

## MEMORANDUM

September 14, 2019

TO: Federal Energy Regulatory Commission

FROM: Ann Rogers, Blue Ridge Environmental Defense League (BREDL)

RE: OEP/DG2E/Gas 3  
Mountain Valley Pipeline, LLC.  
Southgate Project  
Docket No. CP19-14-000

SUBJECT: Failure of Southgate Draft Environmental Impact Statement to document the Southgate pipeline's co-location with multiple uranium mining leases historically held by Marline Uranium Corporation in the uranium-rich Chatham fault zone

## INTRODUCTION

The Draft Environmental Impact Statement (DEIS) for the Southgate pipeline states in Section 4.1.4.8 (pages 4-12 and 4-13), "The closest economically viable uranium deposit to the Project is at Coles Hill in Pittsylvania County, Virginia, 3.5 miles north of the Lambert Compressor Station (Coles Hill, LLC). This deposit is exposed locally within Coles Hill and proceeds to dip and extend underground (RTII, 2012). No encounters with the Coles Hill deposit are anticipated as a result of Project-required excavation due to the deposit depth and distance from the Project. . . . Concentrations of uranium in sediment, soils, shallow bedrock, and groundwater near the Project workspace in Pittsylvania County are comparable to concentrations in environmental media in the conterminous United States. . . . Significant impacts on human health and the environment are not anticipated during construction and operation of the project."

This assessment offered by the DEIS fails to consider dozens of uranium mining leases that were held by Marline Uranium Corporation in the area in Pittsylvania County through which the Southgate pipeline has been routed.

Below we: (1) discuss the documentation of the Marline uranium mining leases conducted by Piedmont Residents in Defense of the Environment (PRIDE) in 2010 and 2011, (2) offer mapping to illustrate PRIDE's findings, and (3) offer additional evidence of the presence of economically viable uranium ore deposits that coincide with the geographic area now planned for construction of the Southgate pipeline.

## HISTORIC MARLINE LEASES COINCIDE WITH SOUTHGATE PIPELINE CORRIDOR

### *Research conducted by BREDL's chapter, PRIDE in 2010-11*

During 2010-11, members of PRIDE conducted research at the Pittsylvania County (VA) Real Estate Office to obtain documentation of leases held by Marline Uranium Corporation to conduct uranium mining in Virginia. Their research generated a database containing over 600 records of these historic Marline leases. PRIDE's research was shared with Piedmont Environmental Council in 2011, who used



the information to create the map in **Attachment 1** and several other maps illustrating the presence of former uranium mining leases in Pittsylvania County extending from the area northeast of the massive uranium deposit at Coles Hill in Chatham down to the southwestern corner of Pittsylvania County.

The map in **Attachment 2** illustrates the Southgate pipeline corridor and its proximity to the historic Marline leases. On the map, the Southgate pipeline corridor is indicated by the brown line extending from Chatham southwest to where the pipeline crosses into North Carolina. The red dots on the map indicate the locations of some of the Marline leases that were discovered by PRIDE to be on record with the Pittsylvania County government in 2010-11. The map illustrates only a small fraction of the 618 total leases documented by PRIDE in the communities of Hurt, Long Island, Gretna, Chatham, Dry Fork, Danville, Cascade, and Axton, VA.

The map clearly illustrates that the Southgate pipeline is planned for construction in a geographic area coinciding with dozens of Marline leases.

### ***Berry Hill Mega Park and Judy Byrd Mountain***

The public has long had knowledge of a large uranium deposit at the Berry Hill Mega Park and nearby Judy Byrd Mountain in southern Pittsylvania County, both of which are proposed to be crossed by the Southgate pipeline. In describing Pittsylvania Supervisor Tim Barber's position on uranium mining, an October 29, 2015 article appearing in the Danville Register & Bee states, "Barber opposes uranium mining because he doesn't think it's proven to be safe and it would decrease property values. Also, there is a large uranium deposit on Judy Byrd Mountain – adjacent to Berry Hill mega park – in southwestern Pittsylvania County that could be mined if the moratorium were lifted, he said."

The Pittsylvania County Board of Supervisors passed a resolution in June, 2010 prohibiting the mining or milling of uranium at the Berry Hill Mega Park. Please see copy of the supervisors' resolution in **Attachment 3**.

