Robert J. Cooper
Vice President Engineering

RECEIVED SEP 18 2013

September 16, 2013

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

CPF No. 1-2013-1017M

Dear Mr. Coy:

Pursuant to Section 190.237 of PHMSA's regulations, EQT respectfully provides this submittal to the "Notice of Amendment" issued on August 20, 2013 in the above referenced matter. The items identified in the Notice of Amendment have been addressed as follows:

Item 1. §192.225 Welding Procedures.

> **(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (incorporated by reference, see §19.7) or section IX of the ASME Boiler and Pressure Vessel Code "Welding and Brazing Qualifications" (incorporated by reference, see §192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures shall be determined by destructive testing in accordance with the applicable welding standard(s).**

EQT's welding procedures, Design & Construction Manual – Welding & Joining, was inadequate because it did not mention the API 1104 version incorporated by reference in 49 C.F.R. 192 for the welder and the welding procedures.

Response to Item 1:

EQT welders and welding procedures have been documented to be in accordance with API 1104 latest version incorporated by reference in 49 C.F.R. 192. API 1104 is referenced throughout the EQT Weld Standards, including 3.1 Welding and Inspection Requirements; 3.2 Welder Qualification Requirements; and 3.3 Weld Procedure and Qualification Requirements. In order to clarify that EQT welders and welding procedures are qualified per API 1104, the following statement has been added to Standards 3.1, 3.2 and 3.3 in section 1Compliance with Codes and Standards (a copy of which is attached):

Welding on DOT jurisdictional facilities will be performed by a qualified welder in accordance with welding procedures qualified under section 5 of API 1104 (latest version incorporated by reference in 49 C.F.R. 192) or section IX of the ASME Boiler and Pressure Vessel Code "Welding and Brazing Qualifications" (latest version incorporated by reference in 49 C.F.R. 192) to produce welds meeting the requirements of this standard.

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Item 2. §192.605 Procedural manual for operations, maintenance, and emergencies.

> **(a)...**
> **(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
> **(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.**

EQT's procedures for inspecting and testing relief devices in compressor station in its manual, specifically Operations and Maintenance Manual, Section 7.23 Compressor Stations: Inspection and Testing of Pressure Relief Devices [§192.731], was inadequate because the guidelines in the supplemental procedure did not ensure that the gauge was calibrated to accurately determine and adjust the shutdown switch trips at the proper set point. Particularly, EQT's supplemental procedure, MP085 Maintain, Test and Repair Overpressure Protection Devices under Engine/Compressor High Discharge Pressure Shutdown Test General Procedure, lacks specific details on the use of a calibrated gauge to test the shutdown test point.

Response to Item 2:

EQT personnel are trained to verify that calibrated equipment is used prior to performing tests on pipeline facilities. EQT has revised MP085 Maintain, Test and Repair Overpressure Protection Devices section Engine/Compressor High Discharge Pressure Shutdown Test General Procedure step 2 to clearly state this requirement; a copy of the revised provision is attached. As revised, the procedural step reads:

2. Verify the gauge used to test the shutdown test point has been calibrated

In addition the Material and Equipment requirements section of MP085 has been revised from "Gauges" to "Calibrated Gauges"

Item 3. §192.605 Procedural manual for operations, maintenance, and emergencies.

> **(a) ...**
> **(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations...**
> **(2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.**

EQT's procedure for corrosion control in its manual of written procedures, specifically Operations and Maintenance Manual October 2009, Section 8.15 Atmospheric corrosion Control – Monitoring [§192.481], and related procedure, Inspect for Atmospheric Corrosion, Revision No. 0, Revision Date October 30, 2009, was inadequate because it lacked detailed instructions to monitor atmospheric corrosion.

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The aforementioned procedures were general and provided no guidance on how to give particular attention to pipe at soil-to –air interfaces, under thermal insulation, under disbanded coatings, at pipe supports in splash zones and in spans over water in accordance with section 192.481(b). EQT's corrosion control procedure does not specify how it determines where to give particular attention to piping under thermal insulation such as by sampling inspection checkpoints prone to corrosion.

Furthermore, EQT's corrosion control procedure refers to above-ground pipeline and does not consider portions of belowground pipeline that are exposed to the atmosphere.

EQT only requires a visual "[examination of] exposed portions of pipelines and soil-to-air interfaces located at aboveground block valves, pig traps and station piping." During the field inspection at Copley Compressor Station and Pratt Compressor Station, PHMSA inspectors observed pipe under thermal insulation and pipe supports.

Also, EQT's procedure for corrosion control only requires that "[r]egular inspections should be made to ensure above-ground pipeline facilities are protected against atmospheric corrosion." (emphasis added). During the field inspection, PHMSA inspectors observed portions of below-ground pipeline that were exposed to the atmosphere.

Response to Item 3:

The EQT Operations and Maintenance Manual section 8.15 Atmospheric Corrosion Control – Monitoring [§192.481] existing at the time of the Integrated Inspection did specify under section 8.15.2 "During inspections, special attention will be given to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, and in spans over water." Additional instruction to monitor for atmospheric corrosion at these locations has been added to the Standard Operating Procedure MP12 Inspect for Atmospheric Corrosion (attached) which is referenced in the O&M Manual. In addition language has been added to MP12 to clarify atmospheric corrosion inspections are to be completed on aboveground and below-ground exposed pipeline facilities.

Item 4. §192.605 Procedural manual for operations, maintenance, and emergencies.

> **(a)…**
> **(c) Abnormal Operation. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:**
> **(4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.**

EQT's procedure for abnormal operation in its manual, specifically Operations and Maintenance (O&M) Manual October 2009, Section 4.4 Reviewing the Effectiveness of Abnormal Operating Procedures [§192.605(c)(4)], is inadequate because it does not specify the job title(s) of the individual(s) who are responsible for reviewing and correcting the abnormal operating procedures.

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Response to item 4:

The EQT Operations and Maintenance (O&M) Manual in place at the time of the Integrated Inspection did require that a review of the effectiveness of abnormal operating procedures take place but was not specific to the personnel involved in the review. EQT's Operations and Maintenance (O&M) Manual Section 4.4 has been revised to include, for clarity, the job titles and personnel that carry out the requirements of §192.605(c)(4). As revised, the amended manual section is written as follows:

4.4 Reviewing the Effectiveness of Abnormal Operating Procedures [§192.605(c)(4)]

EQT Midstream will periodically review the work performed by operator personnel to determine the effectiveness of the procedures used in Abnormal Operations, and will take corrective action where any deficiencies are found and deemed necessary. The review will be completed following the occurrence of an abnormal operation with the intent of determining the cause of the abnormal operation and taking corrective actions. The Manager of Compliance or Compliance Engineer and the operations person(s) knowledgeable of the abnormal operation will conduct the review and complete an Abnormal Operations Report form (Appendix D). When procedural deficiencies are determined to be a contributing factor the procedure will be modified.

Based on the above actions and the attached material, EQT believes that the concerns raised in the Notice of Amendment have been satisfied and the matter should be closed. Please do not hesitate to contact Gary Cowden (412-395-3251) if you have any questions.

Sincerely,

Robert J. Cooper
Vice President of Engineering

Enclosures
Section 1 of EQT Design and Construction Manual Standards 3.1, 3.2 and 3.3
Standard Operating Procedure MP12 Inspect for Atmospheric Corrosion, applicable sections
Standard Operating Procedure MP085 Maintain, Test and Repair Overpressure Protection Devices, applicable sections
EQT Operations and Maintenance Manual Section 4.4 Reviewing the Effectiveness of Abnormal Operating Procedures

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