ENERGY TRANSFER

Pressure Protection and Relief Valve Capacity Verification

Standard Operating Procedures

Applicable to Hazardous Liquids Pipelines and Related Facilities

Code Reference :	**Procedure No.: HLM.04**	
49 CFR: 195.428	***Effective Date: 11/1/2015***	**Page 1 of 10**

1.0 Procedure Description

This Standard Operating Procedure (SOP) describes the data verification and relief valve capacity calculation requirements necessary to protect the Maximum Operating Pressure (MOP) within the MOP plus the build-up allowed for operation of pressure limiting and control devices.

2.0 Scope

This SOP covers the requirements for MOP recognition and protection, overpressure protection (OPP) determination, MOP protection methods, overpressure protection methods, device overpressure protection set point determination, and relief valve capacity calculation/adequacy verification.

3.0 Applicability

This SOP applies to all pump stations, mainline piping, laterals, branches, offshore facilities, and measurement stations.

It is the responsibility of field operations and Liquid Control personnel to operate the system in a manner that prevents pressures from exceeding MOP.

If control systems were to inadvertently allow pressures to rise above MOP, or if pipeline conditions change (causing pressures to rise above MOP), immediate action shall be taken by operating personnel to lower the pressure t below MOP.

If a part of the pipeline system is subjected to pressures above MOP on a recurring basis, the system and controls shall be promptly evaluated. The evaluation will determine if re-calibration of control systems, changes in maintenance procedures, or system equipment modifications are required to prevent the pipeline system(s) from operating above the MOP in the future.

4.0 Frequency

Complete capacity verification with intervals as follows:

- Crude or Product: once per calendar year, not exceeding fifteen (15) months
- HVL: twice per calendar year, not exceeding seven and a half (7 ½) months

As Required (Unscheduled): Establish and/or confirm set points and capacities when new facilities and equipment are added, modifications are made, and/or MOP changes are made to existing facilities.

5.0 Governance

The following table describes the responsibility, accountability, and authority for this SOP.

Function	Responsibility	Accountability	Authority
All Functions	Operations Personnel	Operations Manager	Director of Operations

6.0 Terms and Definitions

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *SOP HLA.01 Glossary and Acronyms*.

Terms	Definitions
Alarms	An extension of the control system, which continuously monitor operating conditions and are used to notify the station operator and/or Liquid Control when operating conditions vary from the intended parameters.
Maximum Operating Pressure (MOP)	The maximum pressure at which the pipeline may be operated as determined by *SOP HLB.10 Determination of MOP*
Maximum Allowable Working Pressure (MAWP) or Maximum Working Pressure (MWP)	The maximum pressure at which an equipment manufacturer's components may be operated. The OPP normally must be at or below the MAWP or MWP.
Primary Protection for Maximum Operating Pressure (MOP)	An individual, control system, and/or device whose primary purpose is to ensure that a pipeline or segment of pipeline is not operated at a pressure that exceeds the MOP. MOP (primary) pressure protection cannot share supply, instrumentation, or any other hardware/components with OPP (secondary).

Terms	**Definitions**
	1.Individual • **Liquid Control:** Configures pump station(s) and pipeline(s) operations to maintain pipeline pressure at or below MOP. • **OQ Qualified Employee:** Manually monitors and controls MOP as part of the assigned duties. 2. Control System • **Automation:** Control MOP at pump stations by company programmed and configured station level automation. 3. Devices • **High Pressure Shut Down:** A device designed to shut down individual pumps to protect MOP. • **Flow Control with Pressure Override:** A valve with controller designed to control flow with an override device set to protect pressure if the pressure set point and/or MOP is exceeded. • **Automatic Throttling Valve (ATV):** A valve with an operator and controls that throttles at a pressure set point. • **Automatic Isolation Valve (AIV)**: A valve with an operator and controls that closes (100%) when the set point is reached. Must be re-opened manually.
Secondary Protection for Overpressure Protection (OP)	An individual and/or device whose purpose is to prevent a pipeline or segment of pipeline from exceeding the MOP plus the build-up, not to exceed 110% of MOP allowed for operation of pressure limiting and control devices (secondary).
Overpressure Protection Set point (OPS)	The set point of an overpressure protection device will not exceed MOP. The OPS will be equal to or less than of MOP, depending on the operating characteristics of the particular type of overpressure protection device.

7.0 Pressure Protection and Relief Valve Capacity Verification

Operations Personnel perform the following procedures described in this section:

- MOP/OPP Data Verification
- Relief Valve Capacity/Adequacy Verification
- Unscheduled Activities
- Pressure Gradient Protection Scheme Documentation (if applicable): Review with Facility Planning and Liquid Control

The following appendices at the end of this SOP contain essential requirements:

- *Appendix B: MOP and Overpressure Protection (OP) Methods*
- *Appendix C: Device Overpressure Protection Setpoint (OPS) Determination*
- *Appendix D: Determining Overpressure Protection Setpoints for Relief Valves*

CAUTION: Before any changes are made that potentially affect the MOP(s) of pipeline facilities, notify the Director of Operations, Pipeline Integrity, Liquid Control and Regulatory Compliance Departments.

NOTE:

- Any OPP value adopted for protection that is different from the calculated value must be approved by Director of Operations.
- Where multiple MOPs are protected, the OPP will be calculated based on the lowest MOP.

7.1 MOP/OPP Data Verification

Operations Personnel follows the steps below to verify MOP/OPP data.

Step	Activity
1	**RETRIEVE** MOP(s) for all pipelines and facilities from the most current data in the company database, for example MOP Data Report on WEB site or GIS.
2	**VERIFY** data recorded in the Electronic Maintenance System / Manual Compliance Tracking System / Applicable Form and Checklist Report is current.
3	**RECORD** in Electronic Maintenance System / Manual Compliance Tracking System: • Overpressure protection pressure (OPP) • Overpressure protection setpoint (OPS)
4	**VERIFY** MOP documentation is at the Area location for all inputs into the system originating from other companies/sources.

7.2 Relief Valve Capacity/ Adequacy Verification

Operations Personnel follow the steps below to verify adequacy of relief valve capacity.

Step	Activity
1	**VERIFY** data recorded in the Electronic Maintenance System / Manual Compliance Tracking System Checklist Report is current.
2	**RECORD** in Electronic Maintenance System / Manual Compliance Tracking System(utilize the applicable form(s) or electronic database) : • Regulator, pipeline, pump, third party (source) maximum flow capacity

Step	Activity
	• Relief valve flow capacity **CONFIRM** the relief valve flow capacity is equal to or greater than the source flow capacity**. VERIFY** no operational changes have occurred. If relief valve flow capacity is not sufficient provide additional relief capacity or other form of over pressure protection.
3	In the Electronic Maintenance System / Manual Compliance Tracking System, **VERIFY** the ratio is equal to or greater than 1.0.

7.3 Unscheduled Activities

Operations Personnel perform the procedures below for unscheduled activities.

7.3.1 New Facilities and/or Equipment

Follow the steps below for new facilities and equipment replacement.

Step	Activity
1	**ENTER** data in Electronic Maintenance System / Manual Compliance Tracking System
2	For Electronic Maintenance System / Manual Compliance Tracking System, **CONFIRM** the relief valve actual capacity is equal to or greater than the required capacity (ratio is equal to or greater than 1.0).
3	**RECORD** in Electronic Maintenance System / Manual Compliance Tracking System, utilize the applicable form(s) or electronic database. • Regulator, pipeline, pump, third party (source) maximum flow capacity • Relief valve flow capacity **CONFIRM** the relief valve flow capacity is equal to or greater than the source flow capacity**.**
4	**RECORD** in Electronic Maintenance System / Manual Compliance Tracking System: • Overpressure protection pressure (OPP) • Overpressure protection setpoint (OPS)

7.3.2 MOP/OPP/ OPS Changes

Follow the steps below for MOP/OPP/OPS changes that have been reviewed and approved in accordance with Section **7.0** and **7.1**.

Step	Activity
1	**UPDATE** data recorded in Electronic Maintenance System / Manual Compliance Tracking System.
2	**CONFIRM** the relief valve actual capacity is equal to or greater than the required capacity (ratio is equal to or greater than 1.0).
3	**UTILIZE** the applicable form(s) or electronic database for Annual Overpressure Set Point Calculation Record , **RECORD** in Electronic Maintenance System / Manual Compliance Tracking System: • Overpressure protection pressure (OPP) • Overpressure protection setpoint (OPS)

7.3.3 Relief Valve Flow/Capacity Changes

Follow the steps below for relief valve flow or capacity changes.

Step	Activity
1	**UPDATE** data in Electronic Maintenance System / Manual Compliance Tracking System
2	**UTILIZE** the applicable form(s) or electronic database for Relief Valve Capacity Calculation , **RECORD** in Electronic Maintenance System / Manual Compliance Tracking System: • Regulator, pipeline, pump, third party (source) maximum flow capacity • Relief valve flow capacity

8.0 Documentation Requirements

Record data in the electronic database or utilize the following form(s) as applicable:

- I.09.B Relief Valve Capacity Calculation
- I.09.C Annual Overpressure Set Point Calculation Record

Establish/Review Overpressure (Secondary) Determination Data

Activity	Reporting
High Pressure Shutdown Flow Control w/Pressure Override - OPP Automatic Throttling Valve (ATV) – OPP, Automatic Isolation Valve (AIV) – OPP, Relief Valve, or Unplanned	
Acknowledge the requirements as outlined in the SOP have been completed. Record exceptions in the description tab.	Electronic Maintenance System / Manual Compliance Tracking System Task (Comments Section)
Record Overpressure Protection Pressure (OPP).	Electronic Maintenance System / Manual Compliance Tracking System Task (Comments Section)

Activity	Reporting
Record Overpressure Protection Setpoint (OPS).	Electronic Maintenance System / Manual Compliance Tracking System Task (Comments Section)

Establish/Review Relief Valve Capacity Calculation/Adequacy Records

Activity	Reporting
Relief Valves	
Acknowledge the requirements as outlined in the SOP have been completed. Record exceptions in the description tab.	Electronic Maintenance System / Manual Compliance Tracking System Task (Comments Section)
Record relief valve flow capacity.	Electronic Maintenance System / Manual Compliance Tracking System Task (Comments Section)
Confirm the flow capacity of the relief valve is adequate to protect the facility from overpressure.	Electronic Maintenance System / Manual Compliance Tracking System Task (Comments Section)

9.0 References

HLB.10 Determination of MOP

Appendix A: OQ Task Requirements

There are no Operator Qualification (OQ) tasks required for this SOP.

Appendix B: MOP and Overpressure Protection (OP) Methods

The following are requirements for MOP and overprotection methods.

Appendix B.1: Pump Station (MOP Primary)

- Manned/Unmanned and Automated Pump Stations – Protect against operation above the MOP by utilizing the station control system to control pressures by controlling the operating horsepower and adjusting the throughput of operating units. Operating control system will be reduced in speed, adjust flow and/or shutdown the station, if necessary, to protect MOP.

Appendix B.2: Pump Station (OPP Secondary)

- Verify the pump station, suction and/or discharge pipeline(s), station piping, and facilities are protected from overpressure.
    - Manned/Unmanned and Automated Locations – Overpressure protection will be accomplished by the individual pump and station High Discharge Shut down device.
- If the Overpressure Protection device is a relief valve, verify capacity by visual observation as described in this SOP.
- Overpressure protection is required for each line of service that has a different MOP. Pumps with multiple lines of service will have either individual High Discharge Shutdown devices or multiple shutdown settings for each line of service with a different MOP.

Appendix B.4: Mainline Piping (MOP Primary)

- Operate the mainline piping at or below the MOP.
- Use the following methods for protecting the MOP(s):
    - Pump Station Operation – Control pump station discharge pressure at or below the MOP of the pipeline.
    - Liquid Control – Configure pump station(s) and pipeline(s) operations to maintain pipeline pressure at or below MOP. This method is sometimes utilized when the pipeline changes MOP between pump stations due to pipe diameter changes . The pipeline(s) pressure and flow is configured by Liquid Control to protect the lower MOP.

Appendix B.5: Mainline Piping (OPP Secondary)

- Verify overpressure protection for mainline piping is provided.
- Use one of the following methods for overpressure protection:
    - Upstream pump station overpressure protection (High Discharge Shutdown)
    - Automatic Throttling Valve (ATV)
    - Relief Valve – The relief valve must be at 100% capacity at the OPP.
- Verify mainline piping has overpressure protection that does not allow the Overpressure Protection Pressure (OPP) to be exceeded.

Appendix B.6: Meter Stations (MOP Primary)

- Operate Measurement stations at or below the MOP.
- Use one of the following methods for protecting the MOP(s):
    - Regulator – Set at or below the MOP as required.
    - Automatic Isolation Valve (AIV) – Set at or below MOP as required

- Delivery pressure maximum setpoint(s) may be reduced below the MOP based on contractual agreements and/or approved written request from the customer.

NOTE:
- For Meter Station receipt points, refer to the Mainline Piping Overpressure Protection Pressure Determination section above.
- For Meter Station delivery points, refer to the activities below.

- Verify Meter facilities have overpressure protection equipment and associated set points that do not allow the Overpressure Protection Pressure (OPP) to be exceeded.
- Determine the Overpressure Protection Pressure (OPP) by using the following guidelines. The OPP will be the lower of the following:
  - The pressure that equals the MOP of the protected facilities plus ten percent (10%). OPP equals 110% of MOP.
  - The pressure that equals the lowest Maximum Allowable Working Pressure (MAWP), as found on any ASME code stamped pressure vessel in the protected hazardous liquid path.
  - The manufacturer's maximum published operating pressure of any other equipment/component(s) in the protected hazardous liquid path.

Appendix B.7: Meter Stations (OPP Secondary)

- Verify overpressure protection is provided for M&R facilities.
- Use one of the following devices for overpressure protection:
  - Monitor Regulator
  - Flow Control with Pressure Override
  - Automatic Throttling Valve (ATV)
  - Relief Valve – The relief valve must be at <100% capacity at the MOP
- Document the MOP of third party pressure sources as described in this SOP, if applicable.
- If the Overpressure Protection device is a relief valve, document capacity calculation and verification as described in this SOP.
- Witness testing and inspection of third party owned and operated overpressure protection devices.

NOTE:
- At delivery Meter facilities, overpressure protection of the customer's facilities is the responsibility of the customer and shall not be assumed by the company, unless a contract states otherwise.
- If the Meter delivery pressure is reduced below the MOP based on contractual agreements and/or an approved written request from the customer, the OPP will be reduced to 110% of delivery pressure. A form I.09.C is not required as long as the reduced OPP value is still less than the company's MOP.

Appendix D: Determining Overpressure Protection Setpoints for Relief Valves

This appendix describes the requirements for determining the Overpressure Protection Setpoints (OPS) for spring loaded relief valves, pilot loaded relief valves, and spring and pilot operated regulators applied as relief valves.

Appendix D.1: Relief Valve – Spring Operated

For spring operated relief valves:

- Use the instructions provided by the manufacturer.
- Establish the setpoint for the device at the OPP less spring buildup (as specified by the manufacturer).

Appendix D.2: Relief Valve – Pilot Operated

For pilot operated relief valves:

- Establish the setpoint for the device at the Overpressure Protection Pressure (OPP).
- Establish the setpoint for the reseat pressure (where adjustable) on pilot operated relief valves at the MOP.

NOTE: The setpoint (OPS) of this relief valve is defined as the pressure at which the main valve is at 100% capacity, not the pressure that the pilot begins to weep, which may not be the same pressure.

Appendix D.3: Relief Valve – Spring or Pilot Operated Regulator Applied as a Relief Valve

For spring and pilot operated regulators applied as relief valves:

- Use the instructions provided by the manufacturer.
- Establish the setpoint for the device at a setpoint required to protect the OPP.

Appendix D.4: Relief Valve Outlet Piping Backpressure Calculation

To verify the level of backpressure in the relief valve outlet piping does not reduce the capacity of the relief valve, a one-time backpressure calculation for the outlet piping of all relief valves used for OPP that have a significant length of discharge vent piping is performed. Contact the Engineering Department for assistance in this process.

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Standard Operating Procedures

Applicable to Hazardous Liquids Pipelines and Related Facilities

Relief Valves Testing, Inspection, and Maintenance

Code Reference :	**Procedure No.: HLM.05**	
49 CFR: 195.428	***Effective Date: 04/01/18***	**Page 1 of 6**

1.0 Procedure Description

This Standard Operating Procedure (SOP) describes the testing and inspection and maintenance of relief valves used in liquid and storage tank service.

2.0 Scope

This SOP covers requirements for inspection and testing of pressure limiting and relief devices.

3.0 Applicability

This SOP applies to company facilities that are required to test, inspect, and perform maintenance on relief valves. Company installed overpressure protection devices are intended to protect facilities owned by the company unless contractual agreements specifically state otherwise.

4.0 Frequency

Crude & Product: Once per calendar year, not to exceed fifteen (15) months:

HVL Pipelines: twice per calendar year not to exceed 7 ½ months

Pressure Breakout tanks containing HVL: not exceeding 5 years as required: Repair or replace relief valves

5.0 Governance

The following table describes the responsibility, accountability, and authority for this SOP.

Function	Responsibility	Accountability	Authority
All Operations	Operations Personnel	Operations Manager	Director of Operations

6.0 Terms and Definitions

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *SOP* HL*A.01 Glossary and Acronyms*.

Terms	**Definitions**
Relief Valve	Spring-loaded relief valves whose primary purpose is overpressure protection of vessels, piping and facilities
Surge Relief Valve	A device which uses regulated nitrogen back pressure to open to a surge vessel or back to the pipeline system at a predetermined set point. This application may require a pressure build-up to achieve 100% capacity
Rupture Discs	Also known as rupture disk or bursting disc, a non-reclosing pressure relief device which provides a leak-tight seal
Spring Loaded Relief Valve	A device using a preloaded spring that opens a valve to atmosphere or to a vessel or back to the pipeline upon reaching an overpressure set point and closes when pressure falls below the reseat pressure. This device requires a pressure build-up to achieve 100% capacity

7.0 Relief Valves Testing, Inspection, and Maintenance

A member of Operations Personnel performs the following procedures described in this section:

- Prior to Testing and Inspection
- Annual / Semi- Annual Test and Inspection
- Testing Relief Valves Overhaul

7.1 Prior to Testing and Inspection and Overhaul

Perform the following steps prior to any test or inspection.

Code Reference :	**Procedure No.: HLM.05**	
49 CFR: 195.428	***Effective Date: 04/01/18***	**Page 3 of 6**

CAUTION: Overpressure of station components can cause personal injury or property damage or inadvertent alarms and / or shutdowns

Step	Activity
1	**DETERMINE** Overpressure Protection Setpoint (OPS) of relief valve using *HLM.04 Pressure Protection and Relief Valve Capacity Verification.*.
2	**COORDINATE** tests and inspections with Liquid Control and appropriate operating personnel.
3	**NOTIFY** Liquid Control and customers 24 hours in advance, if possible, prior to initiating and after completing relief valve test and inspection for those valves whose primary purpose is overpressure protection of piping and facilities
4	**MONITOR** pressures on any piping or equipment protected by the relief valve from the time the relief valve is isolated to the time it is returned to service.
5	In the case of an imminent overpressure situation, **TAKE** necessary actions to prevent over pressuring.

7.2 Annual and / or Semi-Annual Test and Inspection

Perform the following steps for annual and / or semi-annual tests and inspections of relief valves.

Step	Activity
1	**INSPECT** relief valves for leakage, proper installation, good mechanical condition, protection from dirt and liquid and physical damage.
2	**DETERMINE** if the relief valves are protected from: • Vibration • Water and dirt in the discharge piping, vent, or other port

	• External damage to risers or supply lines • Other conditions that may interfere with their proper operation, such as discharge piping modifications, which could limit capacity

7.2.1 Testing Relief Valves

Perform the following steps for tests, inspections, and maintenance of relief valves.

NOTE: Pressure Relief Valves should be installed with isolation valves

CAUTION: If applicable, monitor pressures on any piping or equipment protected by the relief valve from the time the relief valve is isolated to the time it is returned to service, so that an overpressure does not occur. Remove relief valve from service following current procedure regarding hazardous energy control (lockout/tagout).

Step	Activity
1	**INSPECT** block valves beneath relief valves to verify they are locked or sealed in the "open" position during normal operations.

CAUTION: Lock the block valves, under relief valves, in the "open" position, except during testing, inspection, or maintenance of the relief valve. If the block valve under the relief is not locked in the open position, someone could accidentally close the valve, which could cause over pressuring of the system which the relief valve protects.

Step	Activity
2	**REMOVE** locking device or sealing device from the isolation valve.
3	**CLOSE** the isolation valve.

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49 CFR: 195.428	***Effective Date: 04/01/18***	**Page 5 of 6**

Step	Activity
4	**INSTALL** a gauge and **MONITOR** the pressure on the inlet to the relief valve for a few minutes to **DETERMINE** if there is any leakage through the relief valve.
5	If leaks are detected, **REPAIR** or **REPLACE** worn or damaged parts.

NOTE: Refer to manufacturer's manuals for details on maintenance.

Step	Activity
6	**TEST** relief valves for correct set pressure and operation. **LOAD** external supply to sensing line by connecting to a pressure source.
7	**OPEN** supply valve and **POP** relief valve.
8	**DOCUMENT** the "As Found" pressure at which the relief valve activates. Utilize the applicable form(s) or electronic database.
9	If necessary, **ADJUST** or **REPAIR** and **RETEST. DOCUMENT** the "As Left" pressure setting.
10	**SHUT OFF** the supply valve and **DISCONNECT** the test hose.

NOTE:

- Refer to the manufacturer's instructions for testing procedures.
- To ENSURE valve is operating correctly, REPEAT the test a MINIMUM of three times. The pressures that valve opens and reseats is your 'as found' pressure. COMPARE pressure valve operated to the set point setting required for the device. The pressure at which the devices relieves and reseats should not exceed +0/- 5% of the required set point. DETERMINE if adjustments are required.

Step	Activity
11	To return the relief valve to service, OPEN the relief valve discharge isolation valve. Slowly **OPEN** the isolation valve to pressurize the relief valve.
12	**CHECK** the piping and tubing fittings for leaks.
13	**INSTALL** the locking or sealing device on the isolation valve.

8.0 Documentation Requirements

The following table describes the documentation and reporting requirements of this SOP.

- M.05.A Relief Valve Inspection

9.0 References

HLM.04 Pressure Protection and Relief Valve Capacity Verification.

Appendix A: OQ Task Requirements

The table below identifies the Operator Qualification (OQ) task requirements for this SOP.

If a Third Party is used for Relief Valve Testing verify OQ Qualifications of the individual performing the task.

Task Description	OQ Task
Commission and Maintain Spring Operated Relief Valves	PLOQ709A
Commission and Maintain Surge Relief Valve	PLOQ709D

ENERGY TRANSFER

Standard Operating Procedures

Applicable to Hazardous Liquids Pipelines and Related Facilities

Code Reference:	**Procedure No.: HLB.03**	
49 CFR 195.402	***Effective Date: 04/01/18***	**Page 1 of 10**

1.0 Procedure Description

This Standard Operating Procedure (SOP) describes how to purge facilities for maintenance and to prepare them for service.

2.0 Scope

Company personnel perform pipeline purging to remove air or nitrogen from the pipeline and subsequently replace it with product. In this case, purging is necessary to minimize inert constituents in the product and eliminate potentially combustible mixtures of vapor and air inside the pipeline. Similarly, company personnel perform pipeline purging with inert gas or compressed air to evacuate product from the pipeline to accommodate maintenance or pipeline inactivation.

3.0 Applicability

This SOP applies to pipelines, pump station piping, meter stations, and other related equipment.

4.0 Frequency

As required.

5.0 Governance

The following table describes the responsibility, accountability, and authority of the operations described in this SOP.

Function	Responsibility	Accountability	Authority
All Operations	Operations Personnel	Operations Manager	Operations Director

6.0 Terms and Definitions

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *SOP* HL*A.01 Glossary and Acronyms*.

Terms	Definitions
Hot tie-in	Performing a tie-in where liquid may be present
Lower Explosive Limit (LEL)	The Minimum concentration of a vapor in air to form an explosive mixture.
Frac Tank	Tank for capturing liquids extracted from the pipeline
Combustible Gas Indicator (CGI)	Certified Combustible Gas Detector
Stopple	Temporary block valves installed anywhere in a piping system. They are used to isolate a section of line for repairs or additions without interruption of service.

7.0 Purging

Purging is performed by introducing a continuous flow of product into one end of the pipeline and removing the vapors, inert gas, or liquids out the other end.

Before a pipeline or system is placed in service, all air must be purged to eliminate the possibility of a hazardous mixture of air and product and the potential interruption of service to a delivery customer.

Before a pipeline is taken out of service to accommodate maintenance, product must be evacuated and purged with inert gas or air.

The following procedures are described in this section:

- Purging and Blow-Down Safety
- Purging with Product
- Purging with Nitrogen

7.1 Purging and Blow-Down Safety

This procedure establishes the following safety procedures for purging and blow-down of pipeline and associated facilities followed by the Operations Personnel:

7.1.1 Purging in Emergency Situations

If an emergency situation occurs, Operations Personnel performs the following steps.

Step	Activity
1	**COORDINATE** directly with Area Management, Environmental Department and Liquid Control.
2	**REVIEW** any proposed plans with Area Management, Environmental Department and Liquid Control.
3	**CONFIRM** the approval and any changes immediately with Area Management, Environmental Department and Liquid Control

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7.1.2 Criteria for Identifying Blow-offs with Obstructions

The identification of blow-offs that are close to overhead or adjacent obstructions (for example, electrical lines, buildings) is necessary in order to take precautions and for providing safe conditions during blow down operations. .

To verify safety, the Operations Personnel uses the following steps.

NOTE: Crude oil and refined product pipelines will be dispersing into closed containment such as frac tanks, vac trucks or similar fixed equipment.

Step	Activity
1	**IDENTIFY** blow-off locations where precautions should be taken during a blow down.

7.1.3 Safety Notifications and Planning

Before vapors flare or vent to atmosphere, Operations Personnel verifies that the following notifications and planning occur, if applicable.

Step	Activity
1	At least 24 hours prior to beginning the purge, except in emergency situations, **NOTIFY** the appropriate personnel as follows: • State and federal regulatory agencies, if applicable • Company, state, and media relations representatives • County emergency control coordinators, which are located within a ten mile radius of the release site • State, police which have jurisdiction within a ten mile radius of the purge site • Residents located within close proximity to the flaring or venting site (minimum of 300 ft.). • Liquid Control and/or upstream and downstream pump station operators • Customers whose service is interrupted • Area Management • Environmental Department **PROVIDE** information concerning the possible release of vapors, potential for noise, location, time, and duration in the notification, if applicable.
2	**PLAN** for traffic control, if required, with local law enforcement officials performing all non-emergency activities. Some municipalities or highway departments may require written traffic control plans that are authorized by their staff.
3	**POST** warning sign(s) where appropriate.
4	**NOTIFY** other pipeline companies in the area.
5	**NOTIFY** Operations Management of any postponements.
6	For postponements, **NOTIFY** all previously notified county or state departments of the rescheduled date and time.

7.1.4 Safety Restrictions

Before flaring or venting vapors to atmosphere and during purging operations, the Operations Personnel verifies the following restrictions are enforced, as applicable.

Step	Activity
1	**USE** only **QUALIFIED** personnel to control pressure.
2	**BLOCK** or **DIVERT** traffic if vapors may "drift" across public roadways.
3	**KEEP ALL** vehicles at a safe distance and upwind from a blow-off or flare.
4	**PREVENT** a hazardous mixture of vapors and air in the pipeline.
5	**DO NOT VENT** vapors into overhead electrical wires at any time or into the atmosphere when an electrical storm is in the vicinity.

7.1.5 Additional Safety Procedures

Before flaring or venting vapors to atmosphere and during purging operations, the Operations Personnel performs the following safety procedures as applicable.

