



U.S. Department
of Transportation
**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, New Jersey 08628
609.771.7800

NOTICE OF AMENDMENT

VIA EMAIL TO: toby.rice@eqt.com

July 02, 2026

Toby Rice
Chief Executive Officer
EQT Midstream Company LLC
2071 Garards Fort Road
Waynesburg, PA 15370

CPF 1-2026-033-NOA

Dear Mr. Rice:

From August 11 through August 20, 2025, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), Eastern Region, pursuant to Chapter 601 of Title 49 United States Code (U.S.C.), inspected EQT Midstream Company LLC's (EQT or Respondent) Public Awareness Program (PAP) records and procedures in Canonsburg, Pennsylvania.

As a result of the inspection, PHMSA has identified apparent inadequacies in EQT's plans or procedures. The items inspected and the inadequacies are described below:

1. **§ 192.616 Public awareness.**
 - (a) **Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, *see* § 192.7).**

EQT's written continuing public education program procedures were inadequate to assure safe operation of a pipeline facility. Specifically, EQT failed to develop a written continuing public education program that follows the guidance provided in sections 6.2 and 7.1 in API RP 1162

governing program enhancements, in accordance with section 192.616(a).

Section 6.2 in API RP 1162 required implementation of a step for assessing relevant factors along the pipeline route included in the operator's PAP to consider what components of the PAP should be enhanced. Section 6.2 in API RP 1162 stated that it is recommended that the operator consider each of the following factors applied along the entire route of the pipeline system:

- Potential hazards
- High Consequence Areas
- Population density
- Land development activity
- Land farming activity
- Third-party damage incidents
- Environmental considerations
- Pipeline history in an area
- Specific local situations
- Regulatory requirements
- Results from previous Public Awareness Program evaluations
- Other relevant needs.

Section 7.1, subsection f, in API RP 1162 required the written PAP to include “[i]dentification of program enhancements, beyond the baseline program, and the basis for implementing such enhancements.”

During the inspection, Eastern Region reviewed EQT's PAP. Section 1.4, subsection 2, in EQT's PAP assigned the Program Administrator the task of assessing considerations for supplemental program enhancements. However, EQT's PAP failed to include a step for assessing the relevant factors in API RP 1162 section 6.2 to consider what components of the PAP should be enhanced and failed to include the identification of program enhancements beyond the baseline program and the basis for implementing such enhancements. Because this step, and the identification of and basis for program enhancements beyond the baseline program, was not included in EQT's PAP, EQT failed to develop a written continuing education program that follows the guidance provided in sections 6.2 and 7.1 in API RP 1162.

Therefore, EQT's written continuing public education program procedures were inadequate to assure safe operation of a pipeline facility. PHMSA proposes that EQT revise its procedures to address the above deficiency.

2. § 192.616 Public awareness.

(a) Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, *see* § 192.7).

(b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

EQT's written continuing public education program procedures were inadequate to assure safe operation of a pipeline facility. Specifically, EQT failed to develop a procedure that assesses the unique attributes and characteristics of its pipelines and facilities in accordance with section 192.616(b).

During the inspection, Eastern Region reviewed EQT's PAP. The PAP failed to address how EQT has and continues to assess any unique attributes of its pipelines and facilities, such as pipe characteristics, presence in highly populated areas, potential impact consequences, commodities being transported (natural gas versus hazardous liquids), and facility proximity to the affected public audience group. In addition, the PAP did not assess the uniqueness of its pipeline components and locations by considering things such as storage fields, farm taps, distant and High Consequence Area valve sites, compressor stations, metering stations, and odorant systems.

After the inspection, on November 10, 2025, EQT provided a written response to Eastern Region's inspection findings. In its response, EQT provided proposed draft language to add to its PAP regarding the identification of its pipelines and facilities included in the program. However, the proposed amendment language failed to include an assessment of the unique attributes and characteristics of its pipelines and facilities included in the program.

Therefore, EQT's written continuing public education program procedures were inadequate to assure safe operation of a pipeline facility. PHMSA proposes that EQT revise its procedures to address the above deficiency.

3. § 192.616 Public awareness.

(a) Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, *see* § 192.7).

EQT's written continuing public education program procedures were inadequate to assure safe operation of a pipeline facility. Specifically, EQT failed to develop a process in its PAP to periodically evaluate the PAP's effectiveness and implementation in accordance with section 8 in API RP 1162.

Section 8 in API 1162 states the following, in part:

This section provides guidance to operators on how to periodically evaluate their Public Awareness Programs. The overall written plan for the Public Awareness Program should include a section describing the operator's evaluation program that includes the baseline elements described in the following paragraphs. Also included are suggestions for operators to consider in periodically supplementing their evaluation efforts in a particular segment, with a selected stakeholder audience or to provide greater depth of evaluation. This section includes only a brief description of each element. Appendix E provides additional explanations and examples for operator personnel who are new to developing Public Awareness Program evaluations.

During the inspection, Eastern Region requested to review EQT's Public Awareness Program evaluation procedures. EQT presented section 10 in their latest PAP. Section 10 failed to adequately describe the process that EQT would follow to conduct its PAP annual implementation audits and how the implementation of supplemental actions to improve the program would be tracked prior to the next evaluation cycle. In addition, regarding effectiveness evaluation, the PAP failed to explain the four measurement elements found in section 8.4 in API RP 1162 in a structured manner to ensure a consistent process for verifying the program's effectiveness and to adequately compare the measures against each well-defined criterion to develop supplemental actions to improve the PAP.

For example, the methods used to obtain information relative to the performance measurement elements must be pre-tested in accordance with section 8.4.2 in API RP 1162. Appendix E.3.4 in API RP 1162 also provides further guidance on the subject. However, EQT's PAP failed to include procedures requiring pre-testing of the methods used to obtain information relative to the performance measurements elements. Finally, section 10 in EQT's PAP failed to discuss a management of change process to effectively communicate any implemented actions to the proper responsible personnel following the occurrence of a major redesign as required by section 8.5 in API RP 1162.

Therefore, EQT's written continuing public education program procedures were inadequate to assure safe operation of a pipeline facility. PHMSA proposes that EQT revise its procedures to address the above deficiency.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 CFR § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Enforcement Proceedings.

Please refer to this document and note the response options. Be advised that all material Respondent submits in response to this enforcement action is subject to being made publicly available. If Respondent believes that any portion of its responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document, Respondent must provide a second copy of the document with the portions Respondent believes qualify for confidential treatment redacted and an explanation of why Respondent believes the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Following the receipt of this Notice, Respondent has 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211. If Respondent does not respond within 30 days of receipt of this Notice, this constitutes a waiver of Respondent's right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to Respondent and to issue an Order Directing Amendment. If Respondent's plans or procedures are found inadequate as alleged in this Notice, Respondent may be ordered to amend its plans or procedures to correct the inadequacies (49 CFR § 190.206). If Respondent is not contesting this Notice, we propose that Respondent submit its amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in Respondent's amended procedures, this enforcement action will be closed.

It is requested (not mandated) that EQT Midstream Company LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2026-033-NOA** and, for each document Respondent submits, please provide a copy in electronic format whenever possible.

Sincerely,

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

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*

cc: Brett Butterworth, Compliance Officer, EQT, brett.butterworth@eqt.com
Justin Trettel, Vice President, Midstream, EQT, justin.trettel@eqt.com