The Berry Hill Mega Park and Judy Byrd Mountain both appear on the map in **Attachment 2**.

The Southgate DEIS fails to consider the impacts of excavation and pipeline development through the sizable uranium deposit at Berry Hill and Judy Byrd Mountain.

### ***Perkins Mountain***

On August 29, a landowner whose property is proposed to be crossed by the Southgate pipeline disclosed to BREDL staff that his father had received payments for a uranium lease on Perkins Mountain, located west of the City of Danville. Perkins Mountain, illustrated on the map in **Attachment 2**, is crossed by the Southgate pipeline.

### ***Danville Triassic Basin***

In 2007, PAC Geological Consulting, Inc. issued a report titled, "Technical Report on the Coles Hill Uranium Property, Pittsylvania County, Virginia". The report, which was written for Virginia Uranium, Inc., the company seeking to mine the very large uranium deposit at Coles Hill, contains the following description of the geology of the Coles Hill deposit:



### **9.2 Property and Local Geology (Fig. 9.2)**

The property geology of the CHUP [Coles Hill Uranium Property] has been mapped by Marline geologists and Henika and Thayer (1983) and modified by Jerden (2001) . . . The Chatham Fault Zone has been mapped and studied by Lineberger (1983). The deposits are hosted within a fault-bounded wedge of Precambrian or Paleozoic mylonitic quartzofeldspathic gneiss and some amphibolite exposed along the Chatham fault zone at the faulted northwest margin of the Danville Triassic Basin. The augen gneiss is probably a tectonically and hydrothermally altered variety of biotite gneiss and mica schist of the Fork Mountain Formation. Initial cataclasis and brecciation along the Chatham fault zone resulted in hydrothermal events causing sodium metasomatism, chloritization, and argillization that may have been followed by hematization and uranium mineralization. The hydrothermal events coextend and are coeval with northerly trending Jurassic diabase dykes. Jerden and Sinha (1999) suggested that the Coles Hill uranium deposit formed within a structurally controlled, hydrothermal cell that developed during Mesozoic extension in response to a localized heat flux associated with mafic intrusive activity.

The report contains a map showing the Danville Triassic Basin associated with the Chatham fault zone in which, as described above, the uranium deposits at Coles Hill and elsewhere in Pittsylvania County are found. A copy of this map appears in **Attachment 4**. The Chatham fault zone is recognized by geologists as being rich in uranium ore deposits and potentially exploitable as an economic asset.

The DEIS should be revised to recognize that the Southgate pipeline has been routed through an area with a reputation among geologists as having rich potential for uranium mining.

