



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

820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628  
**609.989.2171**

**NOTICE OF PROBABLE VIOLATION  
PROPOSED CIVIL PENALTY  
and  
PROPOSED COMPLIANCE ORDER**

**OVERNIGHT EXPRESS DELIVERY**

July 1, 2014

Robert Cooper  
Vice President of Engineering  
EQT Midstream  
625 Liberty Avenue  
Pittsburgh, PA 15222

**CPF 1-2014-1007**

Dear Mr. Cooper:

On November 16, 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code reviewed EQT Midstream's (EQT) Safety-Related Condition (SRC) Report ( Report # 2012106) submission for its Waynesburg, Pennsylvania Compressor Station (Pratt Compressor Station).

As a result of the review and further analysis, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

**1. §192.605 Procedural manual for operations, maintenance, and emergencies.**

**(a) *General.* Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.**

**(b) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**

**(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.**

EQT's procedural manual for operations and maintenance (O&M) did not have a written process for the Pratt Compressor Station that addressed routing gas through the coolers before exiting the station.

On November 14, 2012, EQT submitted a SRC Report to PHMSA. EQT reported that a safety-related condition<sup>1</sup> existed at its Pratt Compressor Station on November 7, 2012.

In the SRC Report, EQT stated that on November 7, 2012 it discovered pipeline #GSF-360 had elongated and shifted off pipeline supports. The pipeline had expanded longitudinally approximately seven (7) inches. EQT categorized the SRC as a “[c]ondition that could lead to an imminent hazard and cause a 20% or more reduction in operating pressure or shutdown of operation. . . .” EQT also stated in the report that it took corrective action by shutting down and blowing down (removing gas from) the pipeline. EQT reduced the pressure in #GSF-360 from 538 psig to 0 psig.

Subsequently, on November 16, 2012, an EQT representative provided an update and a photograph showing that pipeline #GSF-360 had shifted off pipeline supports.

During the period between December 26, 2012 and February 11, 2013, a PHMSA inspector exchanged emails with EQT representatives relating to the occurrence of the SRC. EQT determined the root cause of the line expansion and movement. The discharge temperature on #GSF-360 had reached approximately 180°F due to EQT personnel inadvertently bypassing the station coolers which caused the longitudinal expansion of the pipeline. EQT corrected the situation and placed the affected section of the pipeline back in service on December 21, 2012.

The PHMSA inspector requested a copy of the O&M procedure for the operation of pipeline #GSF-360 at Pratt Compressor Station, including related equipment (e.g. the cooler) in effect at the time of this SRC. The EQT representative stated that the O&M procedure existing at the time of the SRC did not specifically require routing of gas through the coolers. The EQT representative also stated that EQT established a separate procedure for cooler operations at the Pratt Compressor Station following the SRC.

The PHMSA inspector requested a copy of the original and supplemental procedure. The EQT representative provided the original start-up and shut-down procedure titled *Start-up Shutdown Engine/ Compressor Units 1, 2, 3, 4 & 5 Pratt #47* and the new additional procedure titled *Pratt Station Required Procedures For Operations*.

The PHMSA inspector reviewed the procedure, *Start-up Shutdown Engine/ Compressor Units 1, 2, 3, 4 & 5 Pratt #47*, and noted that the procedure did not have a process for routing gas through the coolers before exiting the station. The PHMSA inspector also reviewed the new additional procedure, *Pratt Station Required Procedures For Operations*, which does state that “the unit discharge must always be routed through a gas cooler before exiting the yard or entering the second unit when 2 staging is required.”

The EQT representative indicated that the Pratt Compressor Station is the only facility that was designed to allow the gas to bypass the coolers. However, EQT's O&M manual did not include a written process to require routing gas through the coolers before exiting the compressor station until after the SRC had occurred.

---

<sup>1</sup> See, 49 CFR §191.23 Reporting safety-related conditions.

Proposed Civil Penalty

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation and has recommended that you be preliminarily assessed a civil penalty of \$28,800 as follows:

<u>Item number</u>	<u>PENALTY</u>
1	\$28,800

Proposed Compliance Order

With respect to item 1 pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to EQT. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. All material you submit in response to this enforcement action may be 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). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your 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 you and to issue a Final Order.

Please submit all correspondence in this matter to Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628. Please refer to **CPF 1-2014-1007** on each document you submit and please, whenever possible, provide a signed PDF copy in electronic format. Smaller files may be emailed to [Byron.Coy@dot.gov](mailto:Byron.Coy@dot.gov). Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

Byron Coy, PE  
 Director, Eastern Region  
 Pipeline and Hazardous Materials Safety Administration

Enclosures: *Proposed Compliance Order*  
*Response Options for Pipeline Operators in Compliance Proceedings*

**PROPOSED COMPLIANCE ORDER**

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to EQT Midstream (EQT) a Compliance Order incorporating the following remedial requirements to ensure the compliance of EQT with the pipeline safety regulations:

1. With regards to Item Number 1 of the Notice pertaining to EQT not having a written process for routing gas through the coolers before exiting the Pratt Compressor Station in its Operations and Maintenance (O&M) Manual, EQT must:
  - a. Amend its procedure/s for *Start-up Shutdown Engine/ Compressor Units 1, 2, 3, 4 & 5 Pratt #47* to include provisions for station cooler operations. Related procedures must include the date originated and the effective date of the last revision.
  - b. Provide documentation that demonstrates it has reviewed the procedure(s) (e.g. *Start-up Shutdown Engine/ Compressor Units 1, 2, 3, 4 & 5 Pratt #47* and *Pratt Station Required Procedures For Operations*) in accordance with section 49 CFR 192.605(a).
2. EQT must submit amended procedure(s) and documentation that is stipulated in the above item within sixty (60) days after receipt of a Final Order.
3. It is requested (not mandated) that EQT maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Byron Coy, PE, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.