

December 16, 2021

Via Electronic Mail

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

RE: CPF 1-2021-063-NOA

Dear Mr. Burrough,

This letter is in response to the November 18, 2021 Notice of Amendment 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.

Background

During the inspection, a PHMSA inspector requested procedures for assessing and remediating coating that may have been damaged as a result of installation by boring, driving, or other similar methods. Equitrans provided MVP Design and Construction Manual Section 10.2 Subsection 3. The inspector indicated that the MVP procedures did not adequately address inspecting and assessing pipe that emerge in the exit pit for indication and remediation of damage that may occur. Equitrans indicated willingness to amend their procedures to address this issue.

Response

Mountain Valley Pipeline (MVP) disagrees with PHMSA's position that the procedures inadequately addressed inspection and assessment of newly constructed pipe at the exit of the bore. §192.303 requires that pipelines "be constructed in accordance with comprehensive written specifications or standards that are consistent with this part." §192.307 requires that pipe is to be "visually inspected at the site of installation" and §192.461 requires that "precautions be taken to minimize damage to the coating during installation." MVP maintains a position that inspection protocols and policies are in compliance with the cited sections of code.

Please note, the amended language was crafted and agreed upon at the time of the PHMSA inspection. Company representatives attempted to explain to the inspector that the issue raised was covered in multiple locations throughout MVP's construction standards. However, MVP agreed to make the change to provide further clarification for future inspections.

Multiple references to pipe coating inspection exist throughout the MVP construction standards.



Standard 10.2 Pipeline Construction contains the following language in section 14.1.

- Final inspection of the coating by holiday detector shall be made immediately prior to the final placement of the pipe ...

Standard 10.2 Pipeline Construction contains the following language in section 17.7.

- Coating shall be inspected in accordance with NACE SP0188 - Discontinuity (Holiday) Testing of New Protective Coatings on Conductive Substrates.
- The coating shall be inspected (jeeping) with an electronic holiday detector (jeep) or other Company approved coating flaw detector ...
- All coating defects found by visual or electronic inspection will be repaired by the Contractor, using approved material and methods, to the satisfaction of the Company Representative.

Standard 10.4 Corrosion Construction contains the following language in section 3.6.

3.6.1 Visual Inspection

The Company Authorized Representative will document all inspection activities on the Daily Coating Form. The following information shall be collected for the first, last and every tenth weld/fitting coated each day. Additionally, this information shall be documented for every tie-in weld and any weld associated with a bored installation:

- Ambient conditions at the time of coating
- Surface preparation method and the resulting surface profile
- Product used, including the batch numbers and expiration dates
- Substrate temperature at the time of coating application
- Application method
- Dry film thickness measurements at the 12:00, 3:00, 6:00, and 9:00 positions shall be recorded for all welds.
- The Shore D hardness of the coating at the time the dry film thicknesses were recorded. The Shore D must be measured using a calibrated Durometer.

3.6.2 Holiday Detection

General Requirements: All coated pipe shall be completely tested with a calibrated Holiday detector at a minimum of three times:

- To locate Holidays.
- After the Holidays are repaired and girth weld areas coated.
- Immediately prior to lowering the pipe into the ditch.

3.6.3 Holiday Repair

- All coating defects found by visual or electronic inspection will be repaired by the Contractor, using approved material and methods, to the satisfaction of the Company



Authorized Representative. All holiday detection and holiday repairs must be conducted to the satisfaction of the Company Authorized Representative.

Based on the references listed above, MVP disagrees with the notice of amendment (NOA) and that MVP inadequately addresses inspecting and assessing pipe that emerge in the exit pit for indication and remediation of damage that may occur. The amended language, agreed upon by MVP representatives, was simply a complement to its own construction standards. MVP maintains that adequate language regarding pipe coating inspection already existed elsewhere in its construction standards.

MVP takes pride in the comprehensive standards it maintains and welcomes suggested modifications. Incorporating new language into any standard takes time and careful consideration that requires input from multiple levels within the organization. As it was previously discussed, references to pipe inspection exist in multiple locations throughout the MVP construction standards. New language has been added to the following locations.

Standard 10.2 Pipeline Construction

New sections 3.2 Road, Highway and Railroad Crossings, General and 4.2 Waterbody Crossings, General

- Bored crossings include, but are not limited to conventional bore, guided bore, direct pipe Microtunneling (MTB), and Horizontal Directional Drilling (HDD).
- Contractor to provide method(s) to allow verification that the bore path accuracy meets the requirements of the crossing drawings and specifications. Should the bore path depart from the designed path outside of acceptable tolerances, the Company Representative and Company Engineering shall be consulted to determine a corrective course of action.

New language added to section 17.1 Coating and Test Stations, General

- For bored crossings, Company may elect to perform Coating Conductance Testing to determine the remaining quality of the coating after pushing or pulling back the pipe into the bore hole.

New language added to section 17.5 Field Applied Coatings - Types

- Sacrificial coatings may be specified for bores in which the geology that the bore passes through could damage both the ARO and the cathodic protection coating.

New language added to section 17.7 Coating Inspection and 23.7 Pullback Operations

- The leading pipe for any pipe string that is pushed or pulled into bored hole shall be inspected for coating and pipe damage after it exits the bore. Should the pipe or corrosion control pipe coating be damaged, the pipe and corrosion control coating shall receive a more detailed inspection by the Company Representative. The Company Representative will work with Company Corrosion Engineer to evaluate the damage, and to specify the corrective action. Additional evaluations may include Coating Conductance Testing, which may indicate the need for additional cathodic protection for the pipe in the crossing.



Standard 10.4 Corrosion Construction

Section 3.6.1 Visual Inspection

- The leading pipe for any pipe string that is pushed or pulled into bored hole shall be inspected for coating and pipe damage after it exits the bore. Should the pipe or corrosion control pipe coating be damaged, the pipe and corrosion control coating shall receive a more detailed inspection by the Company Representative. The Company Representative will work with Company Corrosion Engineer to evaluate the damage, and to specify the corrective action. Additional evaluations may include Coating Conductance Testing, which may indicate the need for additional cathodic protection for the pipe in the crossing.

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,

Gregg West, Vice President
Environment, Safety and Compliance