



September 27, 2017

Robert Burrough  
Acting Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
820 Bear Tavern Rd Suite 103  
West Trenton, NJ 08628

Dear Mr. Burrough:

Contained herein is Utica East Ohio Midstream LLC's (UEO) response summary and supporting documentation addressing the Notice of Amendment (NOA), Letter of Concern, and Warning Letter received from PHMSA in regards to the 2015 Operation , Maintenance & Emergency and Gas and Liquid Integrity Management plans and procedures inspection. Per the NOA letter dated June 8, 2017 and specifically the section entitled "Response to this Notice", UEO has chosen to not contest the allegations and is providing the amended procedures as referenced below within 120 days of receipt of the notice.

**Notice of Amendment**

**CPF 1 2017-6002M**

**Inspection of OM&E and IMP Plans and Procedures**

- UEO has updated the OM&E Manual policies and procedures to correct all alleged inadequacies found by PHMSA during the inspection as well as review and update policies and procedures to reflect regulatory changes that have occurred within the Pipeline and Hazardous Materials Administration.
- UEO has updated the IMP Manual policies and procedures to correct all alleged inadequacies found by PHMSA during inspection as well as review and update policies and procedures to reflect regulatory changes that have occurred within the Pipeline and Hazardous Materials Administration.
- Contained within the response packet is a spreadsheet that summarizes the revisions made that correspond with the action item from PHMSA.
- Contained within the response packet you will find attached a copy of the OM&E Manual 2017 revision and a copy of the IMP 2107 revision.

**Letter of Concern**

**CPF 1-2017-6004C**

**Inspection of OM&E Manual policies and procedures**

- In regards to the arrangement of procedures in the manual not being concise and clear and the procedure not having enough detail to ensure regulatory compliance, Utica East Ohio Midstream LLC has revised the entire OM&E Manual to include more detail to procedures and policies as well as arranged policies so that the manual is more user friendly.
- In regards to the high pipe-to-soil readings found at the test stations located on HWY 524 UEO is actively working on remediation of the issue. A Close interval survey was conducted in May 2016 and results have shown interference does exist in the area. A Columbia Gas ground bed has been discovered and UEO and Williams Co. are working with Columbia Gas to move the ground bed.

600 Travis, Suite 5600  
Houston, TX 77002  
Telephone: (713) 783-3000 ♦ Facsimile: (713) 243-3095



**Letter of Warning**

**CPF 1-2017-6003W**

**Inspection of OM&E Manual and Control Room Management policies and procedures**

- 195.420(c) Protection from unauthorized operation and vandalism: As stated in the warning letter Utica East Ohio Midstream LLC has installed fencing around all of the valve sites with barbed wire, locked gates and signage.
- 195.446 Control Room Management: Utica East Ohio Midstream LLC has fully implemented the requirements of Control Room Management procedures and policies and has budgeted to perform a Third Party Audit on the Control Room Management Program to ensure regulatory compliance.

We are hopeful that the aforementioned actions along with the supporting documentation, plans, and procedures have adequately addressed PHMSA's concerns related to our UEO liquid pipeline operations.

Please let us know if you have additional questions or require additional information.

Sincerely

A handwritten signature in blue ink, appearing to read "J.C. Roberts", is written over the word "Sincerely".

James C. Roberts

Vice President, Environmental, Health, and Safety

Utica East Ohio Midstream LLC

(713) 243-3039 (office)

(970) 769-1955 (cell)

[j.roberts@momentummidstream.com](mailto:j.roberts@momentummidstream.com)

600 Travis, Suite 5600

Houston, TX 77002

Telephone: (713) 783-3000 ♦ Facsimile: (713) 243-3095