation Plan Update for the Pittsylvania County, Virginia Portion of the MVP
Southgate Amendment Project
Permit Application No. 25-0752; NAO-2018-1574; SAW-2018-0887

Dear Messrs. VanderPloeg and Mussomeli:

On April 11, 2025, Mountain Valley Pipeline, LLC (Mountain Valley) submitted a Joint Permit Application (JPA) to the U.S. Army Corps of Engineers (USACE) and the Virginia Department of Environmental Quality (VDEQ) for the MVP Southgate Amendment Project (Amendment Project). The Amendment Project proposes the construction of approximately 31.3 miles of 30-inch-diameter natural gas pipeline, extending from an interconnection point in Pittsylvania County, Virginia, to an interconnection point in Rockingham County, North Carolina, and terminating at two new delivery points within Rockingham County, North Carolina.

In the mitigation plan submitted with the JPA, Mountain Valley included credit reservation letters from the Copper Hill Mitigation Bank (NAO-2023-02173) reserving 3.13 wetland credits and Beaverdam Creek Mitigation Bank (NAO-2023-00944) reserving 2.87 wetland credits and 45 stream credits, for use as compensatory mitigation for unavoidable impacts to waters of the United States and state waters associated with the Amendment Project. These credits would provide compensatory mitigation for unavoidable stream and wetland impacts authorized by USACE permits pursuant to 33 C.F.R. 332.8(a)(1) and VDEQ Virginia Water Protection permits pursuant to § 62.1-44.15:21.

Subsequent coordination with the sponsor of the aforementioned mitigation banks indicated that the release of wetland credits may not occur in a timeframe that aligns with the Amendment Project's construction schedule. Furthermore, the Virginia Aquatic Resources Trust Fund in-lieu fee program is not currently offering advance wetland credits that could serve the Amendment Project. Given the unavailability of suitable wetland credits on the open market and through the in-lieu fee program, Mountain Valley proposes to satisfy the mitigation requirement for 6.31

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wetland credits in Virginia by undertaking a Permittee-Responsible Mitigation (PRM) project. Mountain Valley's proposed mitigation plan for permanent stream impacts in Virginia has not changed. In North Carolina, Mountain Valley continues to propose that all permanent stream and wetland conversion impacts be mitigated through the purchase of credits from the North Carolina Division of Mitigation Services' In-Lieu Fee Program.

Mountain Valley's proposed PRM project (the Snow Creek Mitigation Site) was discussed at a virtual meeting with USACE and VDEQ on June 25, 2025. The purpose of the meeting was to consult with both agencies regarding the proposed PRM project and schedule. Based on the agencies' feedback at the meeting, Mountain Valley is preparing a conceptual mitigation plan for submittal.

The Snow Creek Mitigation Site is located approximately 13 miles northeast of Martinsville in Franklin County, Virginia. It is in the Upper Roanoke HUC 8, 03010101. The proposed mitigation plan at the Snow Creek Mitigation Site includes approximately 3.6 acres of wetland restoration, approximately 3.4 acres of wetland creation, and approximately 3.3 acres of upland buffer preservation intended to generate the 6.31 wetland mitigation credits required by the Amendment Project.

Field activities at the Snow Creek Mitigation Site are beginning the week of July 21, 2025 in support of a Preliminary Jurisdictional Determination, which is anticipated to be submitted to USACE in August 2025. The conceptual mitigation plan will be submitted as a supplement to the JPA upon completion.

Regards,



Jeffrey Klinefelter
Mountain Valley Pipeline, LLC

cc: Steve Hardwick, DEQ Office of Wetlands & Stream Protection
Melanie Davenport, DEQ Division of Cross-Media Programs
Brenda Winn, DEQ Office of Wetlands & Stream Protection
Dave Davis, DEQ Office of Permitting Assistance
Beth Howell, Virginia Marine Resources Commission
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