IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 22-1000

MOUNTAIN VALLEY PIPELINE, LLC,
Petitioner,

v.

VIRGINIA STATE AIR POLLUTION CONTROL BOARD, et al.,
Respondents.

SIERRA CLUB & APPALACHIAN VOICES' UNOPPOSED MOTION FOR LEAVE TO INTERVENE AS RESPONDENTS

Under Rules 15(d) and 27 of the Federal Rules of Appellate Procedure, Sierra Club and Appalachian Voices (collectively, the Movants) request leave to intervene as Respondents in the above-captioned case. No party opposes this motion.

I. INTRODUCTION

On December 3, 2021, the Virginia State Air Pollution Control Board (the Board) denied an application filed by Mountain Valley Pipeline, LLC (MVP) for a minor new source review air permit for the proposed 27,000-horsepower Lambert Compressor Station in Pittsylvania County, Virginia—a component of the MVP

Southgate Project. On December 31, 2021, MVP filed a petition for review of the Board's decision under the Natural Gas Act's judicial review provision, 15 U.S.C. § 717r(d). Because their members have substantial interests in resources that would be adversely impacted if the Board's decision were overturned and construction allowed to proceed, the Sierra Club and Appalachian Voices now move to intervene. Neither MVP nor the Board will adequately protect the Movants' unique interests.

In accordance with Local Rule 27(a), the Movants' counsel has discussed their request with counsel for MVP and counsel for the Board. MVP consents to the Movants' intervention subject to certain conditions regarding the length and number of merits briefs,[1] all of which are acceptable to the Movants.

II. FACTUAL BACKGROUND

MVP seeks to overturn the Board's denial of its application for a minor new source review air permit covering the proposed Lambert Compressor Station, a component of the MVP Southgate Project. Although that Project is generally regulated by the Federal Energy Regulatory Commission (FERC) under Section 7

1 Specifically, MVP consents to the Movants' intervention on the condition that: (1) the allowable length of MVP's reply brief shall be the longer of (a) 50% of the total combined length of the principal briefs filed by the Respondents and the Respondent-Intervenors or (b) the length specified by Federal Rule of Appellate Procedure 32; and that (2) all Respondent-Intervenors join a single principal brief separate from the State Respondents.

of the federal Natural Gas Act, 15 U.S.C. § 717f(c), it must also comply with all applicable state and federal air quality programs, *id.* § 717b(d)(1). For facilities in Virginia, that means obtaining the appropriate pre-construction permit from the Board, which administers Virginia's State Implementation Plan (SIP) under the Clean Air Act, 42 U.S.C. §§ 7401–7671q. And for facilities like the Lambert Station that emit air pollution at levels between certain regulatory thresholds, Virginia's SIP requires a permit under Article 6 of the Board's permitting regulations, 9 VAC §§ 5-80-1100—1300.

MVP applied for an Article 6 permit in September 2020, and the Virginia Department of Environmental Quality developed a draft permit to submit for consideration by the Board. The Movants responded to the draft permit with extensive comments, detailing multiple technical and regulatory deficiencies in the Department's review. *See generally* Comments of Chesapeake Bay Foundation & Appalachian Mountain Advocates on behalf of Sierra Club and Elizabeth & Anderson Jones, Re: Mountain Valley Pipeline, Registration No. 2165 (April 9, 2021), available at https://www.deq.virginia.gov/home/showpublisheddocument/8516/637547045496270000. As most relevant here, the Movants noted that the Station would emit carcinogens like fine particulate matter and formaldehyde near at least four communities recognized as "environmental justice communities"

under the Virginia Environmental Justice Act. *Id.* at 48–53 (citing Virginia Code § 2.2-234). The Movants then explained that some of the pollutants that the Station would emit are "non-threshold pollutant[s], meaning there is no level below which there are no adverse effects from added particle air pollution exposure." *Id.* at 64. As such, the Movants explained that the Station would necessarily "cause an increase in the risk of adverse health effects" for the "socio-economically disadvantaged populations living within the most affected areas surrounding the facility." *Id.* at 58. And although Virginia law required the Board ensure "fair treatment and meaningful involvement" of environmental justice communities in its decisionmaking process, the Movants noted that MVP had conducted only "a limited inventory of the surrounding community." *Id.* at 49.

Following a two-day meeting, the Board denied MVP's permit application by a 6-1 vote. ECF No. 3-2. In its written decision, the Board concluded that the community impacted by the Station is, in fact, "an environmental justice community" and that MVP had failed to demonstrate compliance with "the fair treatment requirements of the Virginia Environmental Justice Act." *Id.* The Board also concluded that the site proposed for the Station was "not suitable in light of the requirements of the *Friends of Buckingham [v. State Air Pollution Control Board*,

947 F.3d 68 (2020)] decision, the Virginia Environmental Justice Act, and Virginia Code Section 10.1-1307.E." *Id.*

On December 31, 2021, MVP petitioned this Court for review of the Board's decision denying the Article 6 permit. ECF No. 3.

III. ARGUMENT & AUTHORITIES

Federal Rule of Appellate Procedure 15(d) allows for intervention by interested parties in the direct appellate review of an agency order. The Rule requires the movant to provide "a concise statement of its interest and the grounds for intervention." Because the Rule does not provide a precise standard for intervention, "appellate courts have turned to the rules governing intervention in the district courts under Fed. R. Civ. P. 24." *Sierra Club v. Environmental Protection Agency*, 358 F.3d 516, 517–18 (7th Cir. 2004); *see also International Union, United Automobile, Aerospace & Agricultural Implement Workers of America, AFL-CIO, Local 283 v. Scofield*, 382 U.S. 205, 217 n.10 (1965); *Texas v. Department of Energy*, 754 F.2d 550, 552 (5th Cir. 1985). By that standard, a movant has a right to intervene if (1) its motion is timely; (2) it has an interest in the litigation; (3) the litigation may impair or impede the movant's ability to protect its interest; and (4) the litigation's parties do not adequately represent the movant's interest. Fed. R. Civ. P. 24(a); *Houston General Insurance v. Moore*, 193 F.3d 838, 839 (4th Cir. 1999). And in

applying that standard, "liberal intervention is desirable to dispose of as much of a controversy 'involving as many apparently concerned persons as is compatible with efficiency and due process.'" *Feller v. Brock*, 802 F.2d 722, 729 (4th Cir. 1986) (quoting *Nuesse v. Camp*, 385 F.2d 694, 700 (D.C. Cir. 1967)).

Sierra Club and Appalachian Voices satisfy all four requirements.

1. First, the Movants' intervention is timely because their motion is filed within the 30-day deadline for intervention under Rule 15(d). And given the early stage of the proceeding—prior to any briefing—the Movants' participation will not prejudice any other party to the appeal. *See Blue Water Baltimore v. Mayor & City Council of Baltimore*, 583 F. App'x 157, 158 (4th Cir. 2014).

2. Second, the Movants have substantial interests in defending the Board's decision below. "A public interest group is entitled as a matter of right to intervene in an action challenging the legality of a measure it has supported." *Idaho Farm Bureau Federation v. Babbitt*, 58 F.3d 1392, 1397 (9th Cir. 1995) (citing *Sagebrush Rebellion v. Watt*, 713 F.2d 525, 527 (9th Cir. 1983), *Washington State Building & Construction Trades Council v. Spellman*, 684 F.2d 627, 630 (9th Cir. 1982), cert. denied, *Don't Waste Washington Legal Defense Foundation v. Washington*, 461 U.S. 913 (1983)); *see also WildEarth Guardians v. National Park Service*, 604 F.3d 1192, 1198 (10th Cir. 2010) ("With respect to Rule 24(a)(2), we have declared it

'indisputable' that a prospective intervenor's environmental concern is a legally protectable interest.") (citing *San Juan County v. United States*, 503 F.3d 1163, 1199 (10th Cir. 2007) (en banc)); *Syngenta Seeds v. County of Kauai*, Civ. No. 14-00014BMK, ECF No. 54 (D. Haw. April 23, 2014) ("[W]here proposed intervenors assert an interest in environmental actions affecting their members, courts have generally found a significantly protectable interest to exist for purposes of intervention as of right.") (citing *American Farm Bureau Federation v. Environmental Protection Agency*, 278 F.R.D. 98, 106 (M.D. Pa. 2011), *California Dump Truck Owners Association v. Nichols*, 275 F.R.D. 303, 306–7 (E.D. Cal. 2011)).

Members of Sierra Club and Appalachian Voices live, work, and recreate in the vicinity of the proposed Lambert Compressor Station—and, more broadly, other components of the Southgate Project—and they use and enjoy the resources protected by the Board's decision. For example, one of the Movants' members lives near the site of the proposed compressor station in Chatham, Virginia, and within the zone of potential air quality impacts considered by the Board below. Aside from air quality impacts, the pipeline fueling the station would run through that member's property, dividing it into three segments and frustrate his plans to lease the land for timbering. Numerous other members of both Movants live in the

vicinity of the proposed station and other Southgate components, which together threaten the health, recreational, and economic interests of those members.