Step	Activity
1	**REQUIRE** personnel to wear proper Personal Protective Equipment. **REFER** to *Safety Procedure S-310 Personal Protective Equipment*.
2	**STATION** manned fire extinguishing equipment at strategic locations.
3	**ESTABLISH** communications with personnel diverting traffic and between personnel at the ends of pipeline sections being blown down or purged.
4	**LOCATE** personnel a safe distance upwind.
5	**LOCATE** vehicles or equipment which might cause ignition at a Safe distance and upwind from any vapor release.
6	**USE** silencers and odorant masking agents (if necessary) in populated areas when necessary. **CONSULT** Area Management.
7	**CONSULT** with Pipeline Operations Supervisor or Company Engineering to determine the required purge pressure, back pressure, time interval and how pigs may be used to assist in purging activities.
8	For pipelines containing liquids, **VENT** vapors and liquids to a separator or "Frac tank" to comply with environmental guidelines.
9	When using high pressure hoses to connect to temporary facilities (a separator or Frac tank), **LIMIT** the velocity of the fluids to a Safe limit in the hoses.

NOTE: Check the condition of hose(s) and couplings prior to use, and occasionally during use. Replace if required.

7.2 Purging with Product

The procedures in this section describe how to purge with product and are followed by Operations Personnel:

7.2.1 Develop Purge Plan

Before purging, Operations Personnel develop a detailed work-plan using the following steps as applicable.

Step	Activity
1	**DEVELOP** a purge work-plan as part of the shutdown procedure for review and approval by company. **REFER** to *SOP HLI.01 HL Pipeline Shutdown and Startup*.
2	**BASE** this work-plan on the schematics of the area. **INCLUDE** the proposed valves to be operated and the sequence of events to be followed.

Step	Activity
3	**INCLUDE** the following in preparing the purge work-plan: • Direction of the purge and the inlet purge pressure • Length of pipe to be purged • Nominal diameter of the pipeline • Valve numbers on the blow-off piping • Valve body and blow-off size • Valve types (plug or other) • Composition of product • Displacement rate • Availability of a combustible gas indicator capable of reading 100% or appropriate instrument to monitor LEL. • Use of a noise silencer, flare, or diffuser tanks • Number and types of pigs to be used
4	**SEND** this plan to the Operations Manager for prior approval.
5	**VERIFY** that the plan includes all safety measures needed to safely purge and pressurize the facilities including warning signs, notification of personnel and lockout/tagout. **REFER** to *SOP HLB.06 Hazardous Energy Control (Lockout Tagout)*
6	**VERIFY** that the plan for returning to service includes information regarding removal of warning signs or tags that were placed prior to the start of the purge. **REFER** to the other sections of this document for further specific preparation considerations.
7	**CONTACT** Liquid Control and Environmental Department to **REVIEW** the purge plan.

CAUTION: Do not begin the purge until:
- A Purging meeting has been completed. See Section 7.2.3
- Liquid Control has confirmed receipt of the plan.

7.2.2 Purging Plan for Short Pipe Sections

For purging short sections of pipe, including plant piping, Operations Personnel uses the following steps.

Step	Activity
1	**USE** the steps in Section 7.2.1 to develop a purging plan for each section to be purged.
2	As the section to be purged becomes more complex, **MAKE** the plan more comprehensive as necessary.
3	If technical assistance is needed for a particular purging situation, **CONTACT** the Operations Manager or Company Engineering.

7.2.3 Purging Meeting

Operations Personnel conduct a meeting before purging is started with personnel who are involved in the purging activity. In the purging meeting, include at least the following in the discussion of purging operations.

Step	Activity
1	**INCLUDE**: • Flaring and venting and purging safety in accordance with Section 7.1. • The location of each person involved in the purging operation, along with their specific duty and responsibility during the purge. • The description, use, and location for each piece of work equipment. • Measurement departments input regarding product quantities and measurement methods.
2	Using a schematic of the piping involved, **SHOW** and **EXPLAIN** the following: • Flow of the purge product • Locations where the purge product enters and leaves the system • Location of fire extinguishers • Location of key personnel and equipment • The purge product pressure • The length of time required to purge the system or the method to be used to check the air/ product mixture concentration • Consider the presence of special conditions, such as blind legs or dead legs • Any other safety related items, such as the use of personal protective equipment. • Sequence of valve operations

7.2.4 Beginning a Pipeline Purge

To begin a pipeline purge, Operations Personnel uses the following general steps. Follow the work-plan specifically authored for a project, if applicable.

Step	Activity
1	**VERIFY** that the necessary equipment is on site prior to beginning the purge.
2	**CONTACT** Liquid Control and **REVIEW** the purge plan. **DO NOT BEGIN** the purge until: • A Purging meeting has been completed. See Section 7.2.3 • Liquid Control has confirmed receipt of the procedure and understand the scope of work.
3	**OPEN** the flare or vent at the downstream end of the purge. Maintain planned specified back pressure.
4	Use the appropriate test equipment to **MONITOR** for released vapors.
5	**OPEN** the designated inlet (purge control) valve the appropriate amount to achieve the inlet purge pressure.
6	After the purge pressure is established, **BEGIN** purge timing.
7	**MONITOR** the inlet purge pressure for the specified purge duration.

7.2.5 Monitoring the Purge

To monitor the purge, Operations Personnel uses the following steps.

Step	Activity
1	**MONITOR** the purge pressure continuously
2	**CONTINUE** purge until 100% product is detected.
3	**CLOSE** the downstream blow-off valve and return the pipeline to service when the purge is complete.

7.2.6 Purging of Station and Other Facilities

To purge stations and other facilities with product, Operations Personnel uses the following steps.

Step	Activity
1	**PURGE** stations in accordance with each station's equipment-specific plan.
2	**DEVELOP** individual purging plan for purging pump station piping, Meter station piping, scrubber, pig traps, etc.
3	If technical assistance is needed for a particular purging situation, **CONTACT** the Operations Manager or company Engineering.

7.2.7 Reporting

To meet reporting requirements when purging with product, Operations Personnel uses the following steps.

Step	Activity
1	For purging with product. **COMPLETE** the applicable form(s) for *Purge Report*.
2	**REPORT** to Liquid Control the time each valve is checked, whether it was closed or open, and the time the purge begins and ends in accordance with the written procedures. Area Management is responsible for this action item.

7.3 Purging with Nitrogen

By purging with nitrogen, the possibility of a hazardous mixture of vapor and air is avoided, and the pipeline section is cut as often as required. To purge with nitrogen, the Operations Personnel uses the following sub procedures, if applicable.

Step	Task
1	**DETERMINE** if a nitrogen purge is to be used.
2	**PREPARE** a purge procedure as described in *SOP HLI.01 HL Pipeline Shutdown and Startup*.

7.3.1 Preparation

When preparing to purge with nitrogen, the Operations Manager uses the following steps:

Step	Activity
1	**DECIDE** whether to use a pig. **USE** a polypig where possible.
2	Prior to running the nitrogen purge, **USE** weld caps, blinds, or bull plugs to **DISCONNECT** and physically **ISOLATE** pipeline sections to be nitrogen purged from any connections that present a potential product source.
3	**VERIFY** that: • All personnel are aware of the dangers associated with nitrogen. • Only personnel directly involved in the nitrogen purge are near the pipeline or the nitrogen source.

NOTE:
- A bidirectional polypig can be used for purging, filling, and dewatering.
- In certain situations performing the nitrogen purge without the use of pigs may be necessary.

7.3.2 Equipment Installation

To install equipment to perform a nitrogen purge, Operations Personnel use the following steps.

Step	Activity
1	Prior to the nitrogen purge, **INSTALL** the following as necessary on sections where pigs are used for the nitrogen purge: • Isolation caps • Launcher and receiver • Stopples • Blinds

7.3.3 Performing the Nitrogen Purge

Operations Personnel perform the nitrogen purge using the following general steps. Follow the work-plan specifically authored for a project, if applicable:

Step	Activity
1	Is nitrogen purge using pigs? If no, proceed to step 2. If yes: • **PERFORM** the purge by running a polypig, two-way pig, or other acceptable pig through the section with nitrogen. • **RUN** additional pigs as necessary for purging. • **WAIT** for the final pig to be received, and then **CONTINUE** the injection of nitrogen until purge is complete.
2	**PERFORM** the nitrogen purge by: • **INJECTING** nitrogen in a blow-off on one end of the purge section. • **FLARING OR VENTING** the vapor-nitrogen mixture through a blow-off on the other end of the section. If liquids are anticipated, flow through a frac tank, vac truck, or similar fixed equipment.
3	**VERIFY** adequate volumes of nitrogen are available for the purge.

Step	Activity
4	**REFER** to *Table 1: Determine Displacement Volume* for the approximate displacement volume needed per mile for various diameters of pipe at an average pigging pressure. May need to calculate displacement volume for more complex purges.

Table 1 Determining Displacement Volume

Pipe Size (Inches)	Displacement Volume (BBLS/Mile)
42	49
36	36
30	25
26	19
24	16
20	11
18	9
16	7
14	5
12	4

NOTE: Operations Personnel maintain communication with Area Management, providing details concerning displacement amounts.

7.3.4 Reporting

When purging with nitrogen, Operations Personnel follow the reporting below.

Step	Activity
1	**COMPLETE** the applicable form(s) for *Purge Report* each time a line is purged. The Measurement Technician or person designated by the Area Management **FILLS** out the report.

8.0 Documentation Requirements

Record data in electronic database or utilize the following form(s) as applicable:

- B.03.A Purge Report

9.0 References

HLB.06 Hazardous Energy Control (Lockout Tagout)
HLI.01 HL Pipeline Shutdown and Startup
S-310 Personal Protective Equipment

Appendix A: OQ Task Requirements

The table below identifies the Operator Qualification (OQ) task requirements.

Task Description	OQ Task
Purge a Pipeline	PLOQ812

ENERGY TRANSFER

Pipe Location and Marking

Standard Operating Procedures

Applicable to Hazardous Liquids Pipelines and Related Facilities

Code Reference :	**Procedure No.: HLB.04**	
49 CFR: 195.442	***Effective Date: 04/01/18***	**Page 1 of 5**

1.0 Procedure Description

This Standard Operating Procedure (SOP) describes how to locate and mark company underground facilities using pipe locators. Correct use of pipe locators is required to detect and accurately locate below ground company facilities.

2.0 Scope

In order to prevent damage to company facilities, the company participates in One-Call Programs and reacts proactively to One-Call Notifications for their pipelines. In addition, the company patrols its pipelines in order to identify and interact with individuals who fail to make one-calls.

This SOP describes the actual locating and marking function, using electronic pipeline locators. The process includes confirming proper procedure for various makes and models of pipe locators by referring to manufacturer documentation. It is a companion to *SOP HLI.10 Excavation and Backfill, SOP HLI.28 Right-of-Way Encroachments, SOP HLI.30 Mechanical Damage,* and *SOP HLI.31 One-Call System Response,* which primarily deal with processes required before and after the locating and marking function.

3.0 Applicability

This SOP applies to segments of pipeline when using locators to provide the physical location of pipeline and estimate of the burial depth when:

An outside company (third party) intends to excavate on the company's right-of-way

The company (first party or second party) installs new connections, repairs pipe, monitors pipeline, or installs test leads on its own facilities

4.0 Frequency

As required: Locate underground facilities using pipe locators

5.0 Governance

The following table describes the responsibility, accountability, and authority of the operations described in this SOP.

Function	Responsibility	Accountability	Authority
All Operations	Operations Personnel	Operations Personnel	Operations Manager

6.0 Terms and Definitions

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *SOP HLA.01 Glossary and Acronyms*.

Terms	Definitions
Active/Conductive Mode	A direct connection is provided from the transmitter to the company pipeline facility to apply a locate signal to company pipeline facilities. This method provides the strongest signal, is less likely to "bleed over" to adjacent company facilities, and allows a greater range of frequency and power output options.
American Public Works Association (APWA) color coding	**WHITE** - Proposed Excavation **PINK** - Temporary Survey Markings **RED** - Electric Power Lines, Cables, Conduit and Lighting Cables **YELLOW** - Gas, Oil, Steam, Petroleum or Gaseous Materials **ORANGE** - Communication, Alarm or Signal Lines, Cables or Conduit **BLUE** - Potable Water **GREEN** - Sewers and Drain Lines **PURPLE** - Reclaimed Water, Irrigation and Slurry Lines
Electromagnetic Locators	Instruments used for detecting and accurately locating company pipeline facilities consisting of two principle component parts: a directional radio type transmitter and a directional radio type receiver. Electromagnetic locators can operate in two modes: active/conductive and passive/inductive.
Passive/Inductive Mode	An induction clamp (coupler) is used to apply a locate signal onto a company pipeline facility. This method limits the choices of frequency and power outputs more than a direct connection and can result in "bleed over" to any conductor in the area.
White Lining	An excavator's designation on the ground of the area to be excavated using white paint, white flags, white stakes, or any combination of these.

7.0 Pipe Location and Marking

The following procedures are described in this section:

- Line Marking

CAUTION: New Jersey Damage Prevention rules require notification for any ground movement or excavation greater than 6" in depth.

7.1 Line Marking

Operations Personnel follow these steps to properly mark the pipeline:

Step	Activity
1	**MARK** the approximate location of underground facilities or communicate with the excavator within 48 hours of the given notice to excavate or a time agreed to by the operator and excavator.
2	**PROVIDE** a qualified company representative to field locate and stake company pipeline facilities whenever directed (e.g., *SOP HLI.31 One-Call System Response* or other activity on the pipeline).
3	**USE** maps and/or drawings to identify the general location of expected company pipeline facilities, and possible foreign line crossings within the area being marked, prior to using an electromagnetic locator.

NOTE: Forward proposed revisions/corrections (e.g., survey centerline GPS data, offset distances) to the GIS Department if it is determined after field locating and marking company pipeline facilities updates are required to company maps and/or drawings. Keep a revised copy until the revisions/corrections are received, verified, approved and posted.

4	**REVIEW** individual manufacturer's electromagnetic locator procedures for proper operation and optimal settings to locate and accurately mark underground company pipeline facilities.

NOTE: It is good practice to use the lowest frequency possible at the lowest power output possible to complete locating and marking.

5	**PROVIDE** a direct connection between the transmitter and the company pipeline facility and **OPERATE** the electromagnetic locator in conductive mode whenever possible

NOTE: Conductive mode is the preferred method of operation.

WARNING: Take caution of possible induced A/C or fault currents on company pipeline facilities when connecting electromagnetic locators in conductive mode.

