



## **MVP Southgate Amendment Project**

Docket No. CP25-60-000

### **Implementation Plan**

January 2026 (Docket No. CP25-60-000)



# IMPLEMENTATION PLAN

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Attachment IP-3	Agency Correspondence
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## LIST OF ACRONYMS AND ABBREVIATIONS

Amendment Project	MVP Southgate Amendment Project
APE	Area of Potential Effect
Commission	Federal Energy Regulatory Commission
dBA	A-weighted scale
Dth/d	dekatherms per day
EA	Environmental Assessment
EI	Environmental Inspector
FERC or Commission	Federal Energy Regulatory Commission
IFC	Issued for Construction
L <sub>dn</sub>	day-night sound level
MLV	mainline valve
Mountain Valley	Mountain Valley Pipeline, LLC
NCDEQ	North Carolina Department of Environmental Quality
NGA	Natural Gas Act
NSA	noise sensitive area
OEP	FERC Office of Energy Projects
Order	Order Issuing Certificate for the MVP Southgate Amendment Project, Docket No. CP25-60-000, issued on December 18, 2025
PA	Programmatic Agreement
SEAP	Safety and Environmental Awareness Program
Secretary	Secretary of the Commission
USFWS	U.S. Fish and Wildlife Service
VADEQ	Virginia Department of Environmental Quality

## IMPLEMENTATION PLAN

### 1.1 INTRODUCTION

By order issued December 18, 2025, in Docket No. CP25-60-000 (“Order”), the Federal Energy Regulatory Commission (“FERC” or “Commission”) authorized Mountain Valley Pipeline, LLC (“Mountain Valley”) to construct and operate the MVP Southgate Amendment Project (“Amendment Project”) subject to conditions specified in the Order. The Amendment Project includes the following modifications to the previously authorized project:

- The Lambert Compressor Station and Compressor Station Interconnect would not be constructed, and a portion of this site would be utilized for additional workspace and a temporary access road;
- Pipeline right-of-way, additional temporary extra workspaces, and access roads from MP 31.3 to MP 75.1 have been removed and would not be constructed;
- Four of the eight certificated mainline valves (“MLVs”) have been removed and would not be constructed;
- Two new interconnects (meter stations) would be constructed (the Lambert Interconnect [including MLV-1 and a pig launcher at MP 0.0] and the Dan River Interconnect #2. Two interconnects, the T-15 Interconnect (now named the Dan River Interconnect #1) and LN 3600 Interconnect have not changed and would remain as certificated. One interconnect, the T-21 Haw River Interconnect, has been removed and would not be constructed;
- The pipeline’s operating capacity would increase from 375,000 dekatherms per day (“Dth/d”) to 550,000 Dth/d;
- Two of the four cathodic protection groundbeds would be removed and would not be constructed; and
- Two new contractor yards (CY-36 and CY-37) would be utilized, seven contractor yards would be removed and would not be constructed/utilized, and the footprint of one certificated contractor yard (CY-05) would be reduced.

The Amendment Project’s Environmental Assessment (“EA”) was issued on October 3, 2025. This Implementation Plan addresses the environmental conditions included in the Order as applicable to the Amendment Project. In addition, all applicable environmental conditions of the Commission’s June 18, 2020 Order for the originally proposed Southgate Project in Docket No. CP19-14-000 (see Environmental Condition No. 5 in this document) apply to the amended facilities.

## 1.2 IMPLEMENTATION OF CONDITIONS FROM THE ORDER

### 1.2.1 Environmental Condition No. 1

Mountain Valley shall follow the construction procedures and mitigation measures described in its amendment application and supplements (including responses to staff data requests) and as identified in the EA, unless modified by the Order. Mountain Valley must:

- a. request any modification to these procedures, measures, or conditions in a filing with the Secretary of the Commission (Secretary);
- b. justify each modification relative to site-specific conditions;
- c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
- d. receive approval in writing from the Director of the Office of Energy Projects (OEP), or the Director's designee, **before using that modification.**

#### **Implementation Plan for Environmental Condition No. 1**

Mountain Valley will follow the construction procedures and mitigation measures described in its Amendment Application and supplements (including responses to staff data requests) and as identified in the EA. In the event modifications to these procedures and mitigation measures are deemed to be necessary, Mountain Valley will follow the provisions (a) through (d) of this Condition.

### **1.2.2 Environmental Condition No. 2**

The Director of OEP, or the Director’s designee, has delegated authority to address any requests for approvals or authorizations necessary to carry out the conditions of the Order, and take whatever steps are necessary to ensure the protection of environmental resources during construction of the Amendment Project. This authority shall allow:

- a. the modification of conditions of the Order;
- b. stop-work authority; and
- c. the imposition of any additional measures deemed necessary to ensure continued compliance with the intent of the conditions of the Order as well as the avoidance or mitigation of unforeseen adverse environmental impact resulting from Amendment Project construction and operation.

#### **Implementation Plan for Environmental Condition No. 2**

Mountain Valley acknowledges the delegated authority of the Director of Office of Energy Projects (“OEP”), or the Director’s designee, to ensure the protection of environmental resources during construction and operation of the Amendment Project.

### 1.2.3 Environmental Condition No. 3

The authorized facility locations shall be as shown in the EA, as supplemented by filed alignment sheets. **As soon as they are available, and before the start of construction**, Mountain Valley shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.

Mountain Valley's exercise of eminent domain authority granted under the Natural Gas Act (NGA) section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations. Mountain Valley's right of eminent domain granted under NGA section 7(h) does not authorize it to increase the size of its natural gas pipeline or facilities to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

#### **Implementation Plan for Environmental Condition No. 3**

As soon as they are available, and before the start of construction, Mountain Valley will file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. Mountain Valley acknowledges that any requests for modifications of environmental conditions of the Order or site-specific clearances will be written and will reference locations designated on these alignment maps/sheets.

