



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

March 22, 2022

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

CPF 1-2022-013-NOA

Dear Mr. West:

From June 14, 2021 through June 18, 2021, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Equitrans Midstream Corporation's (ETRN) operations, maintenance, and emergency response procedures for the Pratt underground natural gas storage field located in Greene County, Pennsylvania.

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

1. § 192.12 Underground natural gas storage facilities.

(a) ...

(c) Each operator of a UNGSF must prepare and follow for each facility one or more manuals of written procedures for conducting operations, maintenance, and emergency preparedness and response activities under paragraphs (a) and (b) of this section. Each operator must keep records necessary to administer such procedures and review and update these manuals at intervals not exceeding 15 months, but at least once each calendar year. Each operator must keep the appropriate parts of these manuals accessible at locations where UNGSF work is being performed. Each operator must have written procedures in place before commencing operations or beginning an activity not yet implemented.

ETRN's written procedures for conducting operations, maintenance, and emergency preparedness and response activities were inadequate to ensure safe operation of a pipeline facility. Specifically, ETRN failed to include written procedures addressing the requirements of Section 11 of API RP 1171 (Section 11)¹.

Section 192.12(b)(2) requires operators of depleted hydrocarbon and aquifer reservoir underground natural gas storage facilities constructed on or before July 18, 2017 to meet the provisions of section 11 of API RP 1171, and § 192.12(c) requires procedures pursuant to this requirement. Section 11.2.1 of API RP 1171 states in relevant part that operators "...shall develop and follow procedures for the construction, operation, and maintenance of natural gas storage wells and reservoirs to establish and maintain functional integrity. When practicable, the operator's procedures should incorporate applicable industry recommended practices that promote personal and process safety, resource conservation, environmental stewardship, mechanical integrity, and reliable performance."

During the inspection, ETRN was unable to provide procedures related to the maintenance, repair, and remediation activities performed on the Pratt storage wells. Following the inspection, PHMSA requested documentation of procedures used during the plugging and abandonment (P&A) activities performed during 2020 and 2021 at the Pratt Storage Field. ETRN provided PHMSA job specific plans related to the P&A work performed. Procedures pertaining to the development, review, and approval process for the job specific plans were not available.

Therefore, ETRN's procedures for underground storage were inadequate. ETRN must prepare procedures addressing the development, review, and approval process for job plans associated with maintenance, repair, and remediation activities. These procedures/processes must be included in ETRN's procedure manual for underground storage.

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

¹ API 1171, Section 11 General: This section addresses requirements for the development, implementation, and maintenance of programs, plans, and procedures intended to safely and effectively guide the operator in design, construction, operation, and maintenance of underground natural gas storage facilities.

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 Equitrans Midstream Corporation 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 1-2022-013-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,

A handwritten signature in blue ink, appearing to read "Robert Burrough", is positioned above the typed name.

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

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings