

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

November 18, 2021

Mr. Gregg West
Vice President, Midstream Operations
Equitrans Midstream Corporation
2200 Energy Drive
Canonsburg, Pennsylvania 15317

CPF 1-2021-063-NOA

Dear Mr. West:

From July 20, 2021 to July 21, 2021, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Equitrans Midstream Corporation's (EQT) design and construction procedures for the Mountain Valley Pipeline in Beckley, West Virginia.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within EQT's plans or procedures, as described below:

1. § 192.303 Compliance with specifications or standards.

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

EQT's standards for constructing transmission lines were inadequate to ensure safe operation of a pipeline facility. Specifically, EQT's MVP construction standards for coating inspection did not adequately address the requirements of § 192.307,¹ § 192.309,² and § 192.461(e),³ as required by § 192.303.

During the inspection, PHMSA requested EQT's procedures for assessing coating and remediating damage that may have occurred as a result of installation by boring, driving, horizontal directional drilling, or other similar methods. EQT provided Sections 10.2 and 10.4 of its *MVP Design and Construction Manual*. However, these procedures did not address inspecting and assessing pipe that emerges in the exit pit for indication of damage. Additionally, the procedures did not include requirements to remediate damage that may have occurred during installation.

Therefore, EQT failed to prepare written standards to be followed during transmission line or main construction that were consistent with the requirements of Part 192, as required by § 192.303. EQT must revise its procedures to specifically address the requirements of § 192.307, § 192.309, and § 192.416(e).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Enforcement Proceedings.

Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that EQT maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. In correspondence concerning this matter, please refer to **CPF 1-2021-063-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on USB flash drive accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings

¹ § 192.307 Inspection of materials.

Each length of pipe and each other component must be visually inspected at the site of installation to ensure that it has not sustained any visually determinable damage that could impair its serviceability.

² § 192.309 Repair of steel pipe.

- (a) Each imperfection or damage that impairs the serviceability of a length of steel pipe must be repaired or removed. ...

³ § 192.461 External corrosion control: Protective coating.

- (a) ...

- (e) If coated pipe is installed by boring, driving, or other similar method, precautions must be taken to minimize damage to the coating during installation.