



EQT CORPORATION

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January 13, 2025

VIA ELECTRONIC MAIL

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

RE: CPF No. 1-2024-039-NOPV

Dear Mr. Burrough:

EQT Midstream HoldCo, LLC (EQT or the Company) submits this response to the Notice of Probable Violation and Proposed Compliance Order (Notice) issued on November 6, 2024.¹

Item #1

The Pipeline and Hazardous Materials Safety Administration (PHMSA) alleged that EQT failed to identify the correct boundaries of three moderate consequence area (MCA) segments. While EQT identified the areas as MCAs, PHMSA asserted that the Company should have extended the boundary of the MCA to account for new construction.

EQT is not contesting this item. In response to the Proposed Compliance Order, the Company has reviewed section 14 of its Integrity Management Plan and discussed internally how this issue could be avoided in the future. EQT will conduct retraining of certain personnel to ensure that the correct boundaries of each MCA are identified.

Item #2

In the Notice, PHMSA alleged that EQT had violated section 192.605(b)(1) by “failing to address the requirements of section 192.605 as it applies to section 192.712.”² Specifically, PHMSA asserted that EQT’s written procedure failed to “address the requirements of section 192.712 in its entirety”³ and the Company’s procedures did not include an obligation to analyze cracks and crack-like defects.⁴

EQT discussed this issue during the inspection and pointed out that it has not experienced susceptibility to cracking, has had no history of SCC or cyclic loading, and if a crack were to

¹ As indicated in its correspondence dated December 12, 2024, EQT was not served with this Notice. The Company became aware of the Notice posted to PHMSA’s Enforcement Transparency website and requested an extension to respond. As a result, PHMSA granted a request for extension to respond until January 11, 2025. See PHMSA Letter dated January 7, 2025. Therefore, this response is timely.

² Notice, at 3.

³ *Id.*

⁴ Violation Report, at 8.

be discovered, the Company would treat all cracks and crack-like defects as an immediate repair. Since any crack would be removed or repaired, there is no need for an extensive procedure evaluating if the crack could remain in the pipeline system.

In an effort to resolve any further concerns and prior to receiving the Notice, EQT added a cross-reference to its Integrity Management Plan in its Operations and Maintenance procedure and made other revisions. *See* section 7.20.4 of Attachment 1.

Since EQT's procedure is more conservative than the regulatory requirement, there is no violation of section 192.605(b)(1). On this basis, EQT requests that this item be withdrawn. If PHMSA does not agree to withdraw this item, EQT requests that this item be converted to a warning item based on the Company's good faith effort to implement the regulations.

Please let me know if you have any questions.

Sincerely,



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Justin Trettel

Vice President

Midstream

Enclosure (Revised Operations and Maintenance Manual)