

Freeda Cathcart
District Director representing Roanoke City on the district Soil and Water Conservation Board
Roanoke, VA

Michael Yingling
Chief Deputy State Fire Marshal
Sent via email to Michael.Yingling@vdfp.virginia.gov

August 16, 2021

RE: Emergency request to suspend Mountain Valley Pipeline blasting permit for Bent Mountain

Dear Chief Deputy Yingling,

Reason for Request - Mountain Valley Pipeline (MVP) currently doesn't have a permit to be able to cross water bodies. It appears that MVP is ignoring the evidence that they are about to blast through a possible aquifer. This section of Bent Mountain contains the headwaters for the [Spring Hollow Reservoir](#), built in 1996 to provide water security for the Roanoke Valley. Spring Hollow Reservoir is 158 acres holding 3.3 billion gallons of water and is a side-stream reservoir dependent on the tributaries to the Roanoke River. The cost was \$73 million dollars to build it.

Before the State Fire Marshal issued a permit to MVP to blast in the land containing the headwaters for the Spring Hollow Reservoir, was there an investigation and assessment for potential harm to the reservoir? Has MVP acquired insurance or a bond to cover any potential harm to the reservoir up to what the current cost would be to replace the reservoir?

If the answer is no to the above questions, then please immediately suspend MVP's permit for blasting until there can be an investigation and assurances that the Roanoke Valley's water security will be protected during the execution of the MVP project.

History - On Tuesday August 10, 2021, MVP hit water when drilling blasting holes on Bent Mountain. The landowner had warned them that they were drilling between a spring and a stream in wetlands. Since there's a drought in that area, the wetlands were dry on the surface. The landowner (a civil engineer) knew MVP had hit an aquifer, when the stick showed a watermark of several feet.

On August 11, 2021 the media, neighbors and friends showed up and witnessed MVP ignoring the questions from a journalist asking the workers if they knew they had hit an aquifer and if they knew that MVP didn't have a permit to cross water bodies. MVP proceeded to drill even more holes for blasting.

With scattered lightning storms in the region, MVP dropped explosives into holes uphill from the water filled holes. After the landowner filed an injunction request with the federal court to stop blasting until a

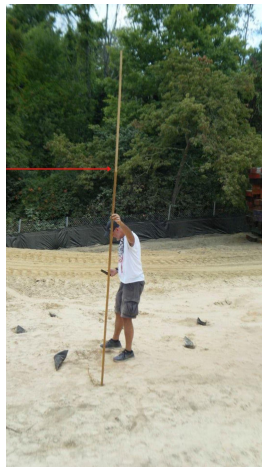
hydrologist could evaluate the situation. MVP's lawyer, the landowner's lawyer and the judge came to an agreement that MVP wouldn't blast until after the judge made a decision on August 13, 2021.

The judge ruled that the case didn't belong in her court and that it needed to be addressed by the regulatory agencies. Later that day, the landowner learned that MVP had blasted in the middle of the night (Aug. 11-12) without warning. From a letter MVP's lawyer filed on the FERC docket on Aug. 12:

"Mountain Valley determined in consultation with federal and state officials that exigent circumstances required that the live charges be fired. The forecast indicated a possibility of storms. The potential for lightning to strike live explosives posed an unacceptable safety risk for the public as well as the personnel securing the site. Similarly, the potential for precipitation on a section of the right-of-way without proper controls presented an environmental risk."

The above statement is incongruent with MVP's execution of their project on the morning of August 11. I was on site and recorded this [video](#) asking to speak to a supervisor to find out why they had removed the erosion and sediment controls and were in the process of unloading explosives to put into the holes when a storm was only 20 minutes away and more storms were in the forecast. The location for this video was uphill from the drilling holes in the wetland area that had water in them. During the day an AEP truck was on site because the location was near their high voltage transmission lines. Having a background in insurance, the MVP workers appeared to be dismissive of the inherent dangers to themselves and the public observing them.

This is a [video](#) taken on Aug. 11 warning the MVP workers that they were drilling into an aquifer and that they didn't have a permit for water bodies. This [video](#) taken on Aug. 12 shows approximately 50 additional holes that MVP drilled near the holes with water. This [video](#) and picture below was taken after those holes were drilled showing the water level had not lowered, the red arrow points to the water mark:



A certified professional soil scientist said that MVP was trying to compromise the evidence by drilling approximately 50 additional holes and that MVP had penetrated an aquifer. The scientist warned that blasting could alter the flow of water from the aquifer because Bent Mountain is on a water divide. This means that the flow of water to the Spring Hollow Reservoir could be in danger of being diverted to another watershed if blasting is allowed.

At the end of the letter August 12 MVP filed on the FERC docket was a memoranda by geotechnical karst consultant Draper Aden that had the following information:

"Please note that Draper Aden Associates has not had the opportunity to conduct a site visit to the Terry property since the complaint was raised."

This is not reassuring. Considering the high stakes at risk it's reasonable to pause blasting in this area until an investigation can be conducted on site by a qualified hydrologist. The investigation must include an assessment of potential impacts to the watershed for the Spring Hollow Reservoir. It would also be good to investigate if MVP is implementing safe blasting procedures or putting their workers and the public at unnecessary risk.

Thank you for your immediate attention to this important matter.

Sincerely,

Freedra Cathcart