



RECEIVED SEP 23 2015

CN

Mr. Byron Coy, PE
Director, Eastern Region
820 Bear Tavern Rd. Suite 103
West Trenton, NJ 08628

September 22, 2015

CPF No. 1-2015-1018

Dear Mr. Coy:

Pursuant to Section 190.213 of PHMSA's regulations, EQT respectfully provides this submittal responding to the "Notice of Probable Violation" issued in the above matter on July 17, 2014 and received by EQT on August 7, 2015.

Item 1. §192.163 Compressor stations: Design and Construction.

(d) Fenced areas. Each fence around a compressor station must have at least two gates located so as to provide a convenient opportunity for escape to a place of safety, or have other facilities affording a similarly convenient exit from the area. Each gate located within 200 feet (61 *meters*) of any compressor plant building must open outward and, when occupied, must be openable from the inside without a key.

EQT failed to provide at least two gates located so as to provide a convenient opportunity for escape to a place of safety

During a field visit to Wall Compressor station, inspection unit 83203, the PHMSA inspector observed the following:

1. The compressor station had
 - a. One escape gate on the west side
 - b. One escape gate on the south side
 - c. One locked vehicle gate on the west side
 - d. One locked vehicle gate on the east side
2. The north side of the compressor station had no gates.

The south side escape gate opened out onto a narrow landing, approximately four feet wide. The pathway outside of the gate was heavily overgrown on all sides and was bordered by a steep decline into a creek. Thus, it did not provide a convenient opportunity for escape to a place of safety as required by §192.163(d).

The PHMSA inspector discussed the south side escape gate with the Wall Compressor Station site manager and EQT compliance personnel prior to leaving the site. The site manager requested that PHMSA bring this matter up to the Operator at the end of the inspection in order to help provide justification for them to request funds to install an additional gate. The Wall Compressor Station escape gate was briefly discussed during the final exit interview attended by the PHMSA inspector and EQT compliance personnel.



Response to Item 1:

- a. EQT had some minor construction work being completed at the station in September 2015. The fence for the east side of the station was removed. When the fence was rebuilt a new escape gate was added, attachment 1. Attachment 2 shows the gate on the west side of the compressor station. Both will provide a convenient opportunity for escape to a place of safety as required by §192.163(d).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gregg West', written over a light blue horizontal line.

Gregg West
Vice President Midstream Operations



