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EQT

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Vice President Midstream
Compliance and Operations
Analysis, Pipeline Operations

September 17, 2018

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

CPF No. 1-2018-1019M

Dear Mr. Burrough:

Pursuant to Section 192.12 of PHMSA's regulations, EQT respectfully provides this submittal responding to the "Notice of Amendment" issued in the above referenced matter on April 16-20, 2018 and received by EQT on August 22, 2018.

Item 1. §192.12 Underground natural gas storage facilities.

> **(e) Operators of underground natural gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to §192.12.**

EQT's written procedures for operations, maintenance and emergencies implementing the requirements of API RP 1170 and API RP 1171 were inadequate. Specifically, EQT did not establish a written Blowout Contingency Plan (BCP), as directed by API RP 1171, Section 10.6.3, covering the wells in the Gamble-Hayden storage facility.

The BCP was phased out of the Emergency Response Plan (ERP) even though it was still referenced in the ERP. The BCP is not included in the Emergency Table-Top Exercise program.

Response to Item 1:

EQT utilizes their Storage Well Emergency Response Plan (SWERP) as the Blowout Contingency Plan (BCP). EQT's principal written procedure for emergencies, the Emergency Response Plan (ERP), refers to the SWERP for storage well emergencies. Response to emergency situations is included in the Team Training Table-Top Exercise program. The Table-Top Exercises will be updated to include an example of a storage emergency. Additionally, the EQT Emergency Plan computer based training module is being updated and will address storage well emergency response.

Item 2. §192.12 Underground natural gas storage facilities.

> **(e) Operators of underground natural gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written**

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procedures for operations, maintenance, and emergencies established pursuant to §192.12.

EQT's written procedures for operations, maintenance, and emergencies implementing the requirement of API RP 1170 and API RP 1171 were inadequate. Specifically, EQT's written procedures did not provide details on how to determine operator familiarity with UNGS emergency plans, procedures, and periodic testing of the effectiveness of the plan, as directed by API RP 1171, Section 11.4.2.

Response to Item 2:

The Emergency Response Plan (ERP) is included in the New Hire Checklist – the list of required training programs for new operations employees. The ERP refers to the Storage Well Emergency Response Plan (SWERP) for UNGS emergency plans and procedures. Additionally, the Team Training Table-Top Exercise program and Emergency Plan computer based training are going to be updated to include storage well emergency situations to test the effectiveness of the SWERP.

Item 3. §192.12 Underground natural gas storage facilities.

(e) Operators of underground natural gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to §192.12.

EQT's written procedures for operations, maintenance and emergencies implementing the requirements of API RP 1170 and API RP 1171 were inadequate. Specifically, EQT's written procedures did not incorporate safety and environmental programs, as directed by API RP 1171, Section 11.9.1.

EQT's environmental engineer evaluated new construction, but EQT was unable to show where Health, Safety, and Environment (HSE) programs were included in UNGS procedures.

Response to Item 3:

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EQT's work management system issues work orders based on job plans that are accompanied with EQT's Standard Operating Procedures (SOPs). All SOPs have Health, Safety, and Environment (HSE) sections included with the job plans pertaining to storage well integrity. EQT will add verbiage to EQT's Storage Integrity Plan to show that HSE information is located within the SOPs.

Sincerely,

Gregg West
Vice President of Midstream Compliance and Operations Analysis

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