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May 4, 2023

Robert Burrough,
Director, Eastern Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: CPF 1-2023-035-WL

Dear Mr. Burrough,

This letter is in response to CPF 1-2023-035-WL issued to Equitrans Midstream Corporation (ETRN or Equitrans) on April 6, 2023, by the Pipeline and Hazardous Materials Safety Administration (PHMSA) regarding the control room management inspection (CRM) conducted on December 6, 2021 through December 10, 2022 in Canonsburg, Pennsylvania. Equitrans response is as follows:

PHMSA Item No. 1: Controller Hours-of-Service §192.631 (d)(4).

Equitrans Response No. 1: ETRN added hours of service (HOS) tracking for control room supervisors, managers, and the CRM analyst to the CRM Plan, Section 501 *Shift Lengths and Rotations* on February 28, 2022. ETRN also developed a formal rotation schedule, titled as the *Gas Control Supervisor On-Call HOS Tracker*, for the control room supervisors, managers, and CRM analyst. The CRM Plan Section 501 was revised to add the following language:

Section 500 – Fatigue Management

501 – Shift Lengths and Rotations (192.631(d)(1) and 192.631(d)(4))

The control room manager, supervisors and the CRM analyst are operator qualified and may have to assume responsibility for operating the system in extreme emergencies. If this is necessary, the hours of service for the manager, supervisors and the CRM analyst are self-reported on the HOS tracker and should not exceed the limited 65 hours in any normal consecutive shift work schedule. If the limit of hours of work is reached, the manager, supervisors and CRM analyst should receive a minimum period of 35 hours of time off from work.

The control room manager, supervisors, and the CRM analyst are responsible for recording hours of service worked each week. Members of the CRM Team will work rotating 9/80 schedules divided into 2 groups (Schedule A & Schedule B). In an 80 hour pay period, employees work eight 9 - hour days and one 8-hour day, with the tenth



day off. The CRM Team HOS week is Monday through Friday. In the first week, employees will work nine hours Monday through Thursday and eight hours on Friday. In the second week, employees will work nine hours Monday through Thursday and are off on Friday. The core work hours are: Nine-hour day - Start 7:00 a.m.; finish 5:00 p.m., with a one-hour lunch break. Eight-hour day – Start 7:00 a.m.; finish 4:00 p.m., with a one-hour lunch break.

PHMSA Item No. 2: Annual review of the controller training program, \$192.631 (h)

Equitrans Response No. 2:

At the time of the inspection, ETRN had a separate policy document titled *Equitrans Midstream Control Room Management Training Plan* and a training content document titled *Gas Control Training Plan*. On February 28, 2022, the two documents were combined and titled *Equitrans Midstream Control Room Management Training Plan* (attached) as outlined in the Log of revisions on page 23. The combination of the two plans ensures that both the policy and content of the Control Room Management Training Plan are reviewed annually. The annual review of the combined documents has been in effect since February 28, 2022 and section 10.1 on page 6 identifies the departments represented in the review. Since February 28, 2022, an additional review and revision was completed as on October 13, 2022 as shown in the Log of revisions on page 23.

Equitrans is confident that these matters have been fully addressed. Please contact Jacob Lyons at (412) 295-3962 or by email at jlyons@equitransmidstream.com if you have any questions or need additional information.

DocuSigned by:

Cliff Baker
Sincerely,

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Cliff Baker, SVP Commercial Development & Operations