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Of Transportation  
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**Pipeline and  
Hazardous Materials  
Safety Administration**

820 Bear Tavern Road,  
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**609.989.2171**

## WARNING LETTER

### EXPRESS OVERNIGHT DELIVERY

August 20, 2013

Robert Cooper, VP of Engineering  
EQT Midstream  
625 Liberty Avenue,  
Pittsburgh, PA 15222

**CPF 1-2013-1016W**

Dear Mr. Cooper:

On July 13-14, 2011, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), and interstate agents from the Public Service Commission of West Virginia, pursuant to Chapter 601 of 49 United States Code inspected your Copley Compressor Station in Lewis County, West Virginia and your Pratt Compressor Station in Green County, Pennsylvania.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

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 Midstream failed to follow its manual of written procedures for ensuring safety during maintenance and normal operations. Specifically, EQT Midstream failed to follow its procedures for valve maintenance, *Operations and Maintenance Manual Section 7.29 Valve Maintenance – Transmission Lines* [§192.745] paragraph 7.29.3, by not remediating three (3) emergency valves (valves: 33, 1068 and 1002) at the Pratt Compressor Station prior to the next inspection date.

EQT Midstream's procedure, *Operations and Maintenance Manual Section 7.29 Valve Maintenance – Transmission Lines* [§192.745], requires each valve to be "inspected at intervals not exceeding 15 months, but at least once each calendar year." Also, EQT Midstream's procedure, *Operations and Maintenance Manual Section 7.29 Valve Maintenance – Transmission Lines* [§192.745], requires remediation of a valve that does not operate properly to "take place prior to the next inspection date."

A PHMSA representative reviewed the last three (3) years of valve inspection records. Those records revealed that there were three (3) emergency valves at Pratt Compressor Station that were difficult to turn for three (3) consecutive years/inspections. According to EQT Midstream's procedure, it should have remediated those valves by the next inspection date. However, EQT Midstream did not produce any work orders or other documentation to show that those valves were remediated in accordance with its procedure.

**2. §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. . .**

**(2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.**

EQT Midstream failed to follow its manual of written procedures for ensuring safety during maintenance and normal operations. Specifically, EQT Midstream failed to follow its corrosion procedure, *Operations and Maintenance Manual October 2009, 8.15 Atmospheric Corrosion Control - Monitoring* [§192.481] paragraph 8.15.1, which requires all aboveground pipelines or portions of pipeline that are exposed to the atmosphere to be inspected at least once every 3 calendar years, but with intervals not exceeding 39 months, as prescribed in §192.481(a). EQT did not inspect a drip at its Pratt Storage Field in Pennsylvania that was exposed to the atmosphere for evidence of atmospheric corrosion within the specified interval.

During the field review at Pratt Storage Field on July 14, 2011, a PHMSA inspector observed and took photographs of an aboveground piping associated with the storage well 2976 that had a drip with a valve. The PHMSA inspector asked the EQT Midstream field technician whether this drip was inspected. The EQT Midstream field technician stated that the drip was not monitored for atmospheric corrosion. The PHMSA inspector reviewed EQT Midstream atmospheric corrosion records. These records did not show any indication that the drip was inspected in accordance with its procedure.

**3. §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. . .

**(2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.**

EQT Midstream failed to follow its manual of written procedures for ensuring safety during maintenance and normal operations. Specifically, EQT Midstream failed to follow its corrosion procedure, *Operations and Maintenance Manual October 2009, 8.15 Atmospheric Corrosion Control - Monitoring [§192.481]* second paragraph 8.15.2, which requires to “pay special attention” to piping under thermal insulation during inspections, as prescribed in §192.481(b). EQT Midstream did not pay special attention to piping under thermal insulation during its atmospheric corrosion inspections at its Copley Compressor Station and Pratt Compressor Station.

During the field review at the Copley Compressor Station on July 13, 2011, WVPSC and PHMSA inspectors observed and took photographs of piping with thermal insulation wraps. The inspectors asked whether any portion of the thermal insulation was ever removed to inspect underneath it. EQT Midstream indicated that it did not remove the thermal insulation. EQT Midstream did not produce documentation that showed it paid special attention to pipe under thermal insulation during the atmospheric corrosion inspection.

During the field review at Pratt Compressor Station on July 14, 2011, a PHMSA inspector observed and took photographs of insulated piping connected to a knockout scrubber at the suction line. EQT Midstream’s atmospheric corrosion records from 2006 to 2011 provided no indication that the piping under thermal insulations was inspected. EQT Midstream did not produce documentation that showed it paid special attention to pipe under thermal insulation during the atmospheric corrosion inspection

At the Pratt Compressor Station, a PHMSA inspector observed and took photographs of thermal insulation that was associated with two dry bed dehydrators (A&B). An EQT field staff indicated that particular attention was not given to the piping under thermal insulation. According to EQT Midstream field staff, these pipes were inactive and no attention was given to them since the early 2000s. Although inactive, they are still connected to the pipeline system (not being disconnected or blind flanged).

EQT Midstream did not provide any justification for why it did not pay special attention to piping underneath thermal insulation as stated in its procedure.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in EQT Midstream being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2013-1016W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

Byron Coy, P.E.  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration