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August 26, 2015

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

CPF No. 1-2015-1016M

Dear Mr. Coy:

Pursuant to Section 190.206 of PHMSA's regulations, EQT respectfully provides this submittal responding to the "Notice of Amendment" issued in the above referenced matter on July 29, 2015.

Item 1. §192.605 Procedural manual for operations, maintenance, and emergencies.

> **(e) Surveillance, emergency response, and accident investigation. The procedures required by § 192.613(a), 192.615, and 192.617 must be included in the manual required by paragraph (a) of this section.**

EQT's written procedures were inadequate in that they failed to describe what training was to be provided on the emergency procedures, and how the effectiveness of that training was to be verified as prescribed in § 192.615(b)(2).

During the inspection, the PHMSA inspector reviewed EQT's Emergency Plan Procedure Revision 18 dated March 13, 2014. Section 6.0 (Training and Review) of the procedure states that training is being conducted, but it fails to mention how training takes place, and what methods are utilized to document the training. The procedure also fails to adequately describe how the effectiveness of the training is verified.

Response to Item 1:

The training program at EQT includes routine training of employees on emergency preparedness and response, conducting training exercises and tabletop drills. EQT will amend the Emergency Plan, section 6.0 Training and Review as shown on pages 3 and 4 to clarify the method of documentation and how the effectiveness of the training is verified.

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

> **(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.**

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EQT's corrosion control procedures were inadequate in that they failed to address how the amount of cathodic protection is controlled so as not to damage the protective coating or the pipe as it relates to § 192.463(c).

During the inspection, the PHMSA inspector reviewed corrosion pipe-to-soil readings for EQT jurisdictional pipelines in PA and WV from 2011 through 2014. The inspector noted that some instant off readings were more negative than -1.2 volts. The inspector asked the operator if it was aware of guidance material that suggested that these types of readings may lead to disbonded coating on the pipe. EQT's Corrosion Specialist for the West Virginia area stated that EQT was aware of this possibility, and that EQT investigates when it finds readings that are more negative than -1.2 volts.

Subsequently, the PHMSA inspector reviewed EQT's corrosion control procedures in the O&M Manual- Section 8 "Corrosion Control", dated October 2009. Specifically, Sections 8.1 through 8.6 were reviewed to verify whether the investigation of these low readings was described. The PHMSA inspector found no description in the procedures. The PHMSA inspector requested records of one of these investigations, but was told by EQT's Compliance Specialist that none were available because there has not been an investigation of a reading more negative than -1.2 volts to date. The PHMSA inspector requested any other procedures that cover this type of investigation. EQT stated that there were no procedures written that cover how to conduct this type of investigation.

Response to Item 2:

EQT will amend Section 8.5 External Corrosion Control - Cathodic Protection of the EQT Operating and Maintenance Plan by adding language to address recognition, investigation and remediation of higher than normal off potential readings as shown on pages 5 and 6.

Sincerely,

Gregg West,
Vice President Midstream Operations

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6.0 TRAINING AND REVIEW

6.1 Operating personnel that may be required to respond to an emergency as defined in 49CFR Part §192.615 will be provided training to assure that they are knowledgeable of the EQT emergency procedures.

6.2 The training will be provided by EQT Management (ex. Technical Training, Pipeline and Compression Supervision, Regulatory Compliance) and received by EQT first responders (ex. Pipeline Operators, Compressor Technicians)

6.3 The training will emphasize defining an emergency, accessing emergency procedures and initial field procedures.

6.4 The method of training may be through:

- 6.4.1 Classroom instruction,
- 6.4.2 Computer based training,
- 6.4.3 Tabletop drills,
- 6.4.4 Field drills, or
- 6.4.6 Procedure review

6.5 Each district will hold Emergency Plan training using one of the methods above each calendar year

6.6 The effectiveness of the training will be verified by either

- 6.6.1 Computer based training testing,
- 6.6.2 Emergency response related operator qualification testing, or
- 6.6.3 Review of employee activities to determine whether the procedures were effectively followed during a tabletop drill, field drill or following a pipeline emergency.

6.7 The training will be documented by recording the name and date of the person completing the training. The method of documentation will be via sign in sheets

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or electronically in a Learning Management System, Maximo or equivalent system.

6.8 The Compliance Department will be responsible for providing a copy of the latest edition of the Emergency Plan, as well as any future updates, to those supervisors responsible for emergency action through a computerized version of the Emergency Plan available on the Corporate Intranet.

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8.5 External Corrosion Control - Cathodic Protection [§192.463]

Cathodic Protection over voltage (higher than normal off potentials)

The amount of cathodic protection must be controlled so as not to damage the protective coating or the pipe.

As a guideline, polarized potentials should be maintained at a level to minimize the possibility of cathodic disbondment of the coating and hydrogen embrittlement of the steel.

There are several situations that affect the interpretation of potential measurement. These situations include:

- spiking of potential during interruption
- averaging of potentials circumferentially around or longitudinally along the pipeline
- long-line currents or multiple pipelines in the right-of-way (especially when different coating conditions exists)
- dynamic stray currents
- influence of foreign cathodic protection systems
- decoupling current devices
- soil polarization
- the presence of anode gradients

There needs to be a balance between the possibility of over driving a section of piping and the risk of under protecting other sections.

If the potential for over voltage has been identified, the results of the following data should be reviewed:

- previous bell hole examinations
- previous pipe-to-soil potential measurements
- previous surveys (CIS, DCVG, ACVG, etc.)

If insufficient information is available to determine if over-voltage is a problem, the following investigations may be performed:

- bell hole examinations in the area of high potentials
- pipe-to-soil potential measurements in the area of any excavations

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- surveys (CIS, DCVG, ACVG, etc.)
- sphere of influence testing

If it is determined that over-voltage is a problem, then the magnitude of the influencing current must be reduced

Revision: 3 - 8/19/15

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