

WARNING LETTER

VIA ELECTRONIC MAIL TO: toby.rice@eqt.com

August 25, 2025

Mr. Toby Rice
President and Chief Executive Officer
EQT Production
2071 Garards Fort Road
Waynesburg, Pennsylvania 15370

CPF 1-2025-009-WL

Dear Mr. Rice:

From April 8 through April 9, 2025, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected EQT Production's (EQT) Ohio Valley Connector Expansion (OVCEX) project in Canonsburg, Pennsylvania; Greene County, Pennsylvania; and Wetzel County, 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 Operators**
 - (a)
 - (c) **Changes.** Each operator of a gas pipeline, gas pipeline facility, UNGSF, LNG plant, or LNG facility must notify PHMSA electronically 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) Construction of any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs \$10 million or more. If 60-day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable;

EQT failed to provide notification to PHMSA not later than 60 days before the construction of a planned rehabilitation, replacement, modification, upgrade, uprate, or update of its facilities that costs \$10 million or more. Specifically, EQT failed to timely notify PHMSA of its OVCX construction project in Monroe County, Ohio; Greene County, Pennsylvania; and Wetzel County, West Virginia.

From March 24 through March 26, 2025, PHMSA and EQT had an integrated inspection screening meeting. EQT stated that it had recently completed construction activities related to several compressor stations, and that other commissioning activities were already underway. EQT stated that the construction activities commenced in July 2024. However, EQT was unable to provide specifics on the project scope, including compressor stations involved, the total project cost, or whether any notification(s) were submitted to PHMSA, as required by section 191.22(c)(1)(i).

EQT subsequently completed a *National Registry Notification – F-20250327-66218* (03/27/2025) (Construction Notification). From April 8 through 9, 2025, PHMSA Eastern Region construction team conducted an inspection of OVCX project records and field observations.

The Construction Notification, required not later than 60 days prior to commencing construction, was submitted 262 days after the anticipated start date (July 8, 2024) listed in Step 2, and 603 days after the actual project commencement date of August 3, 2023 according to EQT, *PHMSA-EQT Email Correspondence* (04/11/2025).

The Construction Notification Step 2 stated an anticipated start date of field work activities of July 8, 2024, and Step 4 stated in part:

- addition of two Taurus 70 turbines at the existing Cygrymus Compressor Station with additional mechanical and electrical equipment to support the horsepower (HP) increase in Greene County, PA;
- addition of one Mars 100 compressor unit to support the sole existing Mars 100 compressor unit, at the extant Corona Compressor Station, with supplementary mechanical and electrical equipment to support the HP increase in Wetzel County, WV;
- addition of one Titan 130 to the two existing Taurus 70 compressor units at the existing Plasma Compressor Station with additional mechanical and electrical equipment to support the HP increase in Monroe County, OH;
- approximately 0.5-mile of new 16-inch-diameter natural gas pipeline (H-327) in Greene County, PA;
- approximately 0.5-mile of new 12-inch-diameter natural gas pipeline (H-328) in Greene County, PA;
- approximately 3.7 miles of new 24-inch-diameter natural gas pipeline (H-326) in Wetzel County, WV;
- approximately 129 feet (0.02-mile) of new eight-inch-diameter natural gas pipeline (H-329) in Wetzel County, WV;
- approximately 0.7-mile of new 16-inch-diameter natural gas pipeline (H-330) in Wetzel County, WV;
- approximately 0.09-mile of new 16-inch-diameter natural gas pipeline (H-330 Spur) in Wetzel County, WV;

- approximately 160 feet (0.03-mile) of new 12-inch-diameter natural gas pipeline (Logansport Spur) in Wetzel County, WV

In *PHMSA – EQT Email Communication* (03/28/2025), EQT confirmed they missed the section 191.22 notification timeframe.

Per *Equitrans Midstream – Ohio Valley Connector Expansion Project Website*, the *Federal Register – Equitrans, L.P, Notice of Availability of the Final Environmental Impact Statement for the Proposed Ohio Valley Connector Expansion Project* (01/31/2023) and *PHMSA-EQT Email Correspondence* (04/11/2025), the project's commencement date was August 3, 2023, and not July 8, 2024. Furthermore, the total cost for the project was estimated at \$160 million which exceeds the threshold of reporting, per section 191.22(c)(1)(i).

Therefore, EQT failed to provide notification to PHMSA of its OVCX construction project not later than 60 days before the event, specifically construction associated with its planned rehabilitation, replacement, modification, upgrade, uprate or update of its facilities located in Monroe County, Ohio; Greene County, Pennsylvania; and Wetzel County, West Virginia that costs \$10 million or more, in accordance with section 191.22(c)(1)(i).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024, the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023, the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not 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.

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 EQT Production 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 1-2025-009-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