### **REQUEST TO FERC**

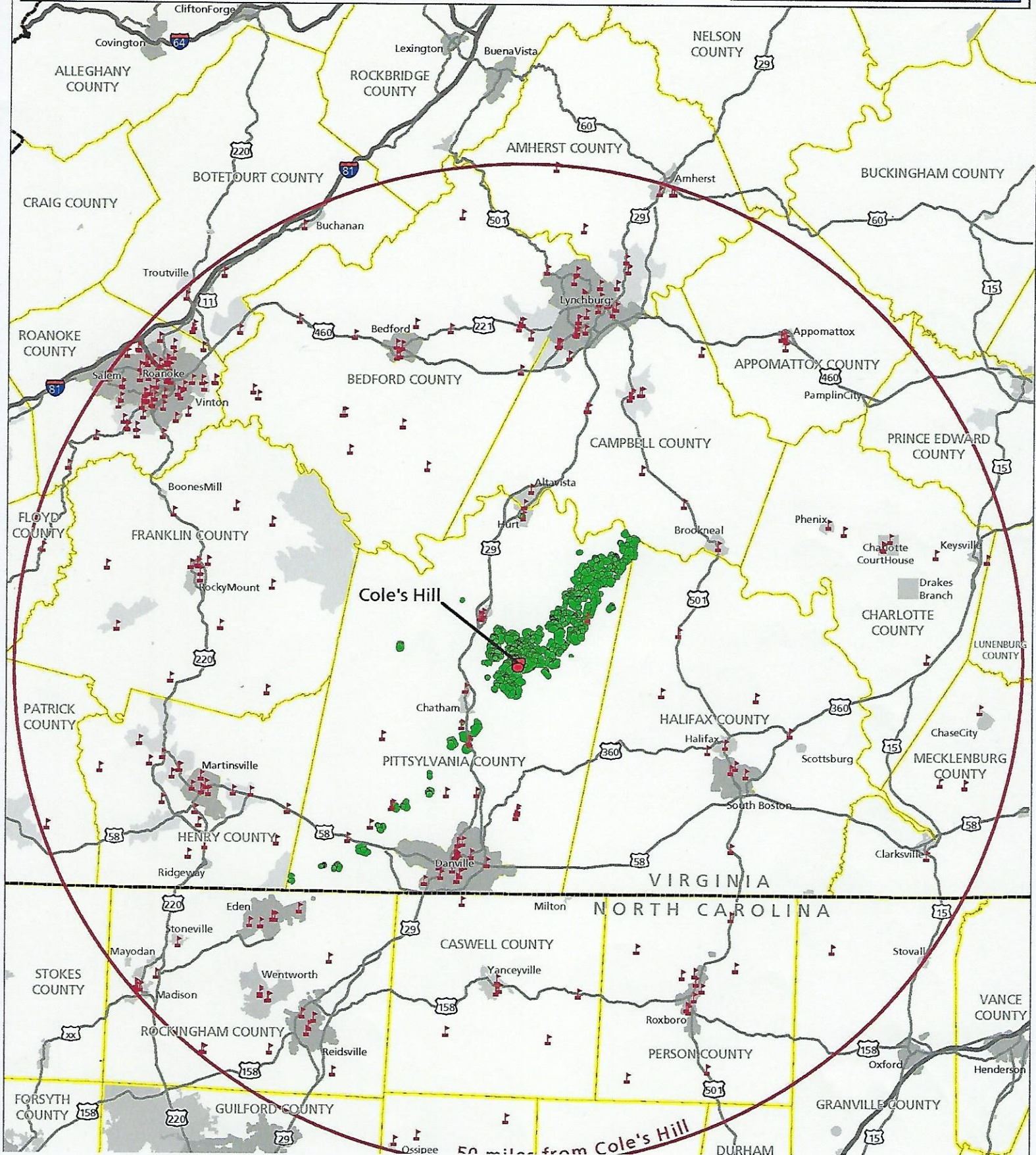
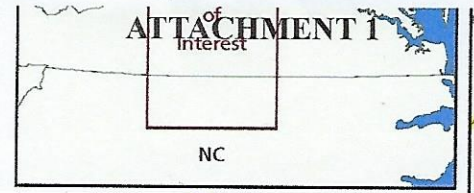
We request that FERC require Mountain Valley Pipeline, LLC to (1) revise the Southgate DEIS so that it recognizes that the Southgate has been routed through an area containing significant quantities of economically viable uranium, and (2) consider the environmental impacts of building the Southgate through an area with significant concentrations of uranium ore.