Mountain Valley acknowledges that the exercise of eminent domain authority granted under Natural Gas Act ("NGA") section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations and that the right of eminent domain granted under NGA section 7(h) does not authorize Mountain Valley to increase the size of its natural gas pipelines or aboveground facilities to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

#### **1.2.4 Environmental Condition No. 4**

**Within 5 days of receipt of a water quality certification issued by the Virginia Department of Environmental Quality (VADEQ) and the North Carolina Department of Environmental Quality (NCDEQ), Mountain Valley shall file the complete certification, including all conditions. All conditions attached to the water quality certification constitute mandatory conditions of the Certificate Order. Prior to construction, Mountain Valley shall file, for review and written approval of the Director of OEP, or the Director’s designee, any revisions to its project design necessary to comply with the water quality certification conditions.**

#### **Implementation Plan for Environmental Condition No. 4**

Mountain Valley filed the water quality certification issued by the North Carolina Department of Environmental Quality (“NCDEQ”) on November 14, 2025 (Accession No. 20251114-5104). Mountain Valley filed the water quality certification issued by the Virginia Department of Environmental Quality (“VADEQ”) on January 14, 2026 (Accession No. 20260114-5081).

Prior to construction, Mountain Valley will file for review and written approval of the Director of OEP, or the Director’s designee, any applicable revisions to its project design necessary to comply with the water quality certification conditions.



### **1.2.5 Environmental Condition No. 5**

Mountain Valley shall comply with all applicable environmental conditions in the Appendix of the Commission's June 18, 2020 Order for the Southgate Project in Docket No. CP19-14-000.

#### **Implementation Plan for Environmental Condition No. 5**

Mountain Valley will comply with the applicable environmental conditions in the Appendix of the Commission's June 18, 2020 Order for the Southgate Project in Docket No. CP19-14-000, as detailed in Section 1.2.5.1 below.

### 1.2.5.1 Environmental Conditions from CP19-14-000

#### *Environmental Condition No. 1 (CP19-14-000)*

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*Mountain Valley shall follow the construction procedures and mitigation measures described in its application, supplemental filings (including responses to staff data requests), and as identified in the EIS, unless modified by the Order. Mountain Valley must:*

- a. request any modification to these procedures, measures, or conditions in a filing with the Secretary of the Commission (Secretary);*
- b. justify each modification relative to site-specific conditions;*
- c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and*
- d. receive approval in writing from the Director of the Office of Energy Projects (OEP), or the Director's designee, **before using that modification.***

#### **Implementation Plan for Environmental Condition No. 1 (CP19-14-000)**

See Section 1.2.1 (Environmental Condition No. 1) of this Implementation Plan (Docket No. CP25-60-000).

***Environmental Condition No. 2 (CP19-14-000)***

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*The Director of OEP, or the Director's designee, has delegated authority to address any requests for approvals or authorizations necessary to carry out the conditions of the Order, and take whatever steps are necessary to ensure the protection of environmental resources during construction and operation of the Project. This authority shall allow:*

- a. the modification of conditions of the Order;*
- b. stop-work authority; and*
- c. the imposition of any additional measures deemed necessary to ensure continued compliance with the intent of the conditions of the Order as well as the avoidance or mitigation of unforeseen adverse environmental impact resulting from Project construction and operation.*

**Implementation Plan for Environmental Condition No. 2 (CP19-14-000)**

See Section 1.2.2 (Environmental Condition No. 2) of this Implementation Plan (Docket No. CP25-60-000).

***Environmental Condition No. 3 (CP19-14-000)***

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*Prior to any construction, Mountain Valley shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, environmental inspectors (EIs), and contractor personnel will be informed of the EIs' authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs **before** becoming involved with construction and restoration activities.*

**Implementation Plan for Environmental Condition No. 3 (CP19-14-000)**

Included as Attachment IP-1 is the affirmative statement, certified by a senior company official, that all company personnel, environmental inspectors ("EIs"), and contractor personnel will be informed of the EIs' authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs before becoming involved with construction and restoration activities.

***Environmental Condition No. 4 (CP19-14-000)***

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*The authorized facility locations shall be as shown in the EIS, as supplemented by filed alignment sheets. As soon as they are available, and before the start of construction, Mountain Valley shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.*

*Mountain Valley's exercise of eminent domain authority granted under Natural Gas Act Section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations. Mountain Valley's right of eminent domain granted under Natural Gas Act Section 7(h) does not authorize it to increase the size of its natural gas facilities to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.*

**Implementation Plan for Environmental Condition No. 4 (CP19-14-000)**

See Section 1.2.3 (Environmental Condition No. 3) of this Implementation Plan (Docket No. CP25-60-000).

**Environmental Condition No. 5 (CP19-14-000)**

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*Mountain Valley shall file with the Secretary detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all route realignments or facility relocations, and staging areas, construction support areas, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/sheets/aerial photographs. All areas must be approved in writing by the Director of OEP, or the Director's designee, **before construction in or near that area.***

*This requirement does not apply to extra workspace allowed by the Commission's Upland Erosion Control, Revegetation, & Maintenance Plan and/or minor field realignments per landowner needs and requirements that do not affect other landowners or sensitive environmental areas such as wetlands.*

*Examples of alterations requiring approval include all facility location changes resulting from:*

- a. implementation of cultural resources mitigation measures;*
- b. implementation of endangered, threatened, or special concern species mitigation measures;*
- c. recommendations by state regulatory authorities; and*
- d. agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.*

**Implementation Plan for Environmental Condition No. 5 (CP19-14-000)**

Mountain Valley acknowledges that route realignments or facility relocations, staging areas, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary must be approved in writing by the Director of OEP, or the Director's designee, before construction in or near that area. Mountain Valley will comply with this Condition and implement it as written for the Amendment Project.

