EQT

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

August 8, 2012

Mr. Byron E. Coy, P.E.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Mountain View Office Park
820 Bear Tavern Road, Suite 306
West Trenton, NJ 08628

RE: Notice of Amendment, CPF No. 1-2012-1018M

Dear Mr. Coy:

Pursuant to Section 190.237 of PHMSA's regulations, EQT writes to respond to the Notice of Amendment (NOA) issued on July 13, 2012, in the above-referenced case, and to provide information about the Company's efforts to address the issue identified in the NOA. The NOA arose from a November 2011 PHMSA construction inspection of EQT's Sunrise Project pipeline expansion. During the inspection, PHMSA inspectors informed EQT personnel of their desire for EQT to add a reference to API 1104 to Sub-Section 4.1 "Requirements and Responsibilities of a Trained Welding Inspector" of EQT Midstream's Design & Construction Manual, Welding and Joining, Section 3.1 Welding and Inspection Standards. Section 192.241(c) of the Regulations incorporates by reference Section 9 of API 1104, which concerns the acceptability of visually inspected welds. While the references to API 1104 were contained in other sections of the welding procedure, EQT staff promptly agreed to make this clarifying change to Sub-Section 4.1. It also immediately reminded all its welders of the requirement to comply with API 1104 for visual inspection.

EQT is committed to the safety of its pipeline facilities. EQT recognizes, however, that there are always opportunities for improvement in its safety programs and procedures. Accordingly, EQT appreciates the useful input provided by PHMSA inspectors during the inspection. EQT has clarified its welding procedure to include a reference to API 1104 and has attached the relevant portion of its revised welding procedure . The company believes that this revised procedure satisfies the concern raised in the NOA and that the matter should be closed. In accordance with PHMSA's request for information regarding the cost to EQT associated with the NOA, EQT reports that the costs were minimal.

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Please do not hesitate to contact Gary Cowden (412-395-3251) if you have any questions.

Respectfully submitted,

Robert J. Cooper
VP Engineering

CC: Alex Dankanich, P.E., CATS Coordinator and General Engineer
Wayne Chan, P.E., General Engineer

Attachment: Revised EQT Midstream welding procedure

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- The in-service welder should demonstrate the ability to control the welding heat input within the limits defined by the qualified in-service welding procedure, if applicable.
- The in-service welder should demonstrate the ability to deposit the welding beads within the tolerances specified by the qualified in-service welding procedure, if applicable.
- An in-service weld requires one welder, for all pipe sizes

- The Company Weld Inspector shall be responsible for inspecting any and all in-service welds performed in accordance with Company qualified in-service welding procedures as well as the safety precautions associated with cutting and welding on piping that contains or has contained a gas or a liquid such as natural gas or crude oil.
- The pipe wall thickness at the weld location should be verified prior to any in-service welding being performed.
- Preheating should be used, when applicable, to remove any moisture that is present in the weld area.
- The joint gap between the run pipe and the attachment (e.g., sleeve or branch connection) should not be excessive.
  - Clamps should be used to obtain a proper fit-up.
  - Weld metal buttering could be used to reduce the joint gap.
- When welding a full encirclement sleeve, a backing bar should be used for welding of the long seams. The backing bar should be defined in the qualified in-service welding procedure.
- When welding a full encirclement sleeve, both long seams should be completed first. If required, one of the circumferential ends should be completed prior to starting the second circumferential weld (Figure 5).
- When making a branch weld prior to a hot-tap operation, one of the suggested branch designs described in Figure 5 should be used.
- Completed in-service fillet welds should comply with the requirements of Figure 4.
- The requirements for inspection of in-service welds should be performed in accordance with Section 4.4.

4 Post Construction Inspection

- The Welding Inspector or Weld Coordinator shall have final authority of what constitutes an acceptable weld and the disposition of defective welds.
- The Company reserves the right to nondestructively test any and all welds, and/or to cutout welds from the pipeline at any time for the testing of each welders work.
- Non-destructive testing of welds is typically made by a third party Radiographic Contractor whose qualifications must meet the standards specified within the latest DOT approved edition of API 1104. A contract radiographer from an inspection company is required to have the Radiographic Unit Qualification, a Level II or III Radiographer Qualification as per ASNT Recommended Practice SNT-TC-1A, and the written guidelines and procedures on hand for interpretation, development, and processing of film.
- Contracted NDT agencies shall perform work as required and stipulated by authorized company personnel.
- The pipeline crew must plan their work in order to allow the NDT Technician ample time to complete the inspections during a normal workday.

4.1 Requirements and responsibilities of a trained Weld Inspector:

- All visual inspection of welds shall be conducted as per the requirements of API 1104