



Robert Cooper  
Vice President Engineering

November 25, 2013

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

CPF No. 1-2013-1020M

Dear Mr. Coy:

Pursuant to Section 190.237 of PHMSA's regulations, EQT respectfully provides this submittal responding to the "Notice of Amendment" issued in the above referenced matter on October 25, 2013 and received by EQT on October 28, 2013. The items identified in the Notice of Amendment have been addressed as follows:

Item 1. §192.616 Public awareness.

**(a) Except for an operator of a master meter or petroleum gas system covered under paragraph(j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, see § 192.7).**

EQT's written continuing public education program, *Public Awareness Program*, was inadequate because it failed to reference the edition of API RP 1162 as seen in § 192.7.

**Response to Item 1:**

The first edition of API RP 1162 as seen in § 192.7 was used to develop the EQT Public Awareness Program. To ensure clarity going forward, Section 2.1 (enclosed) of the EQT Public Awareness Program has been revised to reference the latest edition approved by 49CFR Part 192.

Item 2. §192.616 Public awareness.

**(a)...**

**(b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.**

EQT's written continuing public education program, *Public Awareness Program*, was inadequate because it failed to follow the guidance in API RP 1162 Section 4. Specifically, EQT did not have a detailed written process for providing programs in both English and in other languages commonly used by significant concentration of non-English speaking population along the pipeline.

API RP 1162 Section 4 Message Content states, "an operator should select the optimum combination of messages, delivery methods, and frequency that meets the needs of the intended audience...communications materials should be provided in the language(s) spoken by a significant portion of the intended audience."

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During the inspection, EQT representative provided records demonstrating that EQT reviewed 2010 census data for the non-English population along their pipeline. However, the Public Awareness Program did not have information on what data was reviewed and evaluated. Consequently, there was no information about the frequency of evaluation and defining “significant number and concentration.”

**Response to Item 2:**

While §192.616 Public awareness provides that the program is to be conducted in both English and in other languages commonly used by significant concentration of non-English speaking population along the pipeline, there is no specific guidelines in API 1162 Section 4 Message Content or §192.616 Public awareness regarding that detailed written process to provide programs. To clarify the data that is reviewed and evaluated periodically and to provide information about the frequency of evaluation and the definition of significant non-English speaking population, EQT has added language to the Public Awareness Program, Section 6.2 (enclosed).

Item 3. §192.616 Public awareness.

(a) ...

**(b) The operator’s program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator’s pipeline and facilities.**

EQT’s written continuing public education program, *Public Awareness Program*, was inadequate because it failed to follow the general program recommendations of API RP 1162 Section 7.1 and assess the unique attributes and characteristics of its pipeline and facilities. Specifically, the *Public Awareness Program* failed to follow Section 7.1 (g), which states that the written program should include the program evaluation process, including the methodology to be used to perform the evaluation and analysis of the results and criteria for program improvement based on the results of the evaluation.

The Public Awareness Program did not have a detailed written process on how to determine whether the program had been developed and implemented according to API RP 1162. In addition, the Public Awareness Program did not have a detailed written process about how to determine whether the actions undertaken in implementation of API RP 1162 are achieving the intended goals and objectives. Overall, the Public Awareness Program lacked procedures for the evaluations outlined in Section 8 of API RP 1162. The Public Awareness Program had no information on what metrics/criteria/rational is used to determine if a modification to the baseline program and/or supplemental program enhancements are necessary.

**Response to Item 3:**

The EQT Public Awareness Program Section 13.0 Program Evaluation (enclosed) addresses the requirements of API RP 1162 Section 7.1(g) and has been included in the written program since the program was put in place. The program objectives, methodology used to perform evaluations, analysis of the results and criteria for improvement are described within Section 13.0.

EQT performs an annual review of the public awareness program utilizing modified Table E-1 Sample Audit of Program Implementation from Appendix E of API RP1162 to determine whether the program



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has been developed and implemented according to API RP 1162.

Procedures for the evaluations outlined in Section 8 of API RP 1162 are included in Section 13.0 and include phone surveys, postal surveys and face to face meeting attendance. The surveys and attendance figures are used to measure outreach, understandability of content and desired behaviors as recommended in API RP 1162 Section 8.4 Measuring Program Effectiveness.

Section 13.4 of the EQT Public Awareness Program Criteria for Program Improvement has been revised to clarify the process for determining when a modification to the baseline or supplemental program may be necessary.

Item 4. §192.616 Public awareness.

(a)...

**(b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.**

EQT's written continuing public education program, Public Awareness Program, was inadequate because it failed to follow the general program recommendations of API RP 1162 Section 4.5 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

API RP 1162 Section 4.5 Damage Prevention states, "Because even relatively minor excavation activities can cause damage to a pipeline or its protective coating or to other buried utility lines, it is important that operators raise the awareness of the need to report any suspected signs of damage...." The brochures that EQT sent to stakeholders did not contain the information that is recommended in Section 4.5 of API RP 1162.

**Response to item 4:**

The EQT brochures sent to stakeholders prior to the September 2012 Public Awareness inspection did address damage prevention. The use of an excavation One-Call Notification was explained as well as precautions to prevent pipeline damage. EQT included additional language in the December 2012 brochure "What You Should Know About Natural Gas Pipeline Safety" (enclosed) to more clearly define signs of damage. This additional language will be retained in future versions of the brochure.

Based on the above actions and the attached material, EQT believes that the concerns raised in the Notice of Amendment have been satisfied and the matter should be closed. Please do not hesitate to contact Gary Cowden (412-395-3251) if you have any questions.

Sincerely,

Robert J. Cooper  
Vice President of Engineering



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Vice President Engineering

Enclosures

Section 2.1 of EQT Public Awareness Program

Section 6.2 of EQT Public Awareness Program

Section 13.0 of EQT Public Awareness Program

EQT brochure "What You Should Know About Natural Gas Pipeline Safety"