Mountain Valley will follow the construction procedures and mitigation measures described in its Amendment Application and supplements (including responses to staff data requests) and as identified in the EA.

**Environmental Condition No. 6 (CP19-14-000)**

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*Within 60 days of their acceptance of a Certificate and before construction begins, Mountain Valley shall file its Implementation Plans for review and written approval by the Director of OEP, or the Director's designee. Mountain Valley must file revisions to its plans as schedules change. The plans shall identify:*

- a. how Mountain Valley will implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EIS, and required by the Order;*
- b. how the Mountain Valley will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to on-site construction and inspection personnel;*
- c. the number of EIs assigned per spread and/or facility, and how Mountain Valley will ensure that sufficient personnel are available to implement the environmental mitigation;*
- d. company personnel, including EIs and contractors, who will receive copies of the appropriate materials;*
- e. the location and dates of the environmental compliance training and instructions Mountain Valley will give to all personnel involved with construction and restoration (initial and refresher training as the Project progresses and personnel change) with the opportunity for OEP staff to participate in the training session(s);*
- f. the company personnel (if known) and specific portion of the Mountain Valley's organization having responsibility for compliance;*
- g. the procedures (including use of contract penalties) that Mountain Valley will follow if noncompliance occurs; and*
- h. for each discrete facility, a Gantt or Program Evaluation Review Technique (PERT) chart (or similar project scheduling diagram), and dates for:*
  - i. the completion of all required surveys and reports;*
  - ii. the environmental compliance training of on-site personnel;*
  - iii. the start of construction; and*
  - iv. the start and completion of restoration.*

**Implementation Plan for Environmental Condition No. 6 (CP19-14-000)**

Mountain Valley hereby submits its initial Implementation Plan (Docket No. CP25-60-000) to satisfy this Condition. Where information cannot be provided for certain environmental conditions, Mountain Valley has provided an anticipated schedule for providing the requested information. Specific responses to subparts 6a through 6h are provided below.

***Response to Environmental Condition 6a:***

Mountain Valley will implement the applicable construction procedures and mitigation measures described in its certificate application and supplemental filings (including responses to staff data requests), and its Amendment Application and supplements (including responses to staff data requests) as referenced in the EA and required by the Order. These procedures will be incorporated into the Amendment Project construction and compliance documents and within its environmental training to the selected contractors prior to the commencement of construction.

Mountain Valley will abide by the requirements detailed in Mountain Valley's *Upland Erosion Control, Revegetation and Maintenance Plan* and Mountain Valley's *Wetland and Waterbody Construction and Mitigation Procedures*, with the exception of those variances specifically requested in the Environmental Report and subsequent filings and acknowledged within the FERC EA issued for the Amendment Project. Mountain Valley will exercise appropriate oversight of construction procedures and mitigation measures, including requiring and monitoring compliance with the following revised and applicable plans for the Amendment Project:

- EA and Permit Requirements;
- Issued for Construction ("IFC") Drawings and Alignment Sheets;
- Winter Construction Plan;
- Fire Prevention and Suppression Plan;
- Spill Prevention, Control, and Countermeasure Plan and Unanticipated Discovery of Contamination Plan for Construction Activities in Virginia and North Carolina;
- Public, Stakeholder, and Agency Participation Plan;
- Emergency Response Plan
- Hill View Farm Protection Plan
- Unanticipated Discovery Plan for Paleontological Resources;
- HDD Contingency Plan;
- Water Resources Identification and Testing Plan;
- Plan for Unanticipated Discovery of Historic Properties and Human Remains;
- Pipeline Stream Crossing Burial Recommendations
- Exotic and Invasive Species Control Plan;
- Landowner Complaint Resolution Procedure;
- Landslide Mitigation Report;
- Traffic and Transportation Management Plan;
- Mountain Valley Upland Erosion Control, Revegetation and Maintenance Plan;
- Mountain Valley Wetland and Waterbody Construction and Mitigation Procedures;
- General Blasting Plan;
- State-specific Erosion and Sediment Control Plans;
- Nighttime Construction Noise Management Plan;
- Residential Mitigation Plans;
- Programmatic Agreement for Section 106 Consultation;
- U.S. Army Corps of Engineers Nationwide Permits;
- VADEQ Project Specific Standards and Specifications for Virginia;
- 401 Water Quality Certifications;
- U.S. Fish and Wildlife Service ("USFWS") Section 7 Consultation; and
- Various Protection Plans for Archeological Sites.

Additional details are provided in responses to Environmental Conditions 6b through 6h, below.

***Response to Environmental Condition 6b:***

Mountain Valley will incorporate into its contract bid documents, construction contracts, and construction drawings the construction procedures and mitigation measures described in its Amendment Application and supplemental filings (including responses to staff data requests), identified in the EA, and required by the Order.

Mountain Valley will conduct environmental training for all EIs (including FERC's third-party monitors), Construction Inspectors, and all contractors' lead, craft, and labor personnel. In addition, all Mountain Valley employees involved with the construction of the Amendment Project will receive training. See response to Environmental Condition 6e for more detail.

