

September 23, 2021

Via Electronic Mail

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

RE: CPF 1-2021-046-WL

Dear Mr. Burrough,

This letter is in response to the August 5, 2021 Warning Letter (Letter) provided to Equitrans Midstream Corporation (Equitrans) by the Pipeline and Hazardous Materials Safety Administration (PHMSA). The following information serves as Equitrans' response to the Letter:

PHMSA Inspection Item No. 1

Skin Creek Well 7757 was plugged and abandoned in 2019. Rhodes Well 8164 plugging activities began in late 2019 and completed in early 2020.

Equitrans filed a late report into the PHMSA database directly following the conclusion of the Audit for Rhodes well 8164 on 11/4/2020. Equitrans supplied the PHMSA Representative (Auditor) with the Plugging Affidavit for Skin Creek Well 7757 on 10/19/2020. Equitrans has developed a Storage Integrity Group to evaluate and report on all relative storage data. The group is comprised of multiple disciplines to assure that all aspects related to the information gathered will be considered and reported as required. The group conducts monthly storage meetings to review planned activities including, plugging and abandonment activities to ensure all future reporting requirements are met. The monthly storage meetings began in 2020.

PHMSA Inspection Item No. 2

As noted in the letter, during the inspections from October 6 – October 9, 2020, the PHMSA inspector reviewed records regarding safety related conditions. Based on integrity assessment data provided by Baker Hughes for Skin Creek Well 7757, Equitrans discovered a Class 4 corrosion condition on 10-18-2018, and determined that a safety related condition existed on the same date. Equitrans reported the safety related condition to PHMSA seven (7) working days after the discovery on 10/29/2018. Equitrans acknowledges that we did not file the report within the required timeframe of five (5) working days after determination that the condition existed.

As a direct result, Equitrans developed a Storage Integrity Group to evaluate and report on all relative storage data in the future. The group is comprised of multiple disciplines to assure that all aspects related to the information gathered will be considered and reported as required.

PHMSA Inspection Item No. 3

Equitrans updated the Standard Operating Procedure STR-03, Monthly Inspection of Storage Wells, and associated Job Plan to include monitoring and recording of pressure and/or flow on each identified annulus vent if gas is present. The job plan went into effect April 1, 2021. Equitrans continually records and monitors annuli pressures and/or flows as part of the monthly inspection. The Storage Integrity Group evaluates the data to assure the established thresholds are not exceeded.

PHMSA Inspection Item No. 4

In regard to site security safeguards, the Equitrans Integrity Management Program for Underground Gas Storage (SIMP), Section 5.2, addresses monthly well inspections. One of the inspection items to be noted and recorded was to verify well security. If there were any indications of vandalism, follow-up notification with the supervisor or manager was required. As a result of the PHMSA inspection, Equitrans updated its Standard Operating Procedure STR-03, Monthly Inspection of Storage Wells, and associated Job Plan to include a site security inspection. The Job Plan includes valve security and vandalism line items, for documenting each task. All Security related issues and/or vandalism requires a follow-up work order be created and notification sent to the supervisor. The job plan went into effect April 1, 2021.

PHMSA Inspection Item No. 5

As a result of the findings of the PHMSA inspection, Equitrans updated its procedures to include the effect date, approved date and next review date immediately following an audit. The standard operating procedures (SOPs) are in Equitrans standard process and are reviewed once a year not and to exceed 15 months. All Storage SOPs have been reviewed and updated in 2021 in accordance with Equitrans procedures.

PHMSA Inspection Item No. 6

Regarding monthly well inspections, Equitrans updated its Standard Operating Procedure STR-03, Monthly Inspection of Storage Wells, and associated Job Plan to include a well sign inspection. The inspection includes verifying that the sign is visible, and all the information is legible. The Job Plan includes a line item for the sign inspection to be recorded. Any issues with the integrity of the sign requires a follow-up work order be created and notification sent to the supervisor. The job plan went into effect on April 1, 2021.

PHMSA Inspection Item No. 7

Please note, that Equitrans updated Standard Operating Procedure STR-03, Monthly Inspection of Storage Wells, and the associated Job Plan to include monitoring and recording of pressure and/or flow on each identified annulus vent if gas is present. The job plan went into effect April 1, 2021. Equitrans records and monitors annulus pressures and/or flows as part of the monthly inspection. Equitrans established a flow threshold equivalent to the max flow rate of the measurement device used, approximately 300 CFD. The device used to measure annular flow rate is a Rotameter. The Storage Integrity Group evaluates the data to assure the established thresholds are not exceeded.



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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 GWest@equitransmidstream.com. Thank you for your time.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gregg West', written in a cursive style.

Gregg West, Vice President
Environment, Safety and Compliance