

November 17, 2025

Mr. 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 No. 1-2025-033-NOPV-Response to Notice of Probable Violation and Proposed Civil Penalty

Dear Mr. Burrough:

In response to the above-referenced Notice of Probable Violation and Proposed Civil Penalty (Notice) issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA), EQT Production Company (EQT) respectfully requests an informal meeting pursuant to 49 U.S.C. § 60117(b)(1)(B).

To preserve its rights, EQT is also submitting a Request for Hearing and its Preliminary Statement of Issues pursuant to 49 C.F.R. § 190.211(b). EQT hopes that a hearing will be unnecessary and that the parties can resolve this matter informally. EQT respectfully requests that PHMSA refrain from scheduling a hearing to provide the parties with sufficient time to attempt to informally resolve this Notice.

Please feel free to contact me with any questions.

Sincerely,



Brianne K. Kurdock

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY**

In the Matter of

EQT Production Company,

Respondent.

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CPF No. 1-2025-033-NOPV

**REQUEST FOR INFORMAL CONFERENCE, REQUEST FOR HEARING,
PRELIMINARY STATEMENT OF ISSUES, AND REQUEST FOR DOCUMENTS**

I. Request for Informal Conference

Pursuant to 49 U.S.C. § 60117(b)(1)(B)(i)-(ii), EQT Production (EQT) respectfully requests an informal conference to discuss the allegations and proposed civil penalties in the above-referenced Notice of Probable Violation and Proposed Civil Penalty (NOPV). EQT is hopeful that through further discussion of the relevant facts and circumstances, these allegations can be resolved without a hearing.

II. Request for Hearing

Pursuant to 49 C.F.R. §§ 190.208(a)(4) and 190.211(b), EQT respectfully requests an in-person hearing at PHMSA's Eastern Region office to discuss the alleged violations and proposed civil penalties. If a hearing is held, EQT may be represented by counsel at the hearing.

III. Preliminary Statement of Issues

EQT respectfully contests the allegations and proposed civil penalties in the NOPV. At the hearing, EQT intends to raise the following issues:

Item 1 – 49 C.F.R. § 192.12(b)(2)

A. Whether the allegation of violation is supported by the facts and the evidence.

- B. Whether PHMSA has met its burden of proof that a violation occurred.
- C. Whether the proposed civil penalty is appropriate or should be reduced or withdrawn.

Item 2 – 49 C.F.R. § 192.12(c)

- A. Whether the allegation of violation is supported by the facts and the evidence.
- B. Whether PHMSA has met its burden of proof that a violation occurred.
- C. Whether the proposed civil penalty is appropriate or should be reduced or withdrawn.

Item 3 – 49 C.F.R. § 192.12(c)

- A. Whether the probable violation is supported by the facts and the evidence.
- B. Whether the warning is appropriate or should be withdrawn.

EQT reserves the right to supplement this preliminary statement of issues in response to any additional information or arguments from PHMSA.

IV. Request for Documents

Pursuant to 49 C.F.R. § 190.212(c)(2), (c)(3), and (c)(7) and in order to ensure a full and fair hearing, EQT respectfully requests that PHMSA provide a copy of any notes, documents, or electronic records pertaining to the investigation that occurred in this case. These materials are pertinent to the matters of fact and law asserted and must therefore be provided pursuant to 49 U.S.C. § 60117(b)(1)(C) and the Chief Counsel’s Memo dated May 29, 2025.

Respectfully submitted this 17th day of
November 2025



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