6	**OPERATE** the electromagnetic locator in inductive mode when a direct connection is not possible.

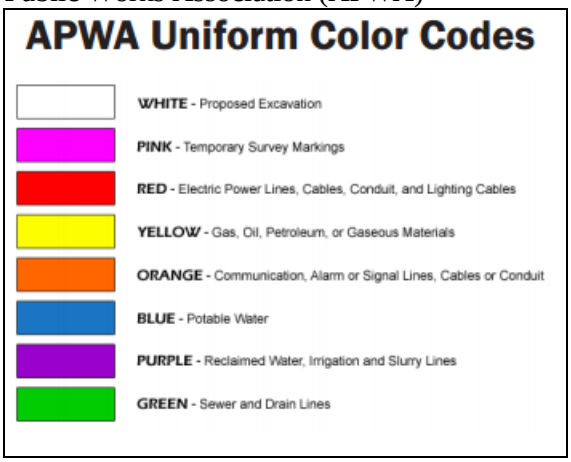
CAUTION: The actual accuracy of electromagnetic pipe locators may vary depending on depth of company facilities, coating type, soil conditions, interference, and type of locators. Never indicate accuracy in the field to be better than ±24 inches of the marked location without probing.

7	**VERIFY** the electromagnetic locator is operating properly by determining actual depth and physical locations of company pipeline facilities with periodic probing before allowing any encroachment/activities within or near company right-of-way. **CONSIDER** using cathodic protection readings off of a probe bar to verify contact with company pipeline facilities.

NOTE: In cases where electromagnetic locators cannot locate company pipeline facilities consider radar-based methods such as ground penetrating radar and associated technologies to determine the location of company pipeline facilities. It is important to note that these technologies are not applicable in all areas or conditions, because conductive soils and materials obscure radar signals.

8	**MARK** the approximate location of underground company pipeline facilities using American Public Works Association (APWA) color coding by means of stakes, paint, flags, or a combination thereof.

NOTE: American Public Works Association (APWA)



Step	Activity
9	**VERIFY** the viability of temporary pipeline markings for 14 days and refresh as required.
10	When required, **INDICATE** the nominal diameter of pipelines greater than 6 inches at every other mark.

Step	Activity
11	**VERIFY** the distance between marks clearly define the route and changes in direction of underground pipeline and or comply with state requirements. Clearly **INDICATE** lateral connections at the point where the change in direction or connection occurs.
12	**EXTEND** markings a reasonable distance beyond the bounds of the area requesting to be located.
13	**COMPLETE** appropriate documentation requirements per *SOP HLI.31 One –Call System Response*

CAUTION: Determine depth and actual location with the pipe locator or other suitable means (such as a probe bar) before allowing mechanical equipment to dig over the facility to avoid mechanical damage to the pipeline. See *SOP HLI.10 Excavation and Backfill*.

8.0 Reporting Requirements

Record data in electronic One-Call Program database

9.0 Related Documents

HLI.10 Excavation and Backfill
HLI.28 Right of Way Encroachments
HLI.30 Third Party Damage
HLI.31 One-Call System Response

Appendix A: OQ Task Requirements

The table below identifies the Operator Qualification (OQ) task requirements.

Task Description	OQ Task
Underground Pipeline-locate and temporarily mark	PLOQ605

ENERGY TRANSFER

Initial Reporting and Investigating Events

Standard Operating Procedures

Applicable to Hazardous Liquids Pipelines and Related Facilities

Code Reference :	**Procedure No.: HLA.04**	
49 CFR 193, 195.50; 29 CFR 1910	***Effective Date: 05/01/18***	**Page 1 of 11**

1.0 Procedure Description

This Standard Operating Procedure (SOP) establishes a process for observing, reporting and investigating events that involve, or have the potential to involve, loss to people, property or process.

2.0 Scope

This SOP provides guidance for employees that observe, report or investigate Events. This document does not supersede or replace other applicable regulatory requirements. Events require different responses depending on the potential impacts and disciplines involved (safety, asset reliability, environmental, pipeline integrity, measurement/quality, etc.) and classification (Class 1, 2, or 3 as defined in this document).

3.0 Applicability

This SOP is applicable to employees in Field Operations, Gas / Liquids Control, and Engineering and Construction (E&C) projects who may observe, report, or investigate the following:

- Events impacting the health or safety of the public, employees, or contractors.
- Environmental releases or spills.
- Events at company Processing and LNG facilities; pipeline, compression, measurement, or communications facilities.
- Events related to Engineering and Construction projects, including contractors.

4.0 Frequency

As needed: Observe, report, and investigate all significant work-related events, and high-potential near misses (hits).

5.0 Governance

The following table describes the responsibility, accountability, and authority of the activities described in this SOP.

Function	Responsibility	Accountability	Authority
Process Administration	All Employees	Directors	Vice Presidents

6.0 Terms and Definitions

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *SOP HLA.01 Glossary and Acronyms*.

Terms	Definitions
Affiliate	Any asset operated by Energy Transfer.

Terms	**Definitions**
Operations Equipment Reliability Event	Events involving processing, pumping equipment and associated "plant" or "station" equipment.
Charter	Defines the scope and designates a team to perform an investigation of Class 3 events, including investigations that may be requested by counsel.
Confirmed Discovery	When it can be reasonably determined, based on information available to the operator at the time, that a reportable event has occurred, even if only based on a preliminary evaluation.
Engineering and Construction Event	An Event involving Engineering and Construction projects or personnel.
Discipline Director	The Director for a certain discipline (Pipeline Integrity, Regulatory Compliance, Operations, Measurement/Quality, Environmental, Safety, Engineering, etc.).
Discipline Specialist - Subject Matter Expert	The subject matter expert (SME) for a certain discipline (i.e. Pipeline, Mechanical, Controls, Safety, Environmental, etc.).
Environmental Event	Events involving spills or releases including reportable H2S releases, see *Environmental Manual - Reporting Spills and Releases,* or as directed by the Environmental Department.
Event Classification	The classification of an Event is based upon the level of potential or actual consequences. The ranking will be designated numerically, with "1" representing the least serious and "3" representing the most serious. • **Class 1**: These Events maybe reported in Everbridge as "Level 1 Local" events and reported at least through the Operations Vice President level. Class 1 Events involve: o First aid injury or high-potential near miss. o Company property damage or environmental release involving remediation estimated to cost less than $10,000. o Vehicle Events involving an employee that does not result in Class 2 or 3 consequences. o High potential near miss events with potential to generate Class 1, 2, or 3 consequences. • **Class 2**: These Events maybe reported in Everbridge as "Level 1 Local" events and reported at least through the Operations Vice President level. Class 2 Events involve: o OSHA recordable injury to an employee or third party. o Company or third party property damage/loss or environmental release involving remediation estimated to cost in excess of $10,000, but less than $50,000. o Significant Leaks, fires or failures which are immediately controlled, contained, or extinguished, but have the potential to generate Class 2 consequences (> $10,000).

Terms	**Definitions**
	o Spills and releases (including air emissions) that exceed thresholds defined in Environmental Manual - Reporting Spills and Releases. • **Class 3**: These Events should be reported in Everbridge as "Level 2 Corporate" events, and will be reported through the Executive Vice President level. Class 3 Events involve: o Employee or third party fatalities or lost time injuries resulting in overnight hospitalization. o Significant events that are reportable to regulatory agencies. o Significant events requiring notification to law enforcement, emergency response agency or a public safety official and/or having offsite impacts which have the potential to generate significant media attention (proximity to metropolitan areas, evacuation of buildings, traffic diversions, etc.). o Company or third party property damage/loss or environmental release which requires remediation estimated to exceed $50,000. o Significant leaks, failures or fires, which cannot be immediately controlled, contained, or extinguished.
Events - All inclusive	Occurrences which cause injury to the public, employees or the contractors, as well as damage to company property or third party property, are reportable. These include injury events, property or product losses, process interruptions, service interruptions or environmental releases. The following list of events must be reported: • Fires, ruptures, explosions, significant leaks, or other occurrences resulting in property damage. • Injuries to the general public, employees or contractors requiring hospitalization. • Any occurrence resulting in a release of hydrocarbons or other materials into the air, land, or water that must be reported to any regulatory authority. • Any occurrence resulting in media attention, or which might draw media attention. • Any of the above resulting in damage to property owned by third parties. Any vehicle event resulting in bodily injury to employees, contractors, or the public or damage (bending, crushing, or breaking) to a company or third party vehicle.
Measurement / Product Quality Event	An Event that has Measurement or Quality implications.

Terms	**Definitions**
High-potential Near Miss Event	A "close call" or occurrence that had the potential to result in injury to person, damage to equipment, or interruption to process, but did not result in such consequences.
Initial Event Report	Verbal – Immediate telephonic notification to a person (not an answering machine, text, or email) that an Event has occurred.
Investigation	A detailed inquiry and review of facts related to an Event; conducted for the purpose of determining the potential cause(s) and developing remedial measures to prevent recurrence.
Investigation Report	Report to be completed at the conclusion of an investigation. May be an entry in the IMS/Intelex application, or a formal written report attached in IMS/Intelex.
Management	Vice President or higher officer of the company involved in the Event, or their designee.
Near Hit	Activity or encroachment on the Rights-of-Way that is not authorized.
Pipeline Accident (PHMSA)	Each failure in a pipeline system subject to 49 CFR Part 195 in which there is a release of the hazardous liquid or carbon dioxide transported resulting in any of the following: (a) Explosion or fire not intentionally set by the operator. (b) Release of 5 gallons (19 liters) or more of hazard liquid or carbon dioxide, unless the release is less than 5 barrels (0.8cubic meters) resulting from a pipeline maintenance activity if the release: (1) Is not otherwise reportable under this section; (2) Did not result in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines; (3) Is confined to company property or pipeline right-of way; and (4) Cleaned up promptly; (c) Death of any person; (d) Personal injury necessitating hospitalization; (e) Estimated property damage, including cost of clean-up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding $50,000. These events are reportable to PHMSA and handled by the Regulatory Compliance Department
Pipeline Accident requiring Immediate Notice	Any failure that:

Terms	**Definitions**
	(1) Caused a death or a personal injury requiring hospitalization; (2) Resulted in either a fire or explosion not intentionally set by the operator; (3) Caused estimated property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding $50,000; (4) Resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines; or (5) In the judgment of the operator was significant even though it did not meet the criteria of any other paragraph of this section.
Safety Event	An Event that involves the health and safety of an employee, third party or a vehicle incident. Refer to *Safety Procedure S-010 – Incident Management*, or as directed by the Safety Department.
Safety Related Condition (SRC)	An Event that involves one or more of the following: pipe wall thickness reduction, unintended movement or loading of facilities, cracks, material defects, leaks, has the potential to lead to an imminent hazard or pressures above the setting of secondary or overpressure protection devices installed to protect the pipeline. Immediate remedial action is required.

7.0 Initial Reporting and Investigating Events

The following procedures are described in this section.

- Process Administration
- Observing an Event
- Reporting and Event
- Investigating an Event
- Investigation Report
- Tracking Investigation Action Items

7.1 Process Administration

The Event reporting and investigation process is administered by the Department Vice Presidents and Discipline Directors. This process promotes consistent and comprehensive reporting and investigation of Events.

Step	Activity
1	**REPORT** and **INVESTIGATE** Events following this SOP.
2	**MAINTAIN** confidentiality of all notes, records, drawings, photographs, videotapes, reports, and physical evidence.
3	Immediately **REFER** third-party requests for information concerning Events or investigations to the Legal Department.
4	**DOCUMENT** the Event through the initial report entered in IMS/Intelex.

NOTE: Entry into IMS/Intelex is required for events meeting the criteria for Categories 1 through 3.

Step	Activity
5	**COMPLETE** verbal reports as soon as an Event is known.
6	**COMPLETE** initial reports into IMS/Intelex as soon as possible following the Event.
7	For all Events that represent a learning opportunity, **INCLUDE** a completion of the analysis of potential causal factors and associated action items as part of the IMS/Intelex entry after the investigation has been completed.
8	**COMPLETE** reports as required by regulatory agencies.

7.2 Observing Events

Company personnel follow this procedure when they observe or become aware of an event.

Step	Activity
1	**GATHER** information necessary to make the initial Event assessment. Immediately **INITIATE** internal notification procedures.
2	**ASSESS** the general condition of the Event scene. **VERIFY** that the site is secured. **CONSIDER** all People, Equipment, Materials, and Environmental factors in verifying that the site is secure.
3	If appropriate, **VERIFY** the preservation of any physical evidence, and **COLLECT** names, addresses, and telephone numbers of witnesses.

NOTE: Company personnel, perform the procedures in *the ETC Corporate Emergency Management Plan* and *SOP HLA.08 Field Emergency Response Procedures* to respond to Events with various or multiple consequences.

7.3 Reporting Events

Timely reporting is critical in initiating a proper response to an emergency situation and minimizing adverse consequences. Failure to report an event in a timely manner may adversely impact public safety, aggravate losses, jeopardize potential insurance coverage, and subject the company to adverse publicity.

Use the following steps for reporting Events.

NOTE: A mass communication system will be utilized by the Gas / Liquid control Group to notify appropriate response personnel based on the actual or potential consequences of the event. There are two (2) levels of response groups maintained in the system; local/area and corporate support. Periodic testing should be conducted for each level to verify appropriate individuals are maintained in each group. This can be accomplished during annual exercises.

NOTE: Per Pipeline and Hazardous Material Safety Administration's (PHMSA) advisory bulletin (PHMSA-2012-0201); pipeline operators should immediately and directly notify the Public Safety Access Point (local emergency responders) that serves the communities in which their pipelines are located when there are indications of a pipeline facility emergency. This notification is to alert the local responders regarding a potential emergency, or to see if the local emergency responders can assist the operator in confirming that an emergency has occurred.

Pipeline facility operators should ensure the call to the appropriate PSAP is made promptly, and to as many jurisdictions as is necessary. A direct-inbound ten digit number must be used for the specific PSAP, since a call to 9–1–1would be routed only to the PSAP for the caller's location.

NOTE: Louisiana requirement – Title 43 § XI Office of Conservation – Pipeline Division (LA Administrative Code)

IMMEDIATE Notification to LA State Police of any release that presents a potential hazard to human health, environment or property.

