

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

CLETUS WOODROW AND )  
BEVERLY ANN BOHON, *et al.*, )

*Appellants,* )

v. )

FEDERAL ENERGY )  
REGULATORY )  
COMMISSION, *et al.*, )

*Appellees.* )

**No. 20-5203**

On appeal from

1:20-cv-00006-JEB (D.D.C.)

**DECLARATION OF AIMEE CHASE HAMM**

I, Aimee Chase Hamm, of Bent Mountain, Virginia, hereby depose and state that I am over the age of 18 and am in all respects competent and qualified to make this Declaration. All facts stated are within my personal knowledge and are true and correct.

1. My husband, Robert Matthew Hamm, and I live on Bent Mountain, Virginia, a beautiful mountainous area located in Roanoke County in rural Southwest Virginia.

2. My husband and I have lived in this home for 20 years. I was brought home to Bent Mountain as a newborn and spent weekends and summers here with my family since 1975.

3. I have personal knowledge of MVP's recent activities on our land.

4. I have taken lots of pictures and videos of what has been happening here in recent weeks. My pictures are attached. They show the disturbances and destruction on and around our property on Bent Mountain. We are devastated with this situation.

5. The state of construction is as follows:

a. ***Access easement; daily use of vehicles & heavy equipment.***

MVP is using our land to access other parcels on Bent Mountain. I do not know the exact number, but my best estimate is that there are between 20-40 vehicles passing through here daily. These vehicles include heavy, earth-moving equipment, cranes, bulldozers, and trucks.

b. ***Pipe.*** There are large sections of pipe laying around. These pipes were delivered via tractor-trailers that made their way up the mountain carrying two or three sections of pipe with each load.

c. ***Trenches.*** No trenches are dug yet.

d. ***Blasting.*** It disturbed my daughter-in-law and her newborn.

e. ***People.*** I do not know the exact number, but I would estimate there are about 50-60 MVP workers wandering around here every day.

f. ***Speeding; endangering children, grandchildren, dogs, horses.*** MVP's vehicles have been speeding recklessly up the mountain and through our property, endangering our children, grandchildren, dogs, and horses. We asked them to slow down multiple times. It was so bad we contacted security and asked them to put up a radar.

g. ***Noise disturbing newborn.*** This heavy equipment makes a lot of noise every day. It really upsets my children and my newborn granddaughter, who was born in September.

6. My late father, Fred Vest, a patriot and Vietnam war veteran who passed away two years ago, called Bent Mountain his "Paradise." Dad loved his land. He named his farm Mountain Paradise Farm in 1972. It would break his heart to see what is happening on Bent Mountain.

I hereby state, under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this 15 day of October 2023.

  
Aimee Chase Hamm



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