

February 17, 2021

Via Electronic Mail

Mr. Robert Burrough
Director, PHMSA Eastern Region
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: CPF 1-2020-019-WL

Dear Mr. Burrough,

This letter is in response to the November 24, 2020 Warning Letter (Letter) provided to Equitrans Midstream Corporation (Equitrans) by the Pipeline and Hazardous Materials Safety Administration (PHMSA).

As noted in the Letter, during the inspections from July 27-31, 2020, the PHMSA inspector requested records for capacity calculations of certain relief valves at compressor stations. The PHMSA inspector reviewed the Required Capacity and the Calculated Capacity documented within the Equitrans Resources Annual Relief Valve/Auto Shut-off Device Inspection and Capacity Verification Reports for 3 relief valves located at Comet Compressor Station, Hartson Compressor Station and Jefferson Compressor Stations. The PHMSA inspector requested the supporting data for the calculations of the required capacity of the source of overpressure and calculated capacity of the relief valve. Calculated capacity of the relief valve referenced the orifice area; however, the calculations were for the relieving device only and did not include considerations of inlet and outlet pressure losses which can limit relieving capacity. Therefore, Equitrans failed to determine the adequacy of the capacity of three (3) relief devices located at compressor stations and failing to consider inlet and outlet piping pressure losses in its calculations performed pursuant to §192.743.

Documentation for the relief valve calculations were provided during the inspection, Equitrans Midstream proactively made enhancements to the relief valve review process and will re-evaluate capacity calculations to ensure that the inlet and outlet piping losses are properly documented. Please note, the relief valves in question have been re-confirmed to have adequate relief capacity and do not pose a safety risk. As Equitrans' committed to earlier, an audit of all relief valve calculations is ongoing. Equitrans' number one priority is the safety of the general public, our employees and our pipeline systems. If you have questions or need additional information, please contact me at (412) 395-2971 or at GWest@equitransmidstream.com. Thank you for your time.

Sincerely,



Gregg West, Vice President
Environment, Safety and Compliance