Step	Activity
1	**IMMEDIATELY REPORT** all events that may impact the public to the appropriate local emergency response agency(s).
2	**IMMEDIATELY REPORT** all Class 1, 2, and 3 Events to the Operations Manager, and Discipline Director (or designee). For Class 2 and 3 Events that involve leaks, failures or fires, also notify the appropriate Liquids Control group.
3	**IMMEDIATELY REPORT** all Pipeline Accidents as defined above. This immediate notification by phone must be made to one of the following: • Director – Regulatory Compliance • Director - Interstate Regulatory Compliance • Manager – Intrastate Regulatory Compliance • Director – Safety/Security/Emergency Mgt • Manager – Emergency Response

Step	Activity
	Any one of the five will suffice for immediate notification of Pipeline Accidents as defined by PHMSA. This notification must be immediate because one of these individuals, or their staff will make required notification to the National Response Center and/or appropriate State Agency within 1 hour of confirmed discovery.
4	Director of Regulatory Compliance or designee, must be notified if there is a revision or confirmation of the information in the initial notification within 48 hours of the confirmed discovery of the accident.
5	**INCLUDE** the following information in the initial report: • The fact that an Event has occurred • Who was involved • What occurred • What extent of personal injury or property damage • When and where it occurred • What equipment is believed to be involved If there is any media involvement
6	For Class 3 Events, the Liquids Control group **NOTIFIES** the following departments via a Corporate Level notification call using the Everbridge "mass communication system". • Operations Support (Regulatory Compliance) • Technical Services • Safety • Environmental • Liquids Control Management • Sr Operations Executives • Legal • Media Relations • Investor Relations • Right-of-Way (if applicable) The Safety Director or other Management Representative **INITIATES** the Corporate Emergency Management Plan, if required, and **VERIFIES** that the appropriate notifications are made.
7	**NOTIFY** the local Safety Representative of each safety event, the local Regulatory Representative of each pipeline incident and the Environmental Representative of each environmental event.

NOTE: The Division or Department VP develops and distributes a local procedure with contact numbers for reporting emergency Events meeting the intent of this SOP. Refer to *SOP HLA.08 Field Emergency Response Procedures.*

7.4 Investigating Events

Users of IMS/Intelex may use that application to process the data collected during an investigation. Where IMS/Intelex is not used, the Operations VP may designate an alternative method for recording and analyzing data collected.

The investigator(s) will follow the procedure below to investigate an Event. The TapRoot Investigation methodology, or other similar methodology may be used for Event investigations.

NOTE:
For pipeline related Events, **REFER** to the following SOPs or Manual:

- *SOP HL A.11 Investigation of Failures*
- *SOP HLA.12 Safety Related Condition*
- *SOP HLA.13 Recognizing and Reacting to Abnormal Operations*

Step	Activity
1	**RESPOND** in a timely and objective manner.
2	**COLLECT** relevant information.
3	**DETERMINE** the causal factors and root cause(s), if possible.
4	**DOCUMENT** conclusions and supporting facts.
5	**PROVIDE** recommendations/action items for potential prevention of similar events.

7.4.1 Class 1 and 2 Investigations

Operations/Department Managers or Subject Matter Experts (SMEs) follow this procedure for Class 1 and 2 investigations.

Step	Activity
1	**COMPLETE** required investigations as soon as possible following the Event.
2	For events involving company employees or property, **COMPLETE** an analysis of potential causal factors. **DEVELOP** and **ASSIGN** action items as appropriate.

7.4.2 Class 3 Investigations and Charter Development

The Department Vice President and / or Safety Director (designee) follows this procedure for Class 3 investigations.

Step	Activity
1	**CONSULT** the Legal Department upon notification of Class 3 Events.
2	**DEVELOP** the scope of the investigation, **SELECT** team members, and **DESIGNATE** a team leader.

NOTE: The Investigation team leader and most investigation team members should not be directly involved in the Event. Members chosen from the facility involved should not have immediate supervision responsibilities for anyone directly involved in the Event.

Step	Activity
3	**MAKE** diligent efforts to complete the report within 30 days of the Event.
4	**CONSIDER** forming joint investigation teams in the following situations: • If a contractor is involved in the Event • If a regulatory agency intends to perform an investigation • If a joint investigation is required by regulatory agencies

7.5 Written Investigation Report

The following guidelines are used to prepare the Written Investigative Report

Step	Activity
1	Following the investigative and analytical work, and **PREPARE** a report for Class 2 and 3 Events containing the following information: • Executive summary • Chronology of events, supported by: o Interview summaries o Photographs, videos, drawings, and sketches o Analytical material o Inventory of associated physical evidence o Inventory of supporting documentation • Contributing factors and root cause analysis • Conclusions and supporting facts • Investigation methods used and supporting material • Recommendations and action items, if appropriate • Safety alerts or High Value Learning Event (HVLE)
2	**SUBMIT** all investigation reports to discipline director for review.

NOTE: Entry into IMS/Intelex may suffice for some Class 2 and 3 Incidents.

7.6 Tracking Investigation Action Items

With direction from the Management, company personnel document and track action items associated with an investigation.

Step	Activity
1	**ASSIGN** action item responsibilities.
2	**PRIORITIZE** action items.
3	**SET** due dates for completion.
4	**MONITOR** the status of action items
5	**MANAGE** outstanding items in a timely manner.
6	**VERIFY** and **DOCUMENT** action items are completed.

8.0 Documentation Requirements

Record data in electronic database or utilize the following forms as applicable:

- IMS/Intelex or other discipline specific documentation systems.

9.0 References

HLA.08 Field Emergency Response Procedures
HLA.11 Investigation of Failures
HLA.12 Safety Related Condition
HLA.13 Recognizing and Reacting to Abnormal Operations
Safety Procedure S-010 Incident Management

Appendix A: OQ Task Requirements

There are no Operator Qualification (OQ) tasks required for this SOP.

ENERGY TRANSFER

Field Emergency Response Procedures

Standard Operating Procedures

Applicable to Hazardous Liquids Pipelines and Related Facilities

Code Reference:	**Procedure No.: HLA.08**	
49 CFR: 195.408	***Effective Date: 11/01/15***	**Page 1 of 19**

1.0 Procedure Description

This Standard Operating Procedure (SOP) provides instruction and guidance to field employees when preparing for and responding to an emergency event. All employees subject to involvement in an emergency response will be trained on the information and procedures contained herein.

2.0 Scope

This SOP establishes pre-planned response activities to be used in the event of a facility incident, failure or other emergency. The response activities included in this procedure align with those required by regulation. These procedures apply to all regulated pipeline facilities. An effective response to an emergency should accomplish the following:

- Provide for incoming notification, confirmation and classification of the emergency situation
- Provide for the contact and mobilization of company and third party resources required to respond to the emergency and/or restoration activities
- Provide for emergency shutdown, pressure reduction and/or isolation as applicable to the scenario and as needed to make the conditions safe
- Establish and maintain communications with company personnel and local emergency responders, law enforcement and public officials
- Provide for coordination and resource planning with local emergency responders
- Provide for the safety of the public and company personnel above all other considerations
- Provide for the protection of public and company property to the extent possible
- Monitor the released HVLs and take actions to minimize the impact including possible intentional ignition when necessary.
- Provide preparedness and response procedures for typical emergency scenarios
- Provide for safe restoration of facilities and services
- Provide for investigation of failures
- Provide for training and review of emergency response activities
- Provide for continued liaison activities with emergency responders, local law enforcement, and public officials

The procedures in this SOP either directly or by reference accomplish the above objectives.

3.0 Applicability

This SOP applies to all regulated pipeline facilities and related employees that are required to respond to an emergency.

4.0 Frequency

As needed: Response Activities
Annually: Training

5.0 Governance

The following table describes the responsibility, accountability, and authority for the activities described in this SOP.

Function	Responsibility	Accountability	Authority
Area Emergency Response Plan Development	Operations Personnel	Operations Manager	Director of Operations
Initial Notification of Emergency	Liquid Control / Operations Personnel	Operations Manager	Director of Operations
Confirmation and Classification of the Emergency	Operations Personnel	Operations Manager	Director of Operations
Responding to and Notification of Emergencies	Operations Personnel	Operations Manager	Director of Operations
Security	Operations Personnel	Operations Manager	Director of Operations
Media Response	Operations Manager / Media Relations	Operations Manager	Sr. VP of Operations or Designee
Post Emergency Response Operations	Operations Personnel	Operations Manager	Director of Operations
Emergency Response Review	Operations Personnel	Operations Manager	Director of Operations
Training	Operations Personnel	Operations Manager	Director of Operations
Liaison with Community Response Agencies and Utilities	Operations Personnel	Operations Manager	Director of Operations

6.0 Terms and Definitions

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *SOP HLA.01 Glossary and Acronyms*.

Terms	**Definitions**
Emergency	Any situation demanding immediate corrective action, which may involve company facilities or operations, endangerment of human life, company and public property damage and which may affect normal service to customers. Emergencies may result from numerous events, including but not limited to the following: • Leaking liquids near or involving a pipeline or pipeline facility • Fire located near or directly involving a pipeline or pipeline facility • An explosion near or directly involving a pipeline or pipeline facility • Substantial service interruptions to a pipeline or pipeline facility • Release or spill of a hazardous substance causing, or likely to cause, an environmental impact • Potential pipeline events such as those listed above due to natural disasters such as: o Wind storms o Hail o Flooding o Tornado o Hurricane o Wildfire o Earth movement (landslides, earthquake, subsidence, etc.) • Civil disturbances or other acts affecting physical security that could disrupt operations (such as vandalism, arson, bomb threats, kidnapping, biological threats, public confrontations or riots) • Any unusual situation whereby human life or significant property is endangered
Incident	Reference to *SOP HLA.15 PHMSA – States - Incident Reporting* for definition and classification of incidents
IAP	Incident Action Plan
ICS	Incident Command System
PED	Personal Electronic Device includes cell phones, ipods, MP3 Players, pagers, cameras, etc.
PERO	Post Emergency Response Operation
PPE	Personal Protection Equipment
OCC	Operation Communication Center

CAUTION: The use of Personal Electronic Devices (PEDs) by pipeline employees who are performing operations & maintenance activities may increase safety risks by becoming distracted. Such distractions may also hinder prompt recognition and reaction to abnormal operating conditions and emergencies.

While the Company is not discouraging the use of PED's as a part of normal business communications, it recognizes the increased risks associated with the use of PED's by individuals performing activities that affect pipeline operation or integrity. Pipeline operations & maintenance tasks require a critical level of attention and skill, which may be compromised by visual, manual and cognitive distractions caused by the use of PED's.

The use of PEDs is discouraged while working in or around a hazardous atmosphere. Most PEDs are not intrinsically safe and could potentially be an ignition source.

7.0 Field Emergency Response Procedures

This procedure contains the following sections:

- Area emergency response plan
- Initial notification of emergency
- Confirmation and classification of the emergency
- Responding to and notification of emergencies
- Controlling released vapors
- Security
- Media response
- Post emergency response operation
- Emergency response review
- Training
- Liaison with community response agencies and utilities

7.1 Area Emergency Response Plan

Develop an Area Emergency Response Plan (Plan) in accordance with *SOP HLA.19 Area Emergency Response Plan Development and Maintenance* This plan will supplement the procedures provided herein and provide detailed information relative to the Area including company and external contact information, resource-planning information, and Area specific procedures as may be required. The Plan and updates to the Plan shall be provided to all Operations Managers, Directors of Operations and other designated employees responsible for carrying out emergency response activities.

7.2 Initial Notification of Emergency

Perform the following activities during the initial notification of a system emergency. These activities will be performed by whoever receives the initial notification, which typically would include an Operations Personnel, and /or Liquid Control Personnel.

NOTE:
The Company's means of communication may not be limited by a single source during emergency situations. Communication may be accomplished through a radio system, landline telephone system, continuous cellular communication which is maintained in emergency situations by utilization of a Government Emergency Telecommunications Service (GETS), Wireless Priority Service (WPS) and through the use of satellite phones.

Step	Activity
1	The initial notification of a system emergency can originate from many sources including but not limited to adjacent landowners, the general public, public officials, emergency responders, local law enforcement, Liquid Control, and company employees. **UTILIZE** the applicable form(s) for *Incident Report Log* and **COLLECT** information regarding the caller and the emergency as available at the time of the call.
2	In the event that Liquid Control **DETECTS** the initial discovery of an emergency via the SCADA system, Liquid Control will make the initial notification to field personnel and **INITIATE** the emergency response. In this case, field personnel should **RECORD** notification information on the applicable form(s) for *Incident Report Log* and **PROCEED** to *Section 7.3* below.
3	If appropriate, **ADVISE** the caller with the following applicable information: • Company employees have been or will be dispatched to the location as soon as possible. • Remain clear of the area of the emergency and to the extent possible, do not allow anyone other than company representatives or emergency responders to enter the area. • Do not attempt to shut off any valves or extinguish any fires. • Leave vehicles or equipment in the area of a natural gas emergency as is and do not attempt to move them or turn off ignitions. • Request a call back should there be any significant changes in the situation.
4	**NOTIFY** the Public Safety Access Point PSAP(s), commonly referred to as 9–1–1 emergency call centers, or the local equivalent, of indications of a pipeline facility emergency. Pipeline facility operators should ensure the call to the appropriate PSAP is made promptly, and to as many jurisdictions as is necessary. A direct-inbound ten digit number must be used for the specific PSAP, since a call to 9–1–1 would be routed only to the PSAP for the caller's location.
5	**INFORM** subsequent callers reporting the same emergency event that the company is aware of the emergency and is taking steps to respond. **RECORD** any additional information provided by subsequent callers on the applicable form(s) for *Incident Report Log*.
6	**IDENTIFY** whether or not there has been an **Incident Commander** and General Staff members appointed and how to contact them.

NOTE: Acquire the following additional information to the extent possible or applicable when receiving notifications pertaining to emergencies or other abnormal situations.