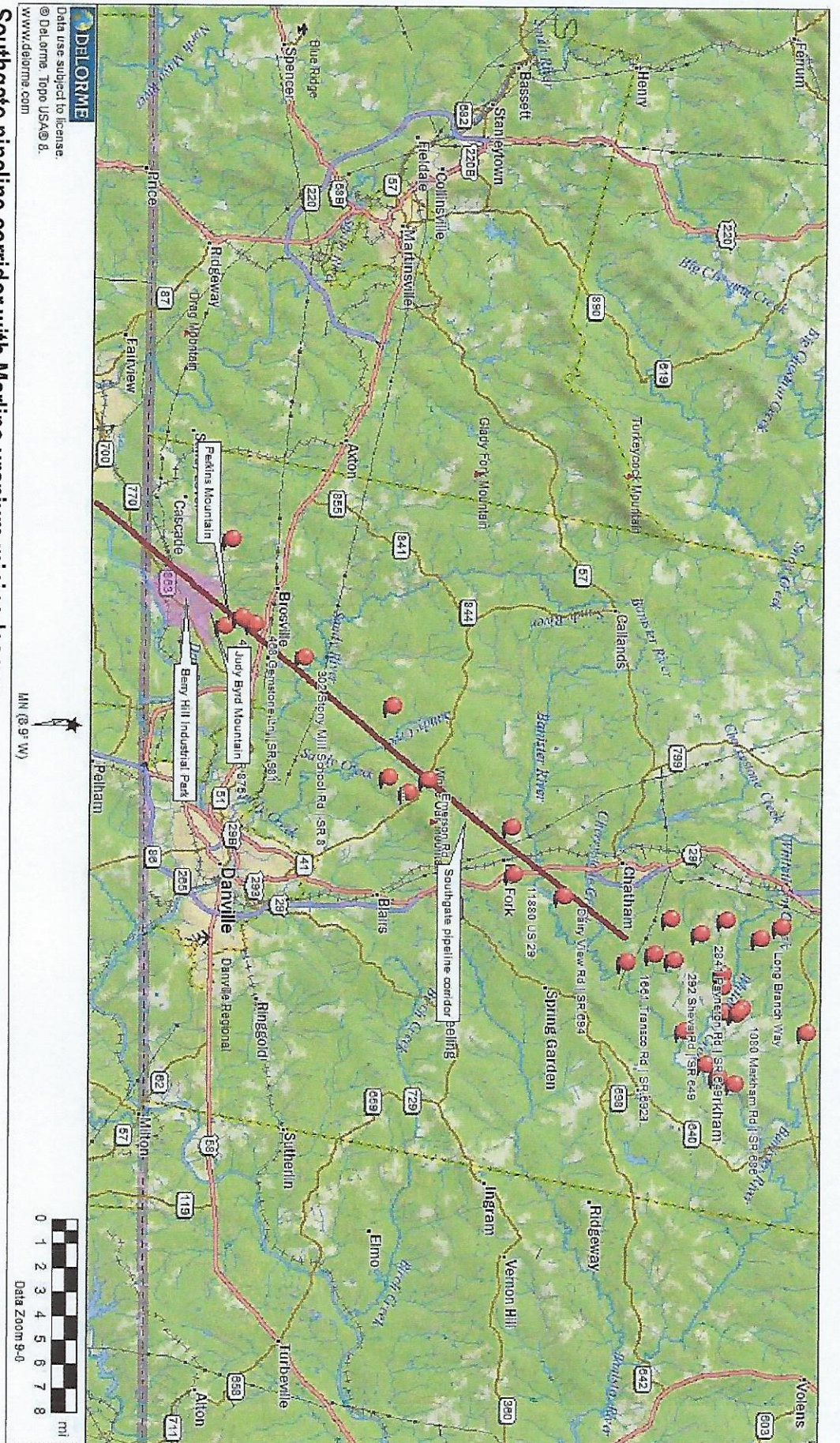
# Cole's Hill Potential Uranium Mine



Map created by PEC for presentation purposes only.  
Data source: Pittsylvania County, Virginia, the Commonwealth of Virginia and the State of North Carolina. Although efforts have been made to verify data, accuracy is not guaranteed.  
April 1, 2011 | Warrenton | JAM









## PITTSYLVANIA COUNTY BOARD OF SUPERVISORS

## RESOLUTION

2010-06-06

WHEREAS, Pittsylvania County has invested millions of dollar in the purchase and development of the "Mega Park" in the Berry Hill Community in the southwestern area of the County through its partnership in the Danville Pittsylvania County Regional Industrial Facilities Authority incorporating the acquiring of real estate and consultant designs for environmental impacts, utilities, and infrastructure; and

WHEREAS, it is the intent of the County and the Danville Pittsylvania County Regional Industrial Facilities Authority to develop this park to provide new jobs and enhance the economic stability of the region by locating new industrial prospects; and

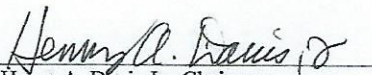
WHEREAS, it is imperative that those Industrial prospects have the confidence that their investments will not be compromised by mining and milling operations in the Mega Park; and

WHEREAS, it is the responsibility of the County and the Danville Pittsylvania County Regional Facilities Authority to protect the investment of the citizens of Pittsylvania County and the City of Danville; then

BE IT HEREBY RESOLVED, that the Pittsylvania County Board of Supervisors respectfully request the Board of Directors of the Danville Pittsylvania County Regional Industrial Facilities Authority to include in the covenants of the Mega Park, "No mining or milling operations".

