

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

SECOND 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. Based on my personal observations, since October 17, 2023, it looks like MVP has increased activity on our land on Bent Mountain right after my lawyer filed an injunction request last week.

2. MVP even has workers here on a Sunday (October 22, 2023)!

3. I don't know why MVP is saying they are "unaware" of the

speeding issues; my husband and I have reported the serious speeding and drainage problems multiple times. MVP's land agent, Matt Clark, even told us he reported the speeding to the lead construction guy and would get security on it. MVP is definitely aware of the speeding issues. They are also aware of the drainage issues. We have complained multiple times. I even sent a detailed letter to Equitrans about it in August 2023.

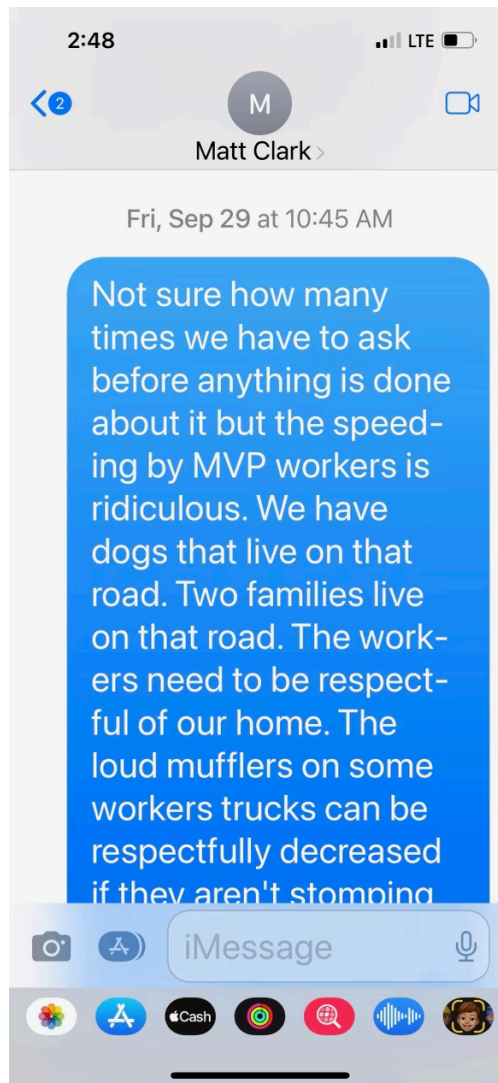
4. Based on my personal observations, MVP has a lot of work—and damage—left to do on the land. The trenches are not dug yet. The pipe is not in the ground. But MVP is definitely increasing activity here on Bent Mountain since my lawyer asked the court for an injunction.

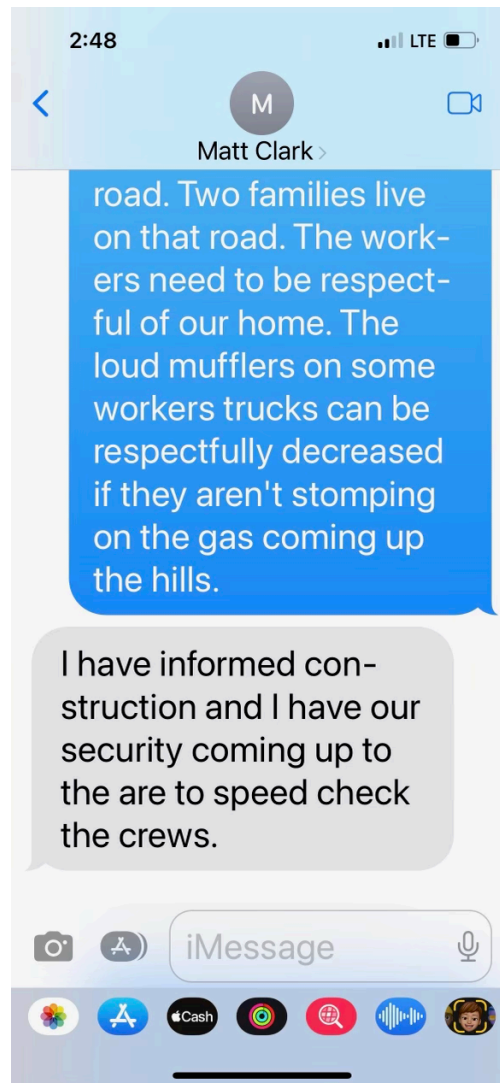
5. I have attached new pictures of work on Sunday, October 22 and a bus full of MVP workers leaving on Sunday.

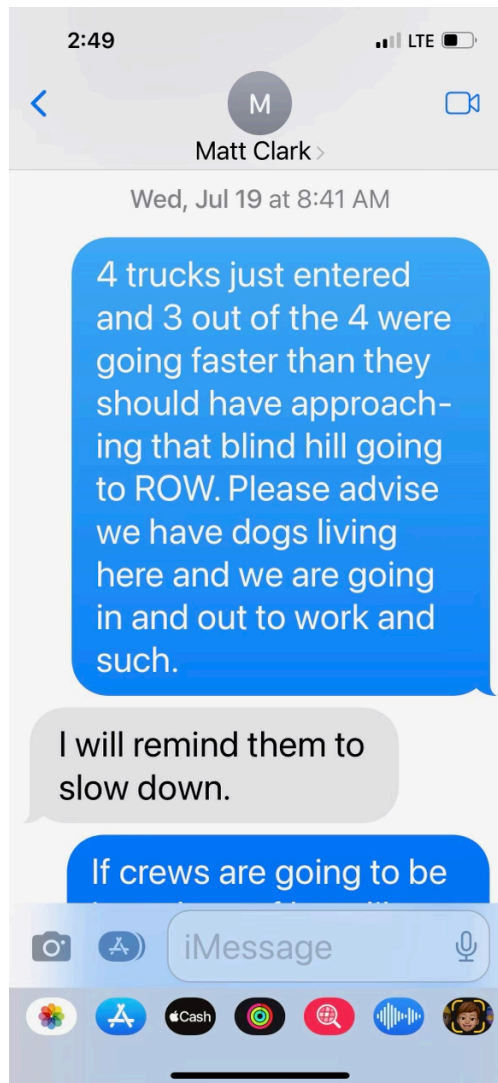
I hereby state, under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Executed this 23 day of October 2023.


Aimee Chase Hamm







2:45

Facebook



Navigation bar with back arrow, contact profile picture 'M', and video call icon. Contact name: Matt Clark >

Thursday 8:05 AM

A Sunburnt Toyota and the truck that came in before him that drove by so fast I couldn't even get a description. Are they getting paid on job site today or what? Where is security with the radar?

Delivered

Thursday 9:19 AM

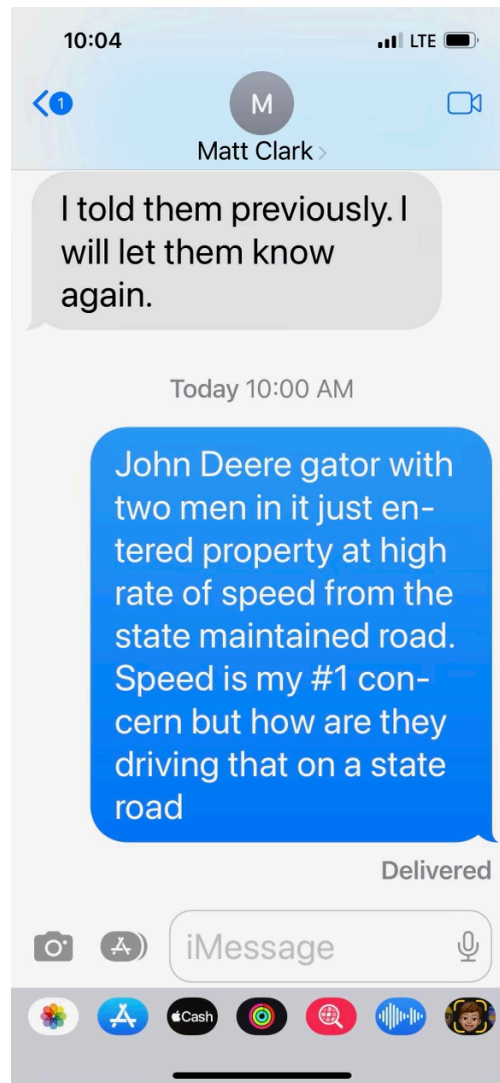
I spoke with the lead construction auv. He

iMessage input field with camera, app store, microphone, and share icons.











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Appellees.)

No. 20-5203

SECOND DECLARATION OF CLETUS WOODROW BOHON

I, Cletus Woodrow Bohon, of Montgomery County, 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. There is now even more activity on my land since our injunction motion last week. MVP is working hard to get the pipe laid out on our property. They were even here working on Sunday! I have attached pictures.

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 23rd day of October 2023.


Cletus Woodrow Bohon
Cletus Woodrow Bohon



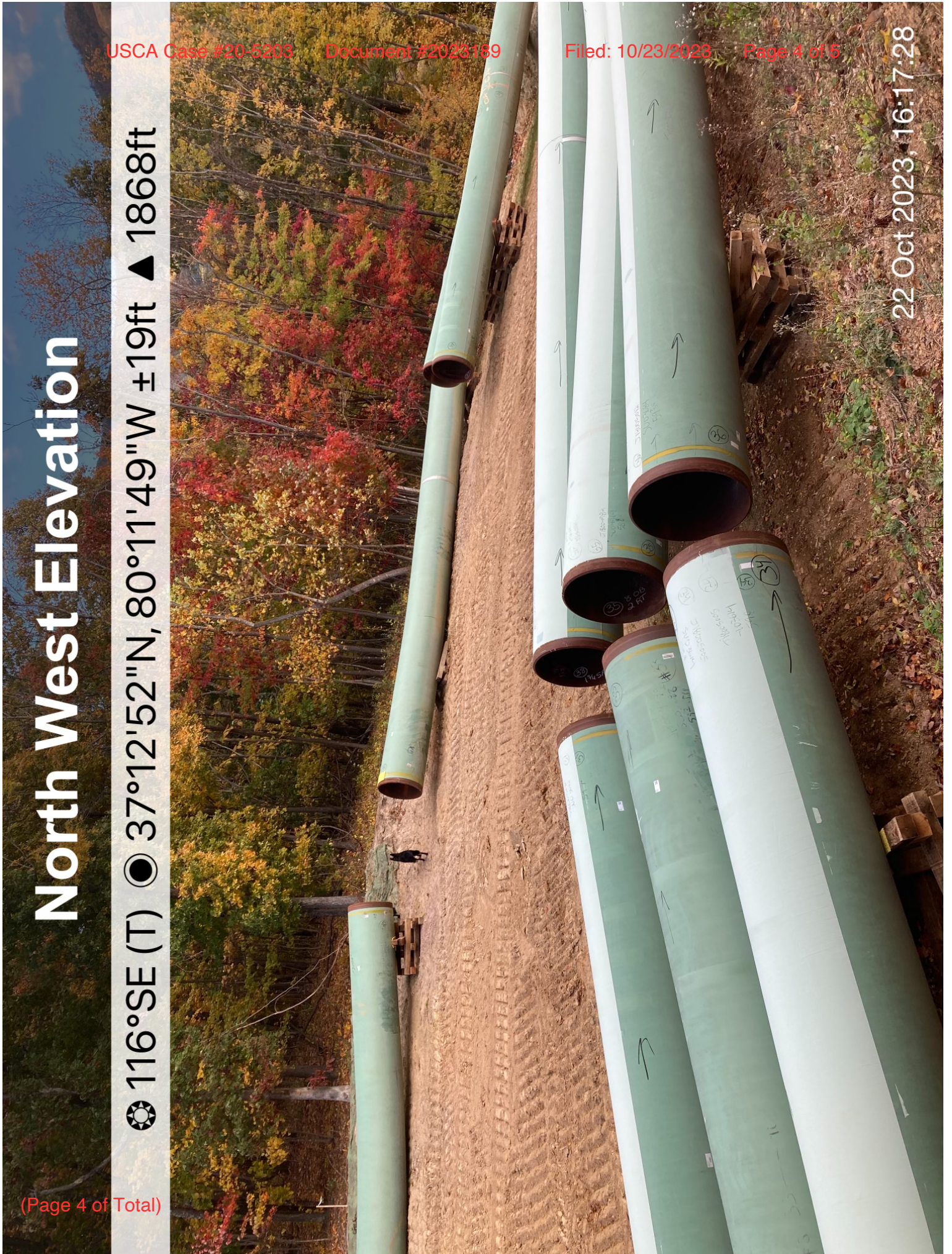
South Elevation

☉ 350°N (T) ☉ 37°12'43"N, 80°11'48"W ±16ft ▲ 1683ft



North West Elevation

☀ 116°SE (T) ☉ 37°12'52"N, 80°11'49"W ±19ft ▲ 1868ft

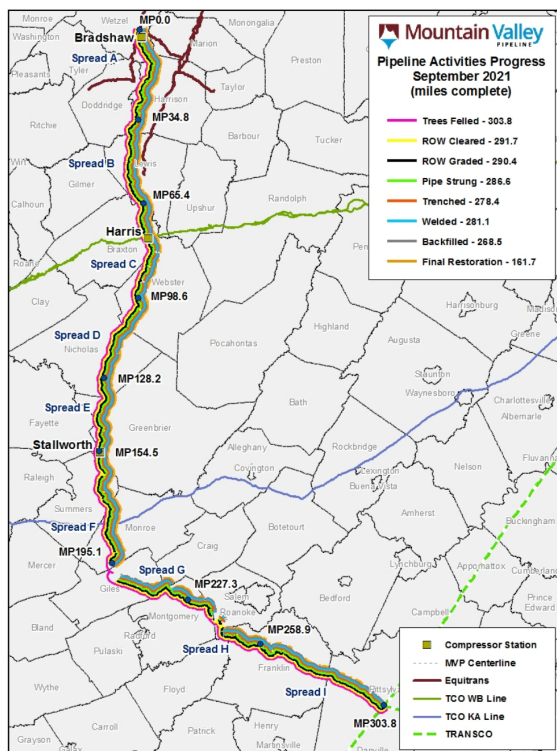


North Elevation

☉ 167°S (T) ● 37°12'51"N, 80°11'49"W ±13ft ▲ 1872ft



Exhibit I



The Mountain Valley Pipeline (MVP) project is a natural gas pipeline system that spans approximately 303 miles from northwestern West Virginia to southern Virginia – and as an interstate pipeline will be regulated by the Federal Energy Regulatory Commission (FERC). The MVP will be constructed and owned by Mountain Valley Pipeline, LLC (Mountain Valley), which is a joint venture of EQM Midstream Partners, LP; NextEra Capital Holdings, Inc.; Con Edison Transmission, Inc.; WGL Midstream; and RGC Midstream, LLC. EQM Midstream Partners will operate the pipeline and own a significant interest in the joint venture.

With a vast supply of natural gas from Marcellus and Utica shale production, the Mountain Valley Pipeline is expected to provide up to two million dekatherms per day of firm transmission capacity to markets in the Mid- and South Atlantic regions of the United States. The MVP will extend the Equitrans transmission system in Wetzel County, West Virginia, to Transcontinental Gas Pipeline Company's (Transco) Zone 5 compressor station 165 in Pittsylvania County, Virginia. As currently planned, the pipeline will be 42 inches in diameter and will require approximately 50 feet of permanent easement (with 125 feet of temporary easement during construction). In addition, the project will require three compressor stations, with identified locations in Wetzel, Braxton, and Fayette counties of West Virginia.

The pipeline will be governed by the United States Natural Gas Act, which requires a Certificate of Convenience and Necessity (Certificate) from the FERC. Mountain Valley received this Certificate on October 13, 2017 and construction activities began in early 2018. With an estimated 20 linear miles of pipe remaining, MVP's total project work is nearly 94% complete, which includes 53% of the right-of-way fully restored – the details of which are shown on the adjacent map.