- The name of the facility if known
- The number and size of pipelines or type of facility involved
- The current operating pressures and operating pressure ranges (MOP)
- The nature of the event, such as:
  - Fire
  - Flammable liquid or gas escaping with or without a fire
  - Toxic or hazardous vapor cloud release
  - Trench collapse
  - Suspicious package
  - The immediate threat to public safety
  - The occurrence of injuries or fatalities

7.2.1 Plan Activation

To accomplish the above objectives, this plan incorporates a tiered response strategy comprised of the following:

- Notification of company management that an emergency event has occurred
- The Everbridge MATRIX program generates a burst call-out of company executives and/or activation of the Emergency Operation Center (EOC)
- The dispatch of a Rapid Response Team to evaluate resource needs and verify appropriate response activities within the first 12 hours
- If necessary, the dispatch of an emergency response organization composed of various support resources to effectively manage the event

The plan is activated by the Emergency Management Team Director for events that:

- Exceed the limits of local response capability
- Threaten impact to employee or public safety, sensitive environmental resources or significant economic areas
- Require regulatory notification and/or response from the Pipeline and Hazardous Materials Safety Administration (PHMSA), Environmental Protection Agency (EPA), Federal Energy Regulatory Commission (FERC) or other agencies
- Require activation of regional or national oil spill response organizations

7.3 Confirmation and Classification of the Emergency

Following the initial notification of a system emergency, the emergency will be confirmed and classified so that appropriate response measures are taken. This process will be dependent on the nature of the emergency, who receives the initial notification, and what additional information or data is possessed at the time of the notification.

Step	Activity
1	**CONFIRM** the initial report of a system emergency to the extent possible using the following means: • Operations Personnel – **ANALYZE** locally available operating data

Step	Activity
	and **DISPATCH** personnel as required to confirm by visual inspection the location and extent of the emergency. • Liquid Control - **ANALYZE** SCADA operating data and **DISPATCH** field personnel as required to confirm by visual inspection the location and extent of the emergency.
2	Upon confirmation and/or in parallel with confirmation efforts, **REPORT** the confirmed emergency to the organization's management.
3	**UTILIZE** the criteria in *SOP HLA.04 Initial Reporting and Investigating Events* **CLASSIFY** the emergency.
4	**REPORT** the emergency in accordance with, *SOP HLA.04 Initial Reporting and Investigating Events* and, if applicable, *SOP HLA.12 Safety Related Condition Reporting*.

7.4 Responding to and Notification of Emergencies

The following procedures provide general first response activities upon the report of an emergency. During the emergency phase of the response, the primary objective is to protect life. Secondary to this objective is to secure or make safe the pipeline system and eliminate the source of gas or other hazardous material. The response protocol is based on the Eight Step Process© contained in the National Incident Management System, and more specifically the Incident Command System. Most emergency responders are trained in the ICS and therefore will expect a company response that follows the Eight Step Process©. These basic steps will guide employees sufficiently for handling any emergency:

1. Site Management and Control
2. Identify the Problem
3. Hazard and Risk Evaluation
4. Select Personal Protective Clothing and Equipment
5. Information Management and Resource Coordination
6. Implement Response Objectives
7. Decontamination and Clean-up Operations
8. Terminate the Incident

WARNING: All response actions should be directed toward protecting people first and then property. Consider the activation of emergency shutdown systems or pressure reduction of a facility segment to minimize the hazards to life and property.

Step	Activity
1	**DETERMINE** the resources required to response to the emergency and **MOBILIZE c**ompany and third party resources to the site. **CONSIDER** steps 1 through 6 above when determining resource requirements. **DETERMINE** the necessity to expand the company's response effort in accordance with the Incident Command System and **ACTIVATE** those resources as needed.
2	**NOTIFY** the appropriate local emergency response and law enforcement agencies as applicable for the emergency. **PROVIDE** information pertaining

Step	Activity
	to the emergency acquired in *Sections 7.2* and *7.3* above.
3	**ESTABLISH** and maintain a perimeter around the location of the emergency that provides for sufficient space for conduct of all subsequent response operations in a safe and efficient manner. **RESTRICT** access to the immediate area allowing ingress only to authorized personnel and local emergency responders.

NOTE: Local law enforcement authorities can provide assistance to enforce this requirement.

Step	Activity
4	**IDENTIFY** the scope and nature of the problem including recognition and verification of all hazardous materials involved, the type of facilities involved and any collateral exposures.

NOTE: The following information should be obtained in order to enable the hazard and risk assessment activity.

1. The number and size of pipelines or type of facility involved
2. The current operating pressures and operating pressure ranges
3. The nature of the event, such as:
   - Fire
   - Flammable liquid or gas escaping with or without a fire
   - Toxic or hazardous vapor cloud release
   - Trench collapse
   - Suspicious package
4. Hazardous product(s) involved and unique safety hazards or considerations associated with the incident. Consider such constituents as:
   - Highly Volatile Liquids
   - Refined Petroleum Products
   - Crude Oil
   - H2S
   - FeS
   - Other
   - Physical characteristics, such as whether or not the product contains H2S concentrations greater than 100 parts per million
5. Dependent on product and consultation with local Emergency Responders to establish a site-specific emergency plan based on the Emergency Response Guidebook. Use appropriate industry approved hydrocarbon detection devices to determine the extent and coverage of the vapor cloud / hazardous area (i.e. vapor analyzer or combustible gas indicators)
6. The components isolated from sources of hazardous liquids, when the isolation occurred or will be completed.
7. Personal injuries/fatalities/missing persons:
   - The number of fatalities and location

- The number of missing persons and last known location
- The number of people treated for injuries at the scene or transported to a medical center for treatment and the location to which the injured person(s) was transported

8. The type of injuries sustained
9. Type and extent of property damage involved:
   - Pipeline
   - Pipeline facilities
   - Other company property
   - Non-company property
   - Collateral property
10. Risk exposures in close proximity to the incident:
    - Residences
    - Schools or restaurants
    - Places where the public might congregate
    - Flammable materials storage
    - Other pipelines or utilities such as electrical substations
11. Hazardous product(s) involved and unique safety hazards or considerations associated with the incident. Consider such constituents as
    - Highly Volatile Liquids
    - Refined Petroleum Products
    - Crude Oil
    - H2S
    - FeS
    - Other
    - Physical characteristics, such as whether or not the product contains H2S concentrations greater than 100 parts per million
12. Current and expected weather conditions
    - Liquids releases into waterways must consider temperature, wind and wave directions and velocity, and tides.
13. Flammable gas releases, which do not ignite, could be affected by humidity and wind direction.

Step	Activity
5	**ASSESS** the hazards present, **EVALUATE** the level of risk and **ESTABLISH** an Incident Action Plan (IAP) designed to mitigate the problem. If appropriate, **UTILIZE** the pre-planned emergency procedures contained in Appendix B and/or specific procedures contained in the Area Emergency Response Plan. These procedures comprise the initial Incident Action Plan.
6	**DETERMINE** the appropriate PPE required for personnel involved in the response activity and **PROVIDE** as needed.
7	**PROVIDE** information to local emergency responders relative to the emergency and the company's emergency response procedures. Jointly **DETERMINE** each responder's actions associated with the IAP and continue to communicate and coordinate assigned IAP tasks with local emergency responders. **ESTABLISH** who will be the on-site Incident Commander

Step	Activity
	and/or Operations Officer as applicable and **OBTAIN** contact information.

NOTE: Actual employee and company involvement and assignment of ICS officer in any particular emergency is heavily dependent on the nature of the emergency. It is also dependent on the location of the emergency, involvement of public safety officials, and numerous other factors.

Step	Activity
8	**IMPLEMENT** the IAP and ensure that the incident response priorities are accomplished in a safe, timely and effective manner.
9	If appropriate for the emergency at hand, **ESTABLISH** intervals for subsequent coordination meetings. **RECONVENE** meetings of the responding agents to **DISCUSS** progress made, IAP revisions as needed and transition to the next step.

NOTE: The meeting interval should not exceed one to one and a half hours.

Step	Activity
10	**CONFIRM** completion of the IAP relative to emergency phase of the response and **EVALUATE** any remaining or new hazards or risks. **REVISE** the IAP as needed to address these hazards or risks and implement.
11	**EVALUATE** the need to decontaminate personnel, PPE, and equipment involved in the response and the facilities and/or site of the incident. **DEVELOP** and **IMPLEMENT** a cleanup plan that verifies the safety of company personnel, emergency responders and the public by reducing the level of contamination on scene and minimizing the potential for secondary contamination beyond the incident scene.
12	**TERMINATE** the emergency phase of the response upon completion of all IAP tasks and decontamination/clean-up activities.
13	**INITIATE** post-emergency response operations (PERO) as required and **TRANSFER** command of the incident to the appropriate authority.

WARNING: As soon as a pipeline emergency has been determined, the Area Director of Operations or designee shall establish communications with appropriate local officials and/or emergency response personnel specifically identified in the Emergency Contact Telephone List contained in the field manual to apprise them of the matter and potential effects on the public. Utilize the list of particular events in Appendix B as a guide for types of events to be reported.

7.5 Controlling Released

To control the release of hazardous vapors, the affected section of the system may need to be isolated by shutting in pumps and closing block valves in the area of the leak. The downstream pump may be used to pull the liquid from the affected area until the liquid

Vapors no longer flows through the pump, and then the downstream block valve must be closed. After the leak is isolated, the vapors may be flared down. If the location of the leak cannot be determined, consider shutting the system down. Stoppling should be considered to minimize the quantity released.

7.6 Security

The aspect of security during emergency response activities can evolve in several different ways, depending on the magnitude of the situation and of the makeup of the local emergency response agencies.

NOTE:	As part of the nationally recognized Incident Command System, promulgated by the Department of Homeland Security, the first step of the "Eight Step Process" of the Incident Action Plan is to manage and secure the physical layout of the incident to permit the responders not to have to worry about any people other than themselves. This translates into the possibility that company forces may have difficulty gaining access to the site or to nearby facilities to perform their duties. (Roadblocks will be set up, for example.)

Step	Activity
1	**BE AWARE** of local or federal law enforcement's responsibilities securing physical layout of an incident site and **BE PREPARED** to work with the system that is in place at the incident site in order to manage ingress and egress for those needing to access the site. This may involve displaying company issued identification cards, creating lists of people approved to be in the area, issuing unique ID cards for that incident, or some other means of permitting law enforcement agents to determine easily that access should be permitted.
2	The company may **ASSIGN** or even temporarily **EMPLOY** someone to manage security full time during the course of the incident. **REVIEW** this possibility during the liaison meetings between field personnel and local law enforcement agencies and other emergency response units.
3	**IDENTIFY** and **MARK** or **FLAG** the location of parts and pieces of equipment that have been dislodged from their normal location without disturbing them.

NOTE:	Another aspect of security at incident sites concerns preservation of evidence. To aid in the follow-up investigation and determination of the root cause, once the situation has been brought under control and it is safe to enter the site, field employees need to understand the importance of identifying and marking or flagging the location of parts and pieces of equipment that have been dislodged from their normal location without disturbing them. If practical, leave failed equipment or portions of failed facilities undisturbed until the investigation has gathered all necessary information. If the site cannot be left undisturbed, thoroughly document the site before disturbing it. Documentation will include such things as photographs, dimensioned sketches, corrosion surveys, and collecting soil or liquid samples, as applicable.

7.7 Media Response

Reporters and other media individuals have a legitimate right and even an obligation to the public to obtain correct information about emergency events.

It is the company's desire to address media inquiries with correct information. In order to do so, the person appointed to fulfill the role of Public Information Officer (PIO) assumes the responsibility of relating information to media representatives at the scene of an incident, after having obtained review and approval of the information by the Incident Commander, and possibly the Legal Department.

Step	Activity
1	**REFER** all inquiries to the Public Information Officer, who has adequate knowledge about the particular emergency, unless the information is necessary to help save lives and/or prevent additional injuries. Whenever possible, it is important that the person appointed Public Information Officer has had some training regarding contacts with the media and the Incident Command System.

CAUTION: Employees are to be cautious of persons representing themselves as emergency responders who, in fact, may be media members.

Step	Activity
2	**RELEASE** only facts related to the emergency, as they are determined, as indicated by the chart below. **DO NOT SPECULATE** about any aspect of the event. • What can be released: o What happened and when o The number of known injuries and/or missing persons o What the company is doing or has done to end the emergency o That the company is investigating or will investigate the cause of the emergency o That no further information is available but additional information will be released as soon as possible • What cannot be released: o What you think happened and when you think it started o The names of injured or missing persons and the extent of their injuries o That the company is at fault and accepts blame for the incident o What you think the cause is or was, unless it is plainly obvious such as storm, vehicles left on the scene, etc. o Information pertaining to the frequency of such incidents on other company facilities or the industry in general

Step	Activity
3	**REFER** media telephone calls to the Public Information Officer who has been briefed of the facts of the situation. Vicki Granado Office [redacted] Cell [redacted] Brent Ratliff Office [redacted] Cell [redacted]
4	**ADVISE** the caller that the company's Public Information Officer will be the best company contact for any further information.

NOTE:	Personnel that could be reasonably expected to communicate directly with the media will receive applicable media training on an as-needed basis and as determined by Operations Management

7.8 Post Emergency Response Operations

Following completion of the emergency phase of the response, transition is made to post emergency response operations. This transition may include transfer of the Incident Command to or from company personnel; to different company personnel or to a different outside agency as applicable. In addition, depending on the nature and significance of the incident, the Corporate Emergency Management Team Lead may dispatch the Rapid Response Team to assist field personnel with management of the post emergency response operations. Reference: Emergency Response Management Plans

7.8.1 Investigation of Failures

Perform investigations in accordance with *SOP HLA.11 Investigation of Failures* as appropriate.

NOTE:	In the event that fatalities or injuries resulted from the emergency incident, other outside agencies may be involved in this activity and may assume a lead role in the investigation.

7.8.2 Restoration of Service

Restore service as quickly as practical following isolation, control and repair of any emergency that interrupts service. Be aware that *Section 7.7.1* above may affect access to the incident site and subsequently delay or hamper restoration activities. General procedures for responding to any service outage are as follows.

Step	Activity
1	**CONTACT** the Area Office or Liquid Control with the following information: • A description of the situation • The location of the service outage and your relative location • An assessment of whether company personnel can handle the situation • A request for what assistance is needed
2	**DISPATCH** the required personnel to complete any required repairs.
3	**NOTIFY** any affected companies or customers.
4	**CONSULT** the appropriate section of the Emergency Plan for notification

Step	Activity
	requirements.
5	**DISPATCH** the required personnel to complete any required repairs.
6	After necessary repairs have been completed and company facilities are back in service, **RESTORE** service to all customers.