The construction contracts include corrective mechanisms for contractor noncompliance with the Amendment Project requirements (Mountain Valley Plan, Project Drawings, Permit Conditions, Certificate Conditions, Mitigations, etc.) and federal, state, and local laws as applicable. These measures include corrections at the contractor's cost, addition of more stringent work practices, removal of negligent personnel, and ultimately cancellation of the contract in its entirety.

***Response to Environmental Condition 6c:***

The Lead EIs will provide overall coordination for FERC reporting and FERC compliance monitoring. The Lead EIs will also be responsible for interfacing with any resource agency personnel involved with the execution of the Amendment Project, including FERC's third-party monitors. Mountain Valley expects to employ 12 EIs, which includes one Lead EI. Mountain Valley will reallocate or increase manpower as necessary to support compliance and mitigation requirements.

***Response to Environmental Condition 6d:***

All Mountain Valley leads, EIs (including FERC's third-party monitors), construction inspectors, and contractor supervisory personnel will receive copies of the following documents:

- IFC drawing packages (detailed design drawings and typicals, station plot plans, site grading plans);
- IFC alignment sheets, including laydown yards and access roads;
- Pertinent project-related engineering and environmental documents;
- Landowner Worksheet Binders; and
- Residential Mitigation Plans.

Each recipient will be required to affirm their receipt, understanding, and intent to comply with these documents by signature prior to beginning work. In addition, copies of relevant documents will be available on-site for ready reference.

***Response to Environmental Condition 6e:***

All on-site Amendment Project personnel, including the Chief Inspector, non-destructive testing crews, craft inspectors, office personnel, contractor supervisors, contractor foremen and laborers, subcontractors, EIs (including FERC's third-party monitors), and all other Amendment Project personnel will be required to attend a Safety and Environmental Awareness Program ("SEAP") training session prior to entering any Amendment Project area.



During this training session, on-site personnel will be informed of the authority of the EIs and FERC’s third-party monitors and will be trained on the implementation of the environmental mitigation measures appropriate to their job responsibilities and company expectations. The requirements applicable to the individual crew members’ duties will be presented and discussed for emphasis. In addition, training will be held for all newly hired personnel before they may commence work on the Amendment Project. Follow-up refresher training will be held throughout the construction of the Amendment Project to ensure that the mitigation required for the Amendment is clear to onsite construction and inspection personnel.

Following each training session, all personnel will be required to acknowledge that they understand the environmental compliance requirements associated with the Amendment Project and agree to adhere to all requirements presented during the training session. Each individual successfully completing the SEAP training will be issued an Amendment Project sticker. Only individuals displaying the sticker will be allowed into active Amendment Project areas.

OEP personnel and other resource agency personnel are welcome to attend any or all SEAP training sessions. Visitors to the site and workers added after contractor mobilization will receive SEAP training on-site by either an EI or designated Construction Inspector, utilizing Amendment Project-specific training documents.

The times and locations for the SEAP training sessions have yet to be determined. Mountain Valley will notify FERC’s OEP staff and personnel and extend them an invitation to participate.

***Response to Environmental Condition 6f:***

The Mountain Valley team is responsible for permit compliance on the Amendment Project. Company personnel with designated responsibilities for compliance are listed below.

<b>Name</b>	<b>Company</b>	<b>Position</b>
Jim Sabol	Mountain Valley	Project Manager
Jeff Klinefelter	Mountain Valley	VP of Construction
Kameron Barnhouse	Mountain Valley	Construction Manager – Pipeline
TBD	Mountain Valley	Construction Manager – Facilities
Megan Neylon	Mountain Valley	Manager of Permitting
Cory Chalmers	Mountain Valley	Permitting Coordinator
Brian Clauto	Mountain Valley	Permitting Coordinator

***Response to Environmental Condition 6g:***

In the event of a noncompliance issue, the Lead EI (in consultation with FERC’s third-party monitors, as applicable), Chief Inspector, and the Mountain Valley Construction Manager will coordinate with the contractor to determine the appropriate resolution of the noncompliance issue, as well as the timeframe for resolving the issue. The Lead EI will document the noncompliance issue, measures taken to resolve the noncompliance (or the date the measure will be implemented), and the effectiveness of the corrective actions taken. A summary of the noncompliance issues and corrective actions taken will be included in the Amendment Project’s weekly status report.

Mountain Valley will treat any instance of noncompliance as either a noncompliance or a serious violation:

Noncompliance –small-scale issues not attributed to carelessness, neglect, or to chronic and/or ongoing failure to follow best practices. In the event of these incidents, contractors will be required to correct the problem in a timely manner at their own cost. If warranted in the opinion of the EI, retraining of employees and a thorough review of the work practices involved may also be required at the contractor’s cost.

Serious Violation –large-scale issues attributed to carelessness, neglect, or to chronic and/or ongoing failure to follow best practices. Work stoppages will be issued in the event of these incidents. Immediate correction at the contractor’s cost will be required, as well as removal of negligent personnel from the Amendment Project. In addition, the contractor will be required to submit a corrective plan with monitoring provisions prior to resuming work. The construction contract may also be terminated.

***Response to Environmental Condition 6h:***

Due to time-of-year tree clearing restrictions applicable to Mileposts 5.7-7.8 and other factors affecting the construction schedule, Mountain Valley anticipates commencing construction activities in March 2026. Mountain Valley will provide a milestone schedule in a supplement to this Implementation Plan.