In order to protect those interests, the Movants have participated throughout the regulatory process for both the Southgate Project generally and the Lambert Station more specifically. *See*, *e.g.*, *Mountain Valley Pipeline v. North Carolina Department of Environmental Quality*, 990 F.3d 818, 826 n.4 (4th Cir. 2021) (granting the Movants' motion to intervene in MVP's appeal of a North Carolina decision denying a necessary water quality certification for the Southgate Project). As such, the movants, through their members, have the requisite "significantly protectable interest" to support their intervention. *See Teague v. Bakker*, 931 F.2d 259, 262 (4th Cir. 1991) (quoting *Donaldson v. United States*, 400 U.S. 517, 531 (1971)).

3. Third, this litigation could impair the Movants' ability to protect their interests. If a proposed intervenor "would be substantially affected in a practical sense by the determination made in an action, he should, as a general rule, be entitled to intervene." *Southwestern Center for Biological Diversity v. Berg*, 268 F.3d 810, 822 (9th Cir. 2001) (quoting Advisory Committee Notes to Fed. R. Civ. P. 24); *see also Jackson v. Abercrombie*, 282 F.R.D. 507, 517 (D. Haw. 2012) ("[G]enerally, after determining that the applicant has a protectable interest,

courts have 'little difficulty concluding' that the disposition of the case may affect such interest.") (quoting *Lockyer v. United States*, 450 F.3d 436, 442 (9th Cir. 2006)); *WildEarth Guardians*, 604 F.3d at 1199 ("The second element—impairment—presents a minimal burden."); *United States v. Exxonmobil*, 264 F.R.D. 242, 245 (N.D. W. Va. 2010) ("[T]he rule does not require, after all, that [potential intervenors] demonstrate to a certainty that their interests *will* be impaired in the ongoing action. It requires only that they show that the disposition of the action 'may as a practical matter' impair their interests.") (quoting *Little Rock School District v. Pulaski County Special School District*, 738 F.2d 82, 84 (8th Cir. 1984) (emphasis in original)).

With the Board's denial in place, the status quo is that MVP's Lambert Compressor Station cannot proceed as proposed. If MVP's challenge is successful, however, the Lambert Compressor Station—and the Southgate Project more generally—is far more likely to be built.[2] FERC's Environmental Impact Statement

2 The fact that, if MVP is successful, the Board would have another opportunity to review the permit application and could potentially deny that application on other grounds, does not nullify the threat to Movants' interests. *See generally Teague*, 931 F.2d at 261 (finding that a significantly protectable interest may include an interest contingent upon the outcome of other pending litigation); *Sierra Club v. State Water Control Board*, 898 F.3d 383, 400–02 (4th Cir. 2018) (finding Article III standing for environmental organizations to challenge issuance of Clean Water Act Section 401 certification for the Mountain Valley Pipeline, despite the fact that, "even were Petitioners to prevail on the merits

for the Project recognizes the enduring impacts were that to happen: "[L]ong-term air emissions would be generated during Project operation, most of which would be associated with operation of the new compressor station," and as a result, "ambient air quality in the area near the compressor station will degrade." Federal Energy Regulatory Commission, *Southgate Project Final Environmental Impact Statement*, Docket No. CP19-14 (February 2020) at 4-174, 4-188. The prospect of such concrete, adverse impacts to the Movants' interests is more than sufficient to satisfy the "minimal burden" to demonstrate impairment. *See WildEarth Guardians*, 604 F.3d at 1199.

4. Finally, the parties to this proceeding do not adequately represent the Movants' interests. The burden on the applicant of demonstrating a lack of adequate representation "should be treated as minimal," *Teague*, 931 F.2d at 262 (quoting *Trbovich v. United Mine Workers*, 404 U.S. 528, 538 n. 10 (1972)), and "the movant need not show that the representation by existing parties will definitely be inadequate," *JLS Inc. v. West Virginia Public Service Commission*, 321 F. App'x 286, 289 (4th Cir. 2009). Rather the movant need only show that such representation "may be" inadequate. *Id.* (quoting *Trbovich*, 404 U.S. at 538 n.10); *see also United*

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and we were to vacate the December 401 Certificate and remand for further proceedings, Petitioners would need to clear several additional hurdles to eventually obtain the ultimate relief that they seek").