NOTE: Repair actions must comply with the applicable SOP's and the Engineering Standards.

7.8.3 Emergency Response Review

Perform a review of all emergency response incidents for determining the effectiveness of procedures and the Area Emergency Response Plan. Evaluate the response of company personnel to determine training is effective and compliance with procedures and their effectiveness after each emergency or incident. Initiate any required changes to procedures or the Area Emergency Response Plan using *SOP HLA.03 Management of Change*. For any noted noncompliance with procedures, refer to *.SOP HLA.18 Operator Qualification*. Refer to *SOP HLA.10 Emergency Response Exercises* for further instruction and documentation of this activity.

7.9 Emergency Response Training

Conduct training with all employees and include an annual review of the Area Emergency Response Plan and this procedure to verify that employees are familiar with the plans and procedures and subsequent changes as a result of past experience or other requirements. Refer to *SOP HLA.10 Emergency Response Exercises* for further instruction and documentation of this activity.

7.10 Emergency Assembly Areas

Perform the following steps to declare emergency assembly areas.

Step	Activity
1	**ESTABLISH** two locations, for each pump station or other significant company facility as determined by the Safety Department, where all personnel at the site during an emergency, real or otherwise, will gather and be accounted for when so advised.
2	**USE** that day's work assignments and the Visitor Log to help account for personnel on site at the time of the emergency.
3	**DESIGNATE** one location as the Primary Emergency Assembly Area and the second location as the Alternate Emergency Assembly Area.
4	**IDENTIFY** these locations by signs
5	**ADVISE** all visitors to the location of the assembly areas and the requirement to immediately go there when notified or when certain alarms are sounded.
6	**MAINTAIN** a copy of this manual at the Primary Emergency Assembly Area.

7.11 Liaison with Community Response Agencies and Utilities

Refer to *SOP HLI.40 Public Awareness Plan - Communication with APT RP1162 - defined Stakeholders f*or detailed requirements related to maintaining familiarity with local emergency response agencies.

8.0 Documentation Requirements

Record data in electronic database or utilize the following form(s) as applicable:

- A.15.A Incident Report Log
- A.08.A Emergency Response Training

9.0 References

HLA.03 Management of Change
HLA.04 Initial Reporting, and Investigating Events
HLA.10 Emergency Response Training Exercises
HLA.11 Investigations of Failures
HLA.12 Safety Related Condition Reporting
HLA.15 PHMSA- State - Incident Reporting
HLA.18 Operator Qualification
HLA.19 Area Emergency Response Plan Development
HLA.20 Field Response to Natural Hazards and Potential Disasters
HLI.40 Public Awareness Plan - Communication with APT RP1162 - defined Stakeholders
Safety Procedure S-370 Work Permits

Appendix A: OQ Task Requirements

There are no Operator Qualification (OQ) tasks required for this procedure.

Appendix B: Pre-Planned Incident Action Plans

The following typical emergency scenarios and associated Incident Action Plans (IAP) are provided for quick reference and should be included in the Area Emergency Response Plan and supplemented with other specific IAPs as appropriate for the location.

B.2 Fire Near or Involving Company Facilities

Perform these steps to respond to fires near company facilities

Step	Activity
1	**KEEP** a safe distance. **SECURE** the area, and **RESTRICT** access to trained personnel only.

Step	Activity
2	**CONTACT** the Area Office or Liquid Control with the following information: • A description of the situation • The location of the fire and your relative location • An assessment of whether company personnel can handle the fire • A request for what assistance needed.

NOTE: The Area Office or Liquid Control will notify necessary emergency response agencies, including fire departments as necessary; dispatch company personnel and equipment; log times of significant events; and coordinate offsite activities and monitor communications.

Step	Activity
3	**EVACUATE** any adjacent facilities or buildings that may be endangered. **WAIT** for assistance to arrive if assistance is necessary.
4	If the fire is due to escaping gas or some other flammable material, **ELIMINATE** the flammable fuel source if possible.
5	**EVALUATE** the need and capability to extinguish the fire. **USE** appropriate fire fighting equipment and proper fire fighting techniques.
6	If the fire is to be contained by a fire department, and the fire involves escaping gas or company facilities, **INFORM** the Incident Commander (normally the Fire Chief) of what to do and what not to do regarding the fire and the company facilities. **PLAN** to become a part of the Incident Command Staff keeping the Commander informed of the company's actions to eliminate the source.
7	**ALLOW** the fire to burn out by itself, if that is desirable because of escaping product or comparable flammable material.

B.3 Explosion Near or Involving Pipeline Facilities

Perform these steps to respond to an explosion near or involving pipeline facilities.

WARNING: If one explosion has occurred, particularly where no fire is burning, be especially alert to the possibility that additional explosions could occur.

Step	Activity
1	**KEEP** a safe distance. **SECURE** the area, and **RESTRICT** access to trained personnel only.
2	**EVACUATE** any adjacent facilities or buildings that may be endangered.
3	**WAIT** for assistance to arrive if assistance is necessary.

Step	Activity
4	**CONTACT** the Area Office or Liquid Control and report a description of the situation as follows: • The number of injuries or people in danger • Facility damage or facilities in jeopardy of damage • Any fire or leaking gas • The location where the explosion occurred and your relative location • An assessment of whether company personnel can handle the situation • A request for what assistance is needed

NOTE: The Field Office or Liquid Control will notify necessary emergency response agencies, including fire departments as necessary; dispatch company personnel and equipment; log times of significant events; and coordinate offsite activities and monitor communications.

B.4 Natural Disasters

Refer to *SOP HLA.20 Field Response to Natural Hazards and Potential Disasters* for response to natural hazards including:

- Tornados
- Tropical Storm and Hurricane
- Flooding
- Wildfire
- Earth Movement

B.5 Pump Station Emergency Response Procedures

Perform these steps for emergencies or accidents at pump stations.

CAUTION:

- Whenever a sound is heard that may indicate escaping vapor in or near a pump station, or if there appears to be an unusual odor of gas in the area, operate the emergency shutdown system and evacuate the area immediately.
- Implementation of these emergency procedures does not provide a relaxation of the Maximum Operating Pressure (MOP) limits.

Step	Activity
1	All personnel shall **CLEAR AWAY** from the hazardous area at first indication of danger and **TRIP** the Emergency Shutdown Stand, if possible, without endangering themselves.
2	**GO** to the Emergency Assembly Area or an alternate in case the first designated area is hazardous, as soon as possible.

Step	Activity
1	All personnel shall **CLEAR AWAY** from the hazardous area at first indication of danger and **TRIP** the Emergency Shutdown Stand, if possible, without endangering themselves.
3	**DO NOT RE-ENTER** the danger area for any reason until the hazard has been determined and corrected or controlled.

NOTE: The person on duty in the highest position responsible for the operation of the station at the time of the emergency shall be in charge until relieved of this responsibility. This person is solely responsible to handle the emergency and to give all instructions and directions necessary.

Step	Activity
4	**USE** radio equipment or voice for communication. **DO NOT USE** hand signals.
5	**ASSIGN** a person to handle communications according to instructions in this manual at the Communications Center.

B.6 Onshore Pipelines Emergency Response Procedures

Follow these procedures for emergencies or incidents for onshore pipeline facilities.

CAUTION: Under no circumstances must the Maximum Operating Pressure (MOP) be exceeded

Step	Activity
1	If delivery stations are connected to more than one pipeline, **CLOSE** the supply from the affected line and **MAKE CERTAIN** that product is flowing from the non-affected line. **NOTIFY** the Liquid Control of which valves are operated open, closed, or checked open or closed, and the time of the action.
2	With the acknowledgment and acceptance of Liquid Control, **REROUTE** the flow through operating line segments.
3	**SHUT OFF** all cathodic units that could possibly affect the area of the pipeline that will be repaired.

NOTE: Impressed current cathodic protection creates current flow through the pipelines. Even though the pipes are grounded during repair, it is important to minimize the chance that a spark could jump between pipe segments during hot tie-ins.

Step	Activity

Step	Activity
4	**ARRANGE** for necessary heavy equipment.
5	**ALERT** the Central Warehouse, and **ARRANGE** for material, if required.
6	**MAKE** repairs with properly rated and/or tested materials.
7	**NOTIFY** Liquid Control and affected locations when facility is ready to be returned to service.
8	**RETURN** all facilities to normal operation.
9	**PROVIDE** gate valve setting diagrams on which are included: • Directions to the valve site from the locations' office • GPS coordinates (longitude, latitude, and elevation) • Instructions of which valves to operate in order to isolate a section of pipeline and how to blow down the section (including any precautions for overhead obstructions, liquids that may be present, and noise considerations) • Instructions of what measuring stations are in the valve section being isolated and how to handle them; when to notify affected parties and who to notify • Instructions of which emergency response agencies to notify and which have jurisdiction in the vicinity of the valve site • All Pipeline MOPs It is not necessary to maintain a copy of these diagrams at the site.

ENERGY TRANSFER

PHMSA / States - Accident Reporting

Standard Operating Procedures

Applicable to Hazardous Liquids Pipelines and Related Facilities

Code Reference :	**Procedure No.: HLA.15**	
49 CFR 195.48, 195.50, 195.52, 195.54, 195.58	***Effective Date: 06/05/18***	**Page 1 of 9**

1.0 Procedure Description

This Standard Operating Procedure (SOP) lists processes, guidelines and responsibilities for accident reporting.

2.0 Scope

This SOP establishes responsibilities for activities associated with determining the reportability and reporting accidents on Interstate and Intrastate in-service hazardous liquid pipelines.

3.0 Applicability

This SOP applies to all regulated hazardous liquid pipelines.

4.0 Frequency

As required.

5.0 Governance

The following table describes responsibility, accountability, and authority of the operations described in this SOP.

Function	Responsibility	Accountability	Authority
All Operations	Regulatory Compliance Representative	Regulatory Compliance Representative	Director of Regulatory Compliance

6.0 Terms and Definitions

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *SOP HLA.01 Glossary and Acronyms*.

Terms	**Definitions**
Accident	A Reportable event as determined by the guidelines set forth in *Section 7.1*.
Confirmed Discovery	When it can be reasonably determined, based on information available to the operator at the time that a reportable event has occurred, even if only based on a preliminary evaluation.
Telephonic Report	A Telephonic Report made to PHMSA / State Agencies, by the applicable regulatory compliance representative within one (1) hour of discovery of a reportable accident for Interstate and / or Intrastate Pipelines.
30 Day Report	A written report on *PHMSA F 7000-1* which must be submitted to PHMSA / State Agency as soon as practicable but no more than 30 days after the accident has occurred.
Supplemental / Final Report	Follow up report that revises and / or updates information reported on the 30 Day Report and provides information on what actions were taken to repair the facility and /or correction implemented.

7.0 PHMSA / States – Accident Reporting

The following procedure is described in this section:

- Determine Reportability
- Telephonic Reporting Procedures
- Written Reporting Procedures

7.1 Determine Reportability

Use the following guidelines to determine which notification method is required:

- Telephonic Guidelines
- 30 Day Written Report Guidelines

7.1.1 Telephonic Reporting Guidelines

One of the following conditions requires a Telephonic Report

1. Caused a death or a personal injury requiring hospitalization;
2. Resulted in either a fire or explosion not intentionally set by the operator;
3. Caused estimated property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding $50,000;
4. Resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines; or
5. In the judgment of the operator was significant even though it did not meet the

criteria of any other paragraph of this section.

Serious interruptions of service on FERC jurisdictional facilities must be reported to the Sr. Director Certificates & Tariffs, who will then provide a report to FERC. Serious interruptions of service shall include interruptions of service to communities, major government installations and large industrial plants outside of communities or any other interruptions which are significant in the judgment of the pipeline company.

NOTE:
In determining whether an event is significant, consider circumstances such as occurrences that may result in inquiry by a regulatory agency due to possible media coverage, proximity to a major metropolitan area, evacuation of buildings, unintentional fire or explosion or traffic diversion, etc. These are examples of things to consider among all the other circumstances in determining significance. They are not all inclusive, and do not necessarily make an event significant, nor define a reportable incident. They are an aid in making a judgment call.

7.1.2 30 Day Written Reporting Guidelines

One of the following conditions requires a 30 Day Written Report:

- Explosion or fire not intentionally set by the operator
- Release of 5 gallons (19 liters) or more of hazardous liquid or carbon dioxide, except that no report is required for a release of less than 5 barrels (0.8 cubic meters) resulting from a pipeline maintenance activity if the release is:
  - Not otherwise reportable under this section;
  - Not one described in Section 7.1.1 (4)
  - Confined to company property or pipeline right-of-way; and
  - Cleaned up promptly
- Death of any person;
- Personal injury necessitating hospitalization;
- Estimated property damage, including cost of clean-up and recovery, value of lost product and damage to the property of the operator or others, or both, exceeding $50,000.

7.2 Telephonic Reporting Procedures

Follow the guidelines below for making Telephonic Reports

Step	Activity
1	**RECEIVE** telephone reports from the Liquid Control or field operations of those events meeting one of the criteria in Section 7.1, **COMMUNICATE** the situation to the designated people, and evaluate reporting in conjunction with legal staff if appropriate.
2	**REPORT** accidents to federal and state regulatory agencies using telephone reports as applicable.
3	If an event is determined to be an accident meeting the criteria found under Section 7.1.1, Regulatory Compliance will contact the National Response Center (NRC) within one (1) hour of confirmed discovery. Per PHMSA Advisory bulletin ADB-02-04, additional telephonic report(s) should be filed there are increases or decreases in the number of fatalities or injuries, product release estimate that is at least 10 times greater than the amount initially reported or the extent of property damage increases to at least 10 times greater than that initially reported **CALL** (NRC): 1-800-424-8802. In addition, contact the appropriate State Agency within one (1) hour.
4	As more information becomes available, Regulatory Compliance must contact NRC within 48 hours of the confirmed discovery of the accident to revise or confirm the initial report. Even if there are no changes or revisions to the initial report, Regulatory Compliance must confirm the estimates in the initial report.
5	See *SOP HLA.01 Glossary and Acronyms* Appendix 6.0 for Current State Agency Contacts information. A Courtesy call may be given to the PHMSA Accident Investigation Division to the on call inspector at the discretion of Regulatory Compliance: PHMSA Accident Investigation Division – Oklahoma City, OK On Call Contact: (888)719-9033 Email: PHMSAACCIDENTINVESTIGATIONDIVISION@dot.gov Leader: Peter Katchmar Email: [redacted] Office: [redacted]

NOTE: Louisiana requirement – Title 43 § XI Office of Conservation – Pipeline Division (LA Administrative Code)

IMMEDIATE Notification to LA State Police of any release that presents a potential hazard to human health, environment or property.