***Environmental Condition No. 7 (CP19-14-000)***

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*Mountain Valley shall employ a team of EIs (i.e., two or more or as may be established by the Director of OEP or the Director's designee) per construction spread. The EIs shall be:*

- a. responsible for monitoring and ensuring compliance with all mitigation measures required by the Order and other grants, permits, certificates, or authorizing documents;*
- b. responsible for evaluating the construction contractor's implementation of the environmental mitigation measures required in the contract (see condition 6 above) and any other authorizing document;*
- c. empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document;*
- d. a full-time position separate from all other activity inspectors;*
- e. responsible for documenting compliance with the environmental conditions of the Order, as well as any environmental conditions/permit requirements imposed by other federal, state, or local agencies; and*
- f. responsible for maintaining status reports.*

**Implementation Plan for Environmental Condition No. 7 (CP19-14-000)**

Mountain Valley will comply with this Condition and implement it as written for the Amendment Project.

***Environmental Condition No. 8 (CP19-14-000)***

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*Beginning with the filing of its Implementation Plan, Mountain Valley shall file updated status reports with the Secretary on a weekly basis until all construction and restoration activities are complete. On request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include the following:*

- a. an update on Mountain Valley's efforts to obtain the necessary federal authorizations;*
- b. the construction status of each spread, work planned for the following reporting period, and any schedule changes for stream crossings or work in other environmentally sensitive areas;*
- c. a listing of all problems encountered and each instance of noncompliance observed by the EIs during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);*
- d. a description of the corrective actions implemented in response to all instances of noncompliance;*
- e. the effectiveness of all corrective and remedial actions implemented;*
- f. a description of any landowner/resident complaints which may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns; and*
- g. copies of any correspondence received by Mountain Valley from other federal, state, or local permitting agencies concerning instances of noncompliance, and Mountain Valley's response.*

**Implementation Plan for Environmental Condition No. 8 (CP19-14-000)**

Mountain Valley will comply with this Condition and implement it as written for the Amendment Project.

**Environmental Condition No. 9 (CP19-14-000)**

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*Mountain Valley shall implement its environmental complaint resolution procedure. The procedure shall provide landowners with clear and simple directions for identifying and resolving their environmental mitigation problems/concerns during construction of the Project and restoration of the right-of-way. **Prior to construction**, Mountain Valley shall mail the complaint procedures to each landowner whose property will be crossed by the Project.*

- a. In its letter to affected landowners, Mountain Valley shall:*
  - i. provide a local contact that the landowners should call first with their concerns; the letter shall indicate how soon a landowner should expect a response;*
  - ii. instruct the landowners that if they are not satisfied with the response, they should call Mountain Valley's Hotline; the letter shall indicate how soon to expect a response; and*
  - iii. instruct the landowners that if they are still not satisfied with the response from Mountain Valley's Hotline, they should contact the Commission's Landowner Helpline at 877-337-2237 or at [LandownerHelp@ferc.gov](mailto:LandownerHelp@ferc.gov).*
- b. In addition, Mountain Valley shall include in its weekly status report a copy of a table that contains the following information for each problem/concern:*
  - i. the identity of the caller and date of the call;*
  - ii. the location by milepost and identification number from the authorized alignment sheet(s) of the affected property;*
  - iii. a description of the problem/concern; and*
  - iv. an explanation of how and when the problem was resolved, will be resolved, or why it has not been resolved.*

**Implementation Plan for Environmental Condition No. 9 (CP19-14-000)**

Mountain Valley developed an environmental complaint resolution procedure that was filed in Appendix 1-G of its Amendment Application (Accession No. 20250203-5192). Mountain Valley will mail the complaint procedures to landowners prior to construction. In addition, Mountain Valley will include in its status reports to the Commission the information required in the Condition.

***Environmental Condition No. 10 (CP19-14-000)***

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*Mountain Valley must receive written authorization from the Director of OEP, or the Director's designee, before commencing construction of any Project facilities. To obtain such authorization, Mountain Valley must file with the Secretary documentation that it has received all applicable authorizations required under federal law (or evidence of waiver thereof).*

**Implementation Plan for Environmental Condition No. 10 (CP19-14-000)**

Mountain Valley continues to work with respective agencies to obtain all authorizations required under federal law for the Amendment Project. The table in Attachment IP-2 summarizes the status of authorizations to date. An updated version of this table will be filed with the Commission as part of Mountain Valley's request for Notice to Proceed with construction activities.

***Environmental Condition No. 11 (CP19-14-000)***

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*Mountain Valley must receive written authorization from the Director of OEP, or the Director's designee, before placing the Project facilities into service. Such authorization would only be granted following a determination that rehabilitation and restoration of the areas affected by the Project are proceeding satisfactorily.*

**Implementation Plan for Environmental Condition No. 11 (CP19-14-000)**

Mountain Valley will comply with this Condition and implement it as written for the Amendment Project.

***Environmental Condition No. 12 (CP19-14-000)***

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***Within 30 days of placing the authorized facilities in-service, Mountain Valley shall file an affirmative statement with the Secretary, certified by a senior company official:***

- a. that the facilities have been constructed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or*
- b. identifying which of the conditions of the Order Mountain Valley has complied with or will comply with. This statement shall also identify any areas affected by the Project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.*

**Implementation Plan for Environmental Condition No. 12 (CP19-14-000)**

Mountain Valley will comply with this Condition and implement it as written for the Amendment Project.

***Environmental Condition No. 13 (CP19-14-000)***

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***Prior to construction***, Mountain Valley shall file with the Secretary, for review and written approval by the Director of OEP, or the Director's designee, a revised *General Blasting Plan* that clarifies it will not bury excess rock fragments generated during trenching or blasting in any location other than where the rock originated. Excess rock fragments not suitable for reburial at the point of origin should be considered construction debris and should be disposed of consistent with our *Upland Erosion Control, Revegetation, & Maintenance Plan* at sections III.E and V.A.3.

**Implementation Plan for Environmental Condition No. 13 (CP19-14-000)**

Mountain Valley has revised its *General Blasting Plan*, which clarifies that excess rock fragments generated during trenching or blasting will not be buried in any location other than where the rock originated. The revised *General Blasting Plan* for the Amendment Project was filed in Appendix 1-G of its Amendment Application (Accession No. 20250203-5192). An updated version of this plan was provided in updated Appendix 1-G in Attachment 1-4 in Mountain Valley's response to Environmental Information Request 2 dated June 25, 2025, and filed on July 15, 2025 (Accession No. 20250715-5108). Excess rock fragments not suitable for reburial at the point of origin will be considered construction debris and will be disposed of consistent with the Amendment Project's *Upland Erosion Control, Revegetation, & Maintenance Plan* at sections III.E and V.A.3. With the provided information, Mountain Valley considers this condition complete and does not intend to file any further information.

***Environmental Condition No. 14 (CP19-14-000)***

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***Prior to construction***, Mountain Valley shall file with the Secretary, for review and written approval by the Director of OEP, or the Director's designee, the locations of all private water wells and springs identified within 150 feet of the Project work areas, including the well's or springs' status, use, distance from construction workspace, and any proposed measures to minimize or avoid impacts on the private water wells or springs.

**Implementation Plan for Environmental Condition No. 14 (CP19-14-000)**

Mountain Valley filed its table of all wells and springs that were located within 150 feet of the Project works areas in its response to Environmental Information Request 4 dated August 25, 2025, and filed on September 2, 2025 (Accession No. 20250903-5011). Measures to protect these identified wells are provided within *Mountain Valley's Water Resources Identification and Testing Plan*, as filed in Appendix 1-G of its Amendment Application (Accession No. 20250203-5192). An updated version of this plan was provided in updated Appendix 1-G in Attachment 1-4 in Mountain Valley's response to Environmental Information Request 2 dated June 25, 2025, and filed on July 15, 2025 (Accession No. 20250715-5108). With the provided information, Mountain Valley considers this condition complete and does not intend to file any further information. Should additional wells be identified prior to or during construction, Mountain Valley will file the locations of these wells with FERC and implement the measures described in its *Water Resources Identification and Testing Plan* to protect the wells.

***Environmental Condition No. 16 (CP19-14-000)***

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***Prior to construction***, Mountain Valley shall file with the Secretary, for review and written approval by the Director of OEP, or the Director's designee, its final list of water sources to be used for the Project (dust control, hydrostatic testing, and horizontal directional drill operations), including intake location, waterbody name, withdrawal rate and method, and measures to minimize entrainment of aquatic species. Mountain Valley shall also provide written concurrence from the U.S. Fish and Wildlife Service (FWS) for any water withdrawals from the Dan River.

**Implementation Plan for Environmental Condition No. 16 (CP19-14-000)**

Mountain Valley provided its list of water sources to be used for the Project in Attachment G-3 in Mountain Valley's response to Environmental Information Request 2 dated June 25, 2025, and filed on August 8, 2025 (Accession No. 20250808-5160). Mountain Valley is continuing to coordinate with the USFWS regarding the potential effects to federal species as a result of the use of the Dan River as part of its Section 7 consultation. Further correspondence with USFWS will be filed with FERC upon receipt.

***Environmental Condition No. 17 (CP19-14-000)***

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*During construction and prior to any Project in-service approval, Mountain Valley shall remove and dispose of timber and debris from the right-of-way. Mountain Valley must ensure that any beneficial reuse of timber that is not removed and remains on or adjacent to the right-of-way, as agreed to by the landowner, is located at access points where the landowner can reasonably retrieve timber without any inadvertent impacts on the restored right-of-way, in accordance with the FERC Upland Erosion Control, Revegetation, and Maintenance Plan, section III.E.*

**Implementation Plan for Environmental Condition No. 17 (CP19-14-000)**

Mountain Valley will remove and dispose of timber from the right-of-way to the extent required by its agreements with landowners. If a landowner's agreement provides that timber may remain on their property, then Mountain Valley will stack the timber on or adjacent to the right-of-way with the appropriate gaps for the safe passage of wildlife. Mountain Valley's standard practice will also be to stack the timber at reasonable access points where the timber can be retrieved without adverse environmental impact to the right-of-way. After Mountain Valley disposes of the timber by stacking, the landowner, not Mountain Valley, determines the method for retrieving and timing for the beneficial reuse of their timber on their property. If the landowner's agreement does not provide that timber may remain on their property, then Mountain Valley will dispose of the timber in a timely manner, such as by removing the timber from the Amendment Project site, chipping, or burning.



***Environmental Condition No. 18 (CP19-14-000)***

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*In order to identify locations where additional protection measures will be needed, and to inform compliance monitoring, Mountain Valley shall file with the Secretary, the results of the pre-construction bald eagle nest and colonial rookery surveys prior to construction.*

**Implementation Plan for Environmental Condition No. 18 (CP19-14-000)**

Per Mountain Valley's *Migratory Bird Conservation Plan* and the EA, Mountain Valley will conduct large bird nest surveys prior to construction-related tree clearing between January 31 and March 31 within 0.5 mile of the Amendment Project limit of disturbance. Surveys are currently scheduled for February 2026. Results of these surveys will be provided to the USFWS and to FERC once complete.

