

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

February 15, 2022

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

CPF 1-2022-020-WL

Dear Mr. West:

From August 9, 2021 to September 15, 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) Logansport, Mobley, and Hayes underground natural gas storage facilities in Wetzel and Marion Counties, West Virginia.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

1. §191.22 National Registry of Operators¹

(a) ...

(c) *Changes.* Each operator of a gas pipeline, gas pipeline facility, UNGSF, LNG plant, or LNG facility must notify PHMSA electronically

¹ In the Interim Final Rule effective January 18, 2017, which was superseded on March 13, 2020, this requirement was present but read:

(c) *Changes.* Each operator of a gas pipeline, gas pipeline facility, underground natural gas storage facility, LNG plant, or LNG facility must notify PHMSA electronically through the National Registry of Pipeline, Underground Natural Gas Storage Facility, and LNG Operators at <http://opsweb.phmsa.dot.gov> of certain events.

(1) ...

(iv) Construction of a new underground natural gas storage facility or the **abandonment**, drilling or well workover (including replacement of wellhead, tubing, or a new casing) of an injection, withdrawal, monitoring, or observation well for an underground natural gas storage facility.

through the National Registry of Operators at <https://portal.phmsa.dot.gov> of certain events.

(1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:

(i) ...

(iv) Maintenance of a UNGSF that involves the plugging or abandonment of a well, or that requires a workover rig and costs \$200,000 or more for an individual well, including its wellhead. If 60-days' notice is not feasible due to an emergency, an operator must promptly respond to the emergency and notify PHMSA as soon as practicable;

EQT failed to provide a written notification to PHMSA of certain maintenance activities, including the plugging or abandonment of a well, not later than 60 days before that activity occurs.

During the inspection, PHMSA reviewed the annual reports submitted by EQT for its underground natural gas storage facilities for calendar years 2018, 2019, and 2020. Among other items, the operator is required to report in line C.10 of the report form the number of wells that were plugged and abandoned in the calendar year. EQT reported that 2 wells were plugged and abandoned in the Logansport storage field. Well 8271 was plugged and abandoned in 2018, and Well 6190 was plugged and abandoned in 2019. No notification was made for either of these events; the plugging and abandonments were documented, after the fact, in the annual reports.

Therefore, EQT failed in 2 instances to provide notification to PHMSA of the maintenance activities, plugging and abandonment of 2 wells, either 60 days in advance, or as soon as practicable if due to an emergency, as required by § 191.22(c)(iv).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed \$209,002 per violation per day, with a maximum penalty not to exceed \$2,090,022.

We have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in Equitrans Midstream Corporation being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2022-020-WL**. 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).

Sincerely,

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