[Interconnect Request Form](#)

[Interconnect Documents](#)

As significant interest owner and operator of the proposed pipeline, interconnect links will redirect users to the EQM Midstream Partners, LP Customer Portal.

State AG files criminal charges against Equitrans, faults company for 2018 home explosion

Jon Andreassi
Nov 1, 2023



Observer-Reporter

In this 2018 file photo, a Waynesburg-Franklin Township firefighter looks over the remnants of a Morgan Township home that exploded. State Attorney General Michelle Henry filed charges against Cecil Township-based Equitrans, alleging the company is responsible for the explosion. Henry will release additional details during a press conference scheduled later today.

The state attorney general's office filed charges Monday against Equitrans Midstream that accuse the company of causing a 2018 house explosion in Morgan Township, Greene County.

The Eden Township based company is charged with a felony for allegedly violating the Pennsylvania Clean Streams law, as well as misdemeanors for prohibited discharge of industrial waste and polluting.

The complaint alleges that natural gas leaked from a nearby storage well into the home's water well. Equitrans is also accused of failing to perform an investigation following the explosion.

The home at 161 Bowser Road exploded on Oct. 31, 2018. Cody White and his son James were injured as a result and flown to UPMC Mercy Hospital in Pittsburgh.

Equitrans denied responsibility in an emailed statement.

"First and foremost, Equitrans fully cooperated with this grand jury investigation, and we believe the substantial operational evidence that we presented to the state factually demonstrates that Equitrans' operations were not the cause of the incident," said Natalie Cox, the company's vice president of communications.

According to the criminal complaint, a grand jury that investigated the incident recommend charges last week. Attorney General Michelle Henry will be in Pittsburgh today for a press conference to discuss the charges.

Jon Andreassi

Staff writer