



Robert Cooper
Vice President Engineering

July 31, 2014

Mr. Byron Coy
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

CPF No. 1-2014-1007

Dear Mr. Coy:

Pursuant to Section 190.237 of PHMSA's regulations, EQT respectfully provides this submittal responding to the "Notice of Probable Violation" issued in the above referenced matter on July 1, 2014 and received by EQT on July 2, 2014.

Item 1. §192.605 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

EQT's procedural manual for operations and maintenance (O&M) did not have a written process for the Pratt Compressor Station that addressed routing gas through the coolers before exiting the station.

On November 14, 2012, EQT submitted a SRC Report to PHMSA. EQT reported that a safety related condition existed at its Pratt Compressor Station on November 7, 2012.

In the SRC Report, EQT stated that on November 7, 2012 it discovered pipeline # GSF-360 had elongated and shifted off pipeline supports. The pipeline had expanded longitudinally approximately seven (7) inches. EQT categorized the SRC as a "condition that could lead to an imminent hazard and cause a 20% or more reduction in operating pressure or shutdown of operation..." EQT also stated in the report that it took corrective action by shutting down and blowing down (removing gas from) the pipeline. EQT reduced the pressure in #GSF-360 from 538 psig to 0 psig.

Subsequently, on November 16, 2012, an EQT representative provided an update and a photograph showing that pipeline #GSF-360 had shifted off pipeline supports.



During the period between December 26, 2012 and February 11, 2013, a PHMSA inspector exchanged emails with EQT representatives relating to the occurrence of the SRC. EQT determined the root cause of the line expansion and movement. The discharge temperature on #GSF-360 had reached approximately 180°F due to EQT personnel inadvertently bypassing the station coolers which caused the longitudinal expansion of the pipeline. EQT corrected the situation and placed the affected section of the pipeline back in service on December 21, 2012.

The PHMSA inspector requested a copy of the O&M procedure for the operation of pipeline #GSF-360 at Pratt Compressor Station, including related equipment (e.g. the cooler) in effect at the time of the SRC. The EQT representative stated that the O&M procedure existing at the time of the SRC did not specifically require routing of gas through the coolers. The EQT representative also stated that EQT established a separate procedure for cooler operations at the Pratt Compressor Station following the SRC.

The PHMSA inspector requested a copy of the original and supplemental procedure. The EQT representative provided the original start-up and shut-down procedure titled Start-up Shutdown Engine/Compressor Units 1, 2, 3, 4 & 5 Pratt #47 and the new additional procedure titled Pratt Station Required Procedures for Operations.

The PHMSA inspector reviewed the procedure, Start-up Shutdown Engine/Compressor Units 1, 2, 3, 4, & 5 Pratt #47, and noted that the procedure did not have a process for routing gas through the coolers before exiting the station. The PHMSA inspector also reviewed the new additional procedure, Pratt Station Required Procedures For Operations, which does state that “the unit discharge must always be routed through the gas cooler before exiting the yard or entering the second unit when 2 staging is required.”

The EQT representative indicated that the Pratt Compressor Station is the only facility that was designed to allow the gas to bypass the coolers. However, EQT’s O&M manual did not include a written process to require routing gas through the coolers before exiting the compressor station until after the SRC had occurred.

Response to Item 1:

EQT is sending payment of the civil penalty as per the instructions attached to CPF No. 1-2014-1007. In addition, EQT intends to comply with the proposed compliance order. Following the events set forth above, EQT established a procedure at Pratt Station that provides guidance to ensure proper station operation. The procedure includes the following language:

- The unit discharge must always be routed through a gas cooler before exiting the yard or entering the second unit when 2 staging is required

EQT will submit the material required by the Proposed Compliance Order to PHMSA within 60 days after receipt of the Final Order.

Sincerely,

Robert J. Cooper
Vice President of Engineering