***Environmental Condition No. 19 (CP19-14-000)***

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*Mountain Valley shall **not begin** construction activities **until**:*

- a. Mountain Valley files with the Secretary the results of all outstanding biological surveys;*
- b. the staff completes Endangered Species Act consultation with the FWS; and*
- c. Mountain Valley has received written notification from the Director of OEP, or the Director's designee, that construction or use of mitigation may begin.*

**Implementation Plan for Environmental Condition No. 19 (CP19-14-000)*****Response to Environmental Condition 19a***

Per Mountain Valley's *Migratory Bird Conservation Plan* and the EA, Mountain Valley will conduct large bird nest surveys prior to construction-related tree clearing between January 31 and March 31 within 0.5 mile of the Amendment Project limit of disturbance. Results of these surveys will be provided to the USFWS and filed with FERC once complete.

***Response to Environmental Condition 19b***

Mountain Valley is continuing to coordinate with the USFWS to complete its Section 7 consultation. Mountain Valley will file further information with FERC once received.

***Response to Environmental Condition 19c***

Mountain Valley will comply with this Condition and implement it as written.

**Environmental Condition No. 20 (CP19-14-000)**

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*Mountain Valley shall not begin construction of facilities and/or use of all staging, storage, or temporary work areas and new or to-be-improved access roads until:*

- a. Mountain Valley files with the Secretary:
  - i. remaining cultural resources survey reports;*
  - ii. site evaluation reports and avoidance or treatment plans, as required; and*
  - iii. comments on the cultural resources reports and plans from the Virginia and North Carolina State Historic Preservation Officers and interested Indian tribes.**
- b. Mountain Valley implements the stipulations of the May 17, 2020 executed programmatic agreement for the Southgate Project; and*
- c. The Commission staff reviews and the Director of OEP, or the Director's designee, approves the cultural resources reports and plans, and notifies Mountain Valley in writing that treatment plans/mitigation measures (including archaeological data recovery) may be implemented and/or construction may proceed.*

*All materials filed with the Commission containing location, character, and ownership information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: "CUI//PRIV- DO NOT RELEASE."*

**Implementation Plan for Environmental Condition No. 20 (CP19-14-000)**

Mountain Valley filed additional cultural resource reports and updated protection plans for all outstanding areas for the Amendment Project in Appendices 4-A through 4-G of its Amendment Application filed as "CUI//PRIV- DO NOT RELEASE" (Accession No. 20250203-5195). All cultural resource surveys of the Physical Area of Potential Effect ("APE") and Non-Physical APE have been completed, and there are no outstanding cultural resources surveys for the Amendment Project.

Mountain Valley has included appropriate agency correspondence and concurrences with the Virginia and North Carolina State Historic Preservation Officers, as well as interested Indian tribes, in Accession Nos. 20250203-5193, 20250328-5286, 20250715-5108, and 20250808-5160.

Mountain Valley filed an amendment to the Programmatic Agreement ("PA") for the Amendment Project in Accession No. 20250801-5151. Mountain Valley will complete the stipulations of the amended PA once executed prior to or during construction.

Agency correspondence that has not yet been filed to date is included in Attachment IP-3. The results of any remaining correspondence with applicable agencies will be filed with FERC upon receipt.

***Environmental Condition No. 21 (CP19-14-000)***

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*Prior to construction, Mountain Valley shall file its Nighttime Construction Noise Management Plan with the Secretary, for review and written approval by the Director of OEP, or the Director's designee, that demonstrates noise levels will be reduced below 48.6 decibels on the A-weighted scale (dBA) at night and 55 dBA day-night sound level (Ldn) overall at the nearest noise sensitive area (NSA), or not exceed 10 dBA over the ambient at the nearest NSA where ambient noise levels are already above 55 dBA. This plan shall indicate site-specific mitigation measures and indicate resulting noise impacts on NSAs.*

**Implementation Plan for Environmental Condition No. 21**

Mountain Valley filed a revised *Nighttime Construction Noise Management Plan* for the Amendment Project in Appendix 1-G of its Amendment Application (Accession No. 20250203-5192). Mountain Valley is in the process of updating this plan as requested as part of Environmental Condition No. 9 of this Implementation Plan (Docket No. CP25-60-000). A revised *Nighttime Construction Noise Management Plan* will be filed with FERC once complete.

See Section 1.2.9 (Environmental Condition No. 9) of this Implementation Plan (Docket No. CP25-60-000) for further details.

***Environmental Condition No. 22 (CP19-14-000) – Not Applicable***

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*No later than 60 days after placing the Lambert Compressor Station (including the Interconnect) into service, Mountain Valley shall file a noise survey with the Secretary. If a full load condition noise survey is not possible, Mountain Valley shall provide an interim survey at the maximum possible load within 60 days of placing the station into service and provide the full load survey within 6 months. If the noise attributable to the operation of the equipment at the station under interim or full load conditions exceeds an Ldn of 55 dBA at the nearest NSA, Mountain Valley shall file a report on what changes are needed and shall install the additional noise controls to meet the level within 1 year of the in-service date. Mountain Valley shall confirm compliance with the above requirement by filing a second noise survey with the Secretary no later than 60 days after it installs the additional noise controls.*

**Implementation Plan for Environmental Condition No. 22**

No longer applicable; the Lambert Compressor Station has been removed from the Amendment Project.



### **1.2.6 Environmental Condition No. 6**

**Prior to construction**, Mountain Valley shall file with the Secretary, for review and written approval by the Director of OEP, or the Director's designee, its updated E&SC Plan.

#### **Implementation Plan for Environmental Condition No. 6**

Mountain Valley is in the process of finalizing its erosion and sediment control plans and will file them with FERC once complete.

### **1.2.7 Environmental Condition No. 7**

**Prior to construction**, Mountain Valley shall file with the Secretary, correspondence from the applicable state agencies regarding whether they approve the installation of slope breakers across the full width of the construction right-of-way.