States v. American Telephone & Telegraph, 642 F.2d 1285, 1293 (D.C. Cir. 1980) (stating that a petitioner "'ordinarily should be allowed to intervene unless it is clear that the party will provide adequate representation for the absentee'") (quoting 7A WRIGHT & MILLER, FEDERAL PRACTICE & PROCEDURE § 1909 (1972)); *Kozac v. Wells*, 278 F.2d 104, 110 (8th Cir. 1960) ("We emphasize here that a positive showing that such representation is inadequate is not necessary. The rule requires only that it may be inadequate."); 7C WRIGHT & MILLER, FEDERAL PRACTICE & PROCEDURE § 1909 (3d ed. 2002) ("[S]ince the rule is satisfied if there is a serious possibility that the representation may be inadequate, all reasonable doubts should be resolved in favor of [intervention.]").

As the proponent of the Project and the party seeking to construct a source of air pollution in Pittsylvania County, MVP plainly does not represent the Movants' interests in preventing pollution associated with the Compressor Station or the Project more generally. Nor does the Board itself adequately represent those interests. While the Board's primary interest is in protecting its decisional processes, the Movants' members have a much more direct and personal interest in the specific environmental, scenic, and recreational resources that would be affected by the Project and a firm commitment to opposing the Project. *See In re Sierra Club*, 945 F.2d 776, 780 (4th Cir. 1991) (overturning district court's denial of

Club's motion to intervene on behalf of South Carolina in a case involving hazardous waste regulation and explaining that the "Club appears to represent only a subset of citizens concerned with hazardous waste" such that it "does not need to consider the interests of all South Carolina citizens and it does not have an obligation, though [South Carolina] does, to consider its position vis-a-vis the national union."); *JLS Inc.*, 321 F. App'x at 290 ("[E]ven when a governmental agency's interests appear aligned with those of a particular private group at a particular moment in time, 'the government′s position is defined by the public interest, [not simply] the interests of a particular group of citizens.'") (quoting *Feller*, 802 F.2d at 730); *Mille Lacs Band of Chippewa Indians v. Minnesota*, 989 F.2d 994, 1001 (8th Cir. 1993) (finding that proposed intervenors with interests in specific lands, despite wishing to support the government's underlying decision affecting those and other lands, had "narrower and more parochial interests than the sovereign interest the state asserts in protecting fish and game" such that its interests were not adequately represented); *Cooper Technologies v. Dudas*, 247 F.R.D. 510, 515 (E.D. Va. 2007) ("When a party to an existing suit must represent multiple and distinct interests, those multiple interests may dictate a different approach to the litigation, and a party representing one of those interests exclusively should be allowed to intervene.") (citing *United Guaranty Residential*

Insurance of Iowa v. Philadelphia Savings Fund Society, 819 F.2d 473, 475–76 (4th Cir. 1987)); *American Petroleum Institute v. Cooper*, No. 5:08-CV-396-FL, 2009 WL 10688053, at *4 (E.D.N.C. February 27, 2009) ("[T]here remains a sufficient divergence in interests between the state, representing all members of the public, including consumers as well as retailers and distributors, and the NCPCMA, representing only members of the association, that it cannot be said the state adequately represents NCPCMA's interests."). The Board may choose litigation strategies—such as agreeing to settle or choosing not to appeal an adverse ruling in this Court—that conflict with the Movants' interests. *See JLS Inc.*, 321 F. App'x at 290–91 ("[I]f Movants' intervention is denied, [the state agency] could settle this case in a manner that could harm Movants' interests"); *Feller*, 802 F.2d at 730 (favoring intervention over participation as amicus curiae because "[a]micus participants are not able to make motions or to appeal").[3] The Movants thus satisfy all the elements for intervention as of right.

In the alternative, the Court should allow permissive intervention, which is appropriate whenever a motion to intervene (1) is timely; (2) reflects a claim or

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3 Because the Board will not adequately represent their interests in this appeal, the Movants also request leave under Local Rule 12(e) to file a brief separate from the Board. Consistent with MVP's consent to this Motion—*see* note 1, *supra*—however, the Movants are agreeable to joining with other intervenor-respondents in filing a single brief.

defense with a question of law or fact in common with the main action; and (3) will not prejudice the rights of the original parties or cause undue delay. Fed. R. of Civ. P. 24(b); *In re Sierra Club*, 945 F.2d at 779. The Movants satisfy all three requirements. First, the Movants' request is timely filed within the 30-day requirement under Rule 15(d). Second, the Movants are determined to vigorously defend the Board's denial of a new source air permit. Finally, the existing parties will not be prejudiced because, if granted intervention, Movants will participate on the same briefing and oral argument schedule as MVP and the Board.

IV. CONCLUSION

The Sierra Club and Appalachian Voices satisfy the requirements for both of-right and permissive intervention under Rule 24 of the Federal Rules of Civil Procedure, which the federal courts typically consult in resolving motions under Federal Rule of Appellate Procedure 15(d). As such, the Movants respectfully request leave to intervene as respondents.