Given under my hand this 7th day of June, 2010.



  
Henry A. Davis Jr. Chairman  
Pittsylvania County Board of Supervisors

  
William D. Sleeper, Clerk  
Pittsylvania County Board of Supervisors



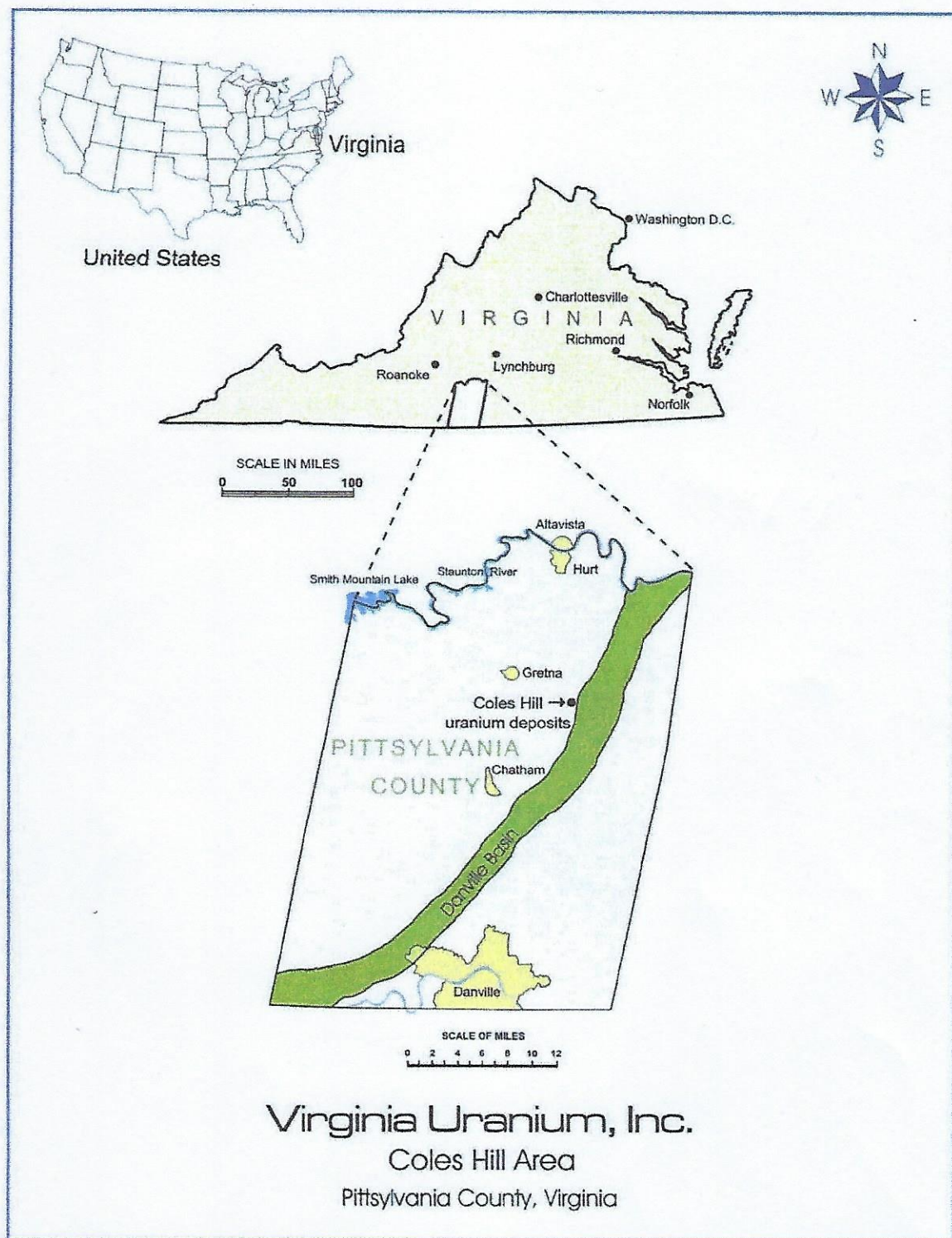


Figure 6.1 General Location of the Danville Basin and Coles Hill Uranium Deposit in Pittsylvania County, Virginia.