#### **Implementation Plan for Environmental Condition No. 7**

The VADEQ *Virginia Stormwater Management Handbook* (VSMH) includes approved construction BMP specifications for slope breakers (waterbars) applicable to linear utility rights-of-way. These specifications allow installation of slope breakers across the full width of the construction right-of-way when designed and installed in accordance with the VSMH. Accordingly, slope breakers across the full width of the construction right-of-way are approved under current Virginia erosion and stormwater management standards.

### **1.2.8 Environmental Condition No. 8**

**Prior to construction**, Mountain Valley shall file with the Secretary, for review and written approval by the Director of OEP, or the Director’s designee, an updated *Mountain Valley Southgate Pipeline Stream Burial Recommendations*. The revised document shall resolve all discrepancies with the waterbody crossing table, utilize Mountain Valley’s waterbody IDs, and clarify whether Mountain Valley would implement Geosyntec’s recommendations.

#### **Implementation Plan for Environmental Condition No. 8**

Mountain Valley has included herewith as Attachment IP-4 an updated *Mountain Valley Southgate Pipeline Stream Burial Recommendations* (Geosyntec Report).

#### **Geosyntec Report and Mountain Valley’s Waterbody Crossing Table**

In the EA, Commission Staff noted that “Geosyntec provided stream-specific recommendations for 83 stream crossings; however, the waterbody crossing table provided by Mountain Valley included 88 pipeline stream crossings.” The discrepancy in waterbody crossing numbers was due to the fact that the Geosyntec Report did not include certain waterbodies where the pipeline centerline would not impact the waterbody (e.g., a stream runs parallel to the proposed pipeline, so Geosyntec burial depths do not apply), whereas Mountain Valley’s waterbody crossing table included all streams in the construction workspace area.

Mountain Valley has reviewed all stream crossings listed in the original Geosyntec Report. Upon further review, there were three streams included in the original Geosyntec Report that have been removed from the updated report because they are either avoided (S-A030 and S-B053) or are no longer considered to be streams (W-A068). Mountain Valley affirms that the report included herewith as Attachment IP-4 now accurately reflects 80 streams to be crossed by the Amendment Project pipeline.

#### **Mountain Valley Waterbody IDs**

Attachment IP-4 has been revised to use Mountain Valley Waterbody IDs. Please refer to column “MVP Waterbody ID” in Tables A-1, A-2, and A-3.

#### **Implementation of Geosyntec’s Recommendations**

Mountain Valley affirms that it will implement the recommendations contained in the updated Geosyntec Report (Attachment IP-4), including the stream crossing burial depth and stream bank setback for all the stream crossings along the pipeline route.

### **1.2.9 Environmental Condition No. 9**

**Prior to construction**, Mountain Valley shall file with the Secretary, for review and written approval by the Director of OEP, or the Director's designee, mitigation measures to reduce nighttime noise levels at all 24-hour conventional bores to less than 48.6 dBA  $L_{eq}$ . Mountain Valley shall also revise its *Nighttime Construction Noise Mitigation Plan* to include all 24-hour conventional bore locations.

#### **Implementation Plan for Environmental Condition No. 9**

Mountain Valley is in the process of updating its *Nighttime Construction Noise Management Plan* as requested as part of this environmental condition. Within that plan, additional mitigation measures to reduce nighttime noise levels may be included. A revised *Nighttime Construction Noise Management Plan* will be filed with FERC once complete.

### 1.2.10 Environmental Condition No. 10

Mountain Valley shall file a noise survey with the Secretary **no later than 60 days** after placing the Dan River Interconnect #1 and the Dan River Interconnect #2 into service. If a full flow rate noise survey at the station's maximum design capacity is not possible, Mountain Valley shall provide an interim survey at the maximum possible flow rate and provide the full flow rate survey **within 6 months**. If the noise attributable to the operation of the Dan River Interconnects #1 and #2 exceeds an  $L_{dn}$  of 55 dBA at any nearby NSA, Mountain Valley shall file a report on what changes are needed and shall install additional noise controls to meet the level **within 1 year** of the in-service date. Mountain Valley shall confirm compliance with this requirement by filing a second noise survey with the Secretary **no later than 60 days** after it installs the additional noise controls.

#### Implementation Plan for Environmental Condition No. 10

Mountain Valley will file a noise survey with the Secretary no later than 60 days after placing the Dan River Interconnect #1 and the Dan River Interconnect #2 in service, or if not possible, will file an interim survey at the maximum possible flow rate and then file the full flow rate survey within 6 months. If the sound level attributable to the operation of the Dan River Interconnects #1 and #2 exceeds an  $L_{dn}$  of 55 dBA at any nearby noise sensitive area ("NSA"), Mountain Valley will file a report on what changes are needed, and Mountain Valley will confirm compliance with these requirements by filing a second survey with the Secretary no later than 60 days after it installs noise controls.



## **MVP Southgate Amendment Project**

Docket No. CP25-60-000

### **Attachment IP-1**

### **Affirmative Statement**

*(Provided Under Separate Cover)*

January 2026



## **MVP Southgate Amendment Project**

Docket No. CP25-60-000

### **Attachment IP-2**

## **Permits and Authorizations for the Amendment Project**

*(Provided Under Separate Cover)*

January 2026



## **MVP Southgate Amendment Project**

Docket No. CP25-60-000

### **Attachment IP-3**

### **Agency Correspondence**

*(Provided Under Separate Cover)*

January 2026



## **MVP Southgate Amendment Project**

Docket No. CP25-60-000

### **Attachment IP-4**

## ***Revised Mountain Valley Southgate Pipeline Stream Burial Recommendations***

*(Provided Under Separate Cover)*

January 2026