Dated: January 31, 2022

Respectfully submitted,

/s/ Evan Dimond Johns

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Counsel for the Sierra Club and Appalachian Voices

CERTIFICATE OF COMPLIANCE

I certify that this motion complies with the typeface requirements of Federal Rule of Appellate Procedure 32(a)(5) and the type-volume limitations of Federal Rule of Appellate Procedure 27(d)(2)(A). This motion contains 3146 words, excluding the portions identified in Federal Rules of Appellate Procedure 27(d)(2) and 32(f).

/s/ Evan Dimond Johns

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CERTIFICATE OF SERVICE

I certify that on January 31, 2022, I electronically filed the foregoing Sierra Club & Appalachian Voices' Unopposed Motion for Leave to Intervene as Respondents with the Clerk of Court using the CM/ECF System, which will automatically send e-mail notification of such filing to all counsel of record.

/s/ Evan Dimond Johns

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Counsel for the Sierra Club
and Appalachian Voices

UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

DISCLOSURE STATEMENT

- In civil, agency, bankruptcy, and mandamus cases, a disclosure statement must be filed by **all** parties, with the following exceptions: (1) the United States is not required to file a disclosure statement; (2) an indigent party is not required to file a disclosure statement; and (3) a state or local government is not required to file a disclosure statement in pro se cases. (All parties to the action in the district court are considered parties to a mandamus case.)
- In criminal and post-conviction cases, a corporate defendant must file a disclosure statement.
- In criminal cases, the United States must file a disclosure statement if there was an organizational victim of the alleged criminal activity. (See question 7.)
- Any corporate amicus curiae must file a disclosure statement.
- Counsel has a continuing duty to update the disclosure statement.

No. 22-1000 Caption: Mountain Valley Pipeline LLC v. Va. State Air Pollution Control Board

Pursuant to FRAP 26.1 and Local Rule 26.1,

Sierra Club
(name of party/amicus)

____

who is an intervenor, makes the following disclosure:
(appellant/appellee/petitioner/respondent/amicus/intervenor)

1. Is party/amicus a publicly held corporation or other publicly held entity? ☐ YES ☑ NO

2. Does party/amicus have any parent corporations? ☐ YES ☑ NO
If yes, identify all parent corporations, including all generations of parent corporations:

3. Is 10% or more of the stock of a party/amicus owned by a publicly held corporation or other publicly held entity? ☐ YES ☑ NO
If yes, identify all such owners:

4. Is there any other publicly held corporation or other publicly held entity that has a direct financial interest in the outcome of the litigation? ☐YES ☑NO
If yes, identify entity and nature of interest:

5. Is party a trade association? (amici curiae do not complete this question) ☐YES ☑NO
If yes, identify any publicly held member whose stock or equity value could be affected substantially by the outcome of the proceeding or whose claims the trade association is pursuing in a representative capacity, or state that there is no such member:

6. Does this case arise out of a bankruptcy proceeding? ☐YES ☑NO
If yes, the debtor, the trustee, or the appellant (if neither the debtor nor the trustee is a party) must list (1) the members of any creditors' committee, (2) each debtor (if not in the caption), and (3) if a debtor is a corporation, the parent corporation and any publicly held corporation that owns 10% or more of the stock of the debtor.

7. Is this a criminal case in which there was an organizational victim? ☐YES ☑NO
If yes, the United States, absent good cause shown, must list (1) each organizational victim of the criminal activity and (2) if an organizational victim is a corporation, the parent corporation and any publicly held corporation that owns 10% or more of the stock of victim, to the extent that information can be obtained through due diligence.

Signature: /s/ Evan Dimond Johns Date: January 31, 2022

Counsel for: Sierra Club

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UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

DISCLOSURE STATEMENT

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No. 22-1000 Caption: Mountain Valley Pipeline LLC v. Va. State Air Pollution Control Board

Pursuant to FRAP 26.1 and Local Rule 26.1,

Appalachian Voices
(name of party/amicus)

who is an intervenor, makes the following disclosure:
(appellant/appellee/petitioner/respondent/amicus/intervenor)

1. Is party/amicus a publicly held corporation or other publicly held entity? ☐ YES ☑ NO

2. Does party/amicus have any parent corporations? ☐ YES ☑ NO
   If yes, identify all parent corporations, including all generations of parent corporations:

3. Is 10% or more of the stock of a party/amicus owned by a publicly held corporation or other publicly held entity? ☐ YES ☑ NO
   If yes, identify all such owners:

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Signature: /s/ Evan Dimond Johns Date: January 31, 2022

Counsel for: Appalachian Voices

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