NOTE: Texas requirement – Chapter 8, Rule 8.301(A)

Notify the TXRRC via emergency number (512) 463-6788 at the earliest practicable moment following discovery of the incident (within two hours). This requirement applies to any release of hazardous liquid from a pipeline system that is reportable (≥ 5 gallons).

NOTE: Utilize the equations in the Tabs at the bottom of Form A.15.A to calculate and provide a reasonable initial estimate of the amount of released product.

7.3 Written Reporting Procedures

If an accident is determined to be reportable, the necessary written report is submitted to PHSMA and appropriate state agencies.

- For intrastate facilities, and interstate facilities located within a state where the state is an agent for PHSMA, both the state and the PHSMA must receive reports.

See *SOP A.01 Glossary and Acronyms* Appendix 6.0 for Current State Agency Contacts information.

7.3.1 30 day and / or Supplemental / Final Written Report

Regulatory Group will complete PHMSA Form F7000-1 within 30 days of the Accident

Step	Activity
1	**SUBMIT** the Incident Report (PHMSA F 7000-1) **electronically** via the PHMSA Portal as soon as practicable but no more than days of the accident. Accident Reports submitted through the PHMSA Portal shall be forwarded to each State with Regulatory Authority. See *SOP A.01 Glossary and Acronyms* Appendix 6.0 for Current State Agency Contacts information.
2	**SUBMIT** a supplemental report when an incomplete (PHMSA F 7000-1) was initially submitted because of unknown information that later becomes available or when information submitted on the initial report is later found to be in error. Any supplemental (PHMSA F 7000-1) shall be submitted as soon as practicable but no more than 30 days from when this additional or corrected information becomes available with a clear reference by date and subject to the original report. **MARK** as a supplemental and /or final report as necessary. Supplemental Reports submitted through the PHMSA Portal shall be forwarded to each State with Regulatory Authority. See *SOP A.01 Glossary and Acronyms* Appendix 6.0 for Current State Agency Contacts information.

NOTE: General practice would include mailing hard copies to State Agencies in addition to the Electronic Submittal. Consider using Certified with return receipt when necessary for documentation.

8.0 Documentation Requirements

Record data in electronic database or utilize the following form(s)as applicable:

- A.15.A Incident / Accident Report
- PHMSA Form F7000-1

The Regulatory Compliance Department maintains the official files on events that are reported to outside agencies. Each file will be kept for the life of the facility. Legal department shall be contacted prior to destroying a file.

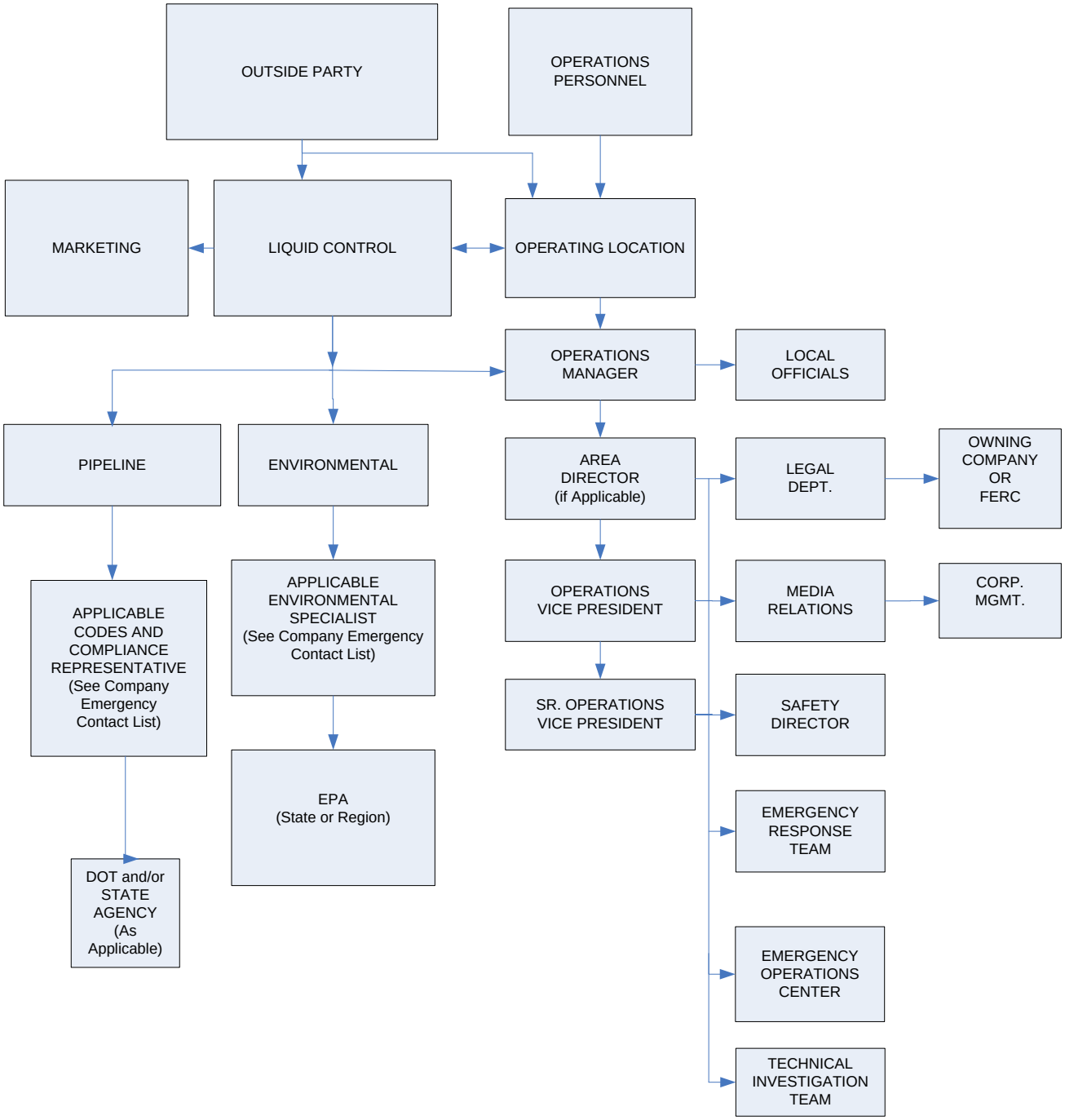
9.0 References

There are no references for this SOP.

Appendix A: OQ Task Requirements

There are no Operator Qualification (OQ) tasks required for this SOP.

Appendix B: **Accident Notification Sequence**


OUTSIDE PARTY
OPERATIONS PERSONNEL
MARKETING
LIQUID CONTROL
OPERATING LOCATION
OPERATIONS MANAGER
LOCAL OFFICIALS
PIPELINE
ENVIRONMENTAL
AREA DIRECTOR (if Applicable)
LEGAL DEPT.
OWNING COMPANY OR FERC
APPLICABLE CODES AND COMPLIANCE REPRESENTATIVE (See Company Emergency Contact List)
APPLICABLE ENVIRONMENTAL SPECIALIST (See Company Emergency Contact List)
OPERATIONS VICE PRESIDENT
MEDIA RELATIONS
CORP. MGMT.
SR. OPERATIONS VICE PRESIDENT
SAFETY DIRECTOR
EPA (State or Region)
EMERGENCY RESPONSE TEAM
DOT and/or STATE AGENCY (As Applicable)
EMERGENCY OPERATIONS CENTER
TECHNICAL INVESTIGATION TEAM

Appendix C: **The following annual holidays are observed by federal agencies.**

New Year's Day ..... January 1
Martin Luther King Day..... 3rd Monday in January
President's Day..... 3rd Monday in February
Memorial Day..... Last Monday in May
Independence Day ..... July 4
Labor Day..... 1st Monday in September
Columbus Day..... 2nd Monday in October
Veterans Day ..... November 11
Thanksgiving ..... 4th Thursday in November
Christmas..... December 25

Appendix D: State Reporting Requirements Reporting Requirements for State Agencies.

Follow PHMSA requirements 195.50, 195.52 and 195.54 for each of the following states:

1. Texas Railroad Commission

NOTE: Texas requirement – Chapter 8, Rule 8.301(A)

Notify the TXRRC via emergency number (512) 463-6788 at the earliest practicable moment following discovery of the incident (within two hours). This requirement applies to any release of hazardous liquid from a pipeline system that is reportable (≥ 5 gallons).

2. Louisiana Department of Natural Resources

NOTE: Louisiana requirement – Title 43 § XI Office of Conservation – Pipeline Division (LA Administrative Code)

IMMEDIATE Notification to LA State Police of any release that presents a potential hazard to human health, environment or property.

3. New Mexico Public Regulation Commission

4. Oklahoma Corporation Commission

5. New York 258.11 Accident Reports
   a) Each corporation shall report all accidents in which liquid petroleum pipeline facilities may be involved and which may result in any of the following:

1) explosion or fire;
2) death or injury to any person;
3) property damage;
4) loss of 25 or more barrels of liquid;
5) escape of vaporized liquid to the atmosphere; or
6) could cause concern because of coverage by news media.

b) All such accidents shall be immediately reported by telephone to the Department through its gas emergency notification system.

c) A written report of each accident in which liquid petroleum pipeline facilities were involved shall be submitted to the Office of Gas and Water of the department in Albany within 30 days. The report shall set forth a chronological sequence of events including a detailed description of the:
   1) accident;
   2) response, action, and investigations by the corporation; and
   3) results and findings of the investigations.

6. Pennsylvania

Immediate telephonic notification (within an one hour) of confirmed discovery of any reportable accident on company pipelines systems. . This Immediate notification process was requested of us by PA PUC.

ENERGY TRANSFER

Area Emergency Response Plan Development and Maintenance

Standard Operating Procedures

Applicable to Hazardous Liquids Pipelines and Related Facilities

Code Reference:	**Procedure No.: HLA.19**	
49 CFR: 195.402, 195.438	***Effective Date: 05/01/15***	**Page 1 of 6**

1.0 Procedure Description

This Standard Operating Procedure (SOP) establishes the requirements for written Emergency Response Plans. These plans contain vital information that may be needed during first response to an emergency including reference to pre-planned procedures and contact and resource information for emergency response agencies, local law enforcement, support contractors, materials, and supplies.

2.0 Scope

This SOP provides the core information requirements included in the plan which in turn is used for mobilization of personnel and resources, while continuing operation of facilities during and emergency to minimize service interruption.

3.0 Applicability

This SOP applies to field employees and management responsible for developing and maintaining the plan.

4.0 Frequency

Initially: Develop / Maintain a plan in accordance with this procedure.

As required: Maintain reference procedures and updated contact and resource information.

Annual (Not to exceed 15 months): Review Plan

After an Emergency: Review Plan

5.0 Governance

The following table describes the responsibility, accountability, and authority of the operations described in this SOP.

Function	Responsibility	Accountability	Authority
Developing the Plan	Operations Personnel	Operations Manager	Director of Operations
Updating and Maintaining the Plan	Operations Personnel	Operations Manager	Director of Operations

6.0 Terms and Definitions

For general terms, refer to *SOP* HL*A.01 Glossary and Acronyms*.

7.0 Area Emergency Response Plan Development and Maintenance

The following procedures are described in this section:

- Plan Development
- Updating and Maintaining the Plan
- Identify Areas that Require Immediate Response

Use this SOP in conjunction with *SOP* HL*A.08 Field Emergency Response Procedures.*

7.1 Plan Development

An emergency response plan has been developed for each location and the facilities for which they are responsible, and is included in the Emergency Plan Handbook kept at each location and by each Operations Manager.

Step	Task
1	**UTILIZE** *Appendix B Field Emergency Response Plan Template* to create the *Area Emergency Response Plan*. **ORGANIZE** and **ASSEMBLE** plans according to the structure of the template.
2	**AUTHORIZE** exceptions to the template.
3	**DISTRIBUTE** the *Area Emergency Response Plan* to all Field Locations and places to be readily available to company location personnel.
4	**PROVIDE** Area Emergency Response Plan Training.

NOTE:

- The use of this template promotes consistency and uniformity among plans at various locations, minimizing the potential for problems regarding organization and basic content.
- Field supervision is required to have a copy of the plan readily available for use.

Step	Activity
5	**MAINTAIN** current copy of the Emergency Plan Handbook

NOTE: An Emergency Response Plan template was used to develop the handbook. The template was used to promote consistency and uniformity, minimizing the potential for problems with structure, organization and basic content.

Step	Activity
6	**DISTRIBUTE** to supervisors; and **PLACE** in readily available locations for other responsible persons.
7	**PERIODICALLY** review, organize, and reassemble the handbook according to the table of contents template as necessary.

7.2 Updating and Maintaining the Plan

Perform the following steps to update the company's emergency contact data

Step	Activity
1	**MANAGE** the Area's *Management of Change (MOC) Plan.*
2	**UPDATE** the Area contact, resource, supporting documentation (drawings, schematics, etc.), and asset information as needed to maintain accurate information.
3	**DISTRIBUTE** changes to these lists via the company intranet throughout the organization and **MAINTAIN** the updates within the *Area Emergency Response Plan.*
4	**UPDATE** the Area on-call schedule and **DISTRIBUTE** the schedule throughout the organization via the company intranet.
5	**REVIEW** the effectiveness of the Emergency Plan, after they are used in an Emergency. **INCLUDE** any indicated changes using *SOP HLA.03 Management of Change*. **IMPLEMENT** any indicated changes. **COMPLETE** applicable forms or electronic database entries
6	**REVIEW** plan annually for changes to Emergency Contacts or other needed changes. **IMPLEMENT** any indicated changes. **COMPLETE** applicable forms or electronic database entries
7	**PROVIDE** Emergency Plan training and effectiveness review. