

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 15, 1998

Mr. Charles Rankin
Vice President, Operations
Equitable Resources
420 Boulevard of the Allies
Pittsburgh, PA 15219

CPF No. 18104C

Dear Mr. Rankin:

On May 20, 1996, representatives of the Office of Pipeline Safety (OPS), Eastern Region, pursuant to Chapter 601 of 49 United States Code, conducted an on-site inspection of Equitable Resources records and facilities in Pratt Storage Field, in Waynesburg, Pennsylvania. This was a part of the specialized inspection of transmission pipelines associated with storage fields. The inspection was limited to pipelines that transport gas in and out of the storage field.

As a result of the inspection we are concerned about your monitoring practice for internal corrosion control for pipelines that transport gas in or out of the above storage field. Except testing for hydrogen sulfide (H₂S) once a year, your internal corrosion procedures did not include any other sampling activities to test fluids for presence of oxygen, solids such as iron, manganese, and chloride, and of bacteria content such as acid producing and sulfate reducing bacteria.

It has been a common practice in the industry for a natural gas storage field operator to test samples for the presence of corrosive materials. I recognize that Equitable has had no corrosion leaks at the Pratt Storage Field, and that every storage field has different characteristics. However, two operators of the five operators surveyed in our investigation, after testing for the above, found they needed to initiate programs at specific fields to help minimize potential internal corrosion.

Furthermore, under § 192.613(a), Continuing Surveillance of the Federal pipeline safety regulations, we have a concern that you failed to take appropriate action to protect the wellhead and above ground piping at Well No. 3644. During the field inspection conducted in 5/22/96, several types of farming equipment, possibly owned by nearby residents, were found laying on the ground in close proximity to the wellhead and piping. There was no protection from damage to the wellhead and the above ground piping.

We recommend that you consider selecting a representative sample of locations on the above storage field pipeline system to be evaluated for corrosion and corrosive agents. Consideration should also be given to locations in close proximity to human dwellings or where people gather.

I am also enclosing a copy of our report "Specialized Inspection Report of Natural Gas Storage Fields", dated March 1998, for your information.

Please let us know what is your course of action. We appreciate your cooperation.

Sincerely,

William H. Gute
Eastern Regional Director
Office of Pipeline Safety

Enclosure

PNGUYEN/sj/DPS-24/64581/4/15/98

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cc: DPS-22.1, DPS-24, All Regions, NJDO, Chuck, Atif, Phillip, Joe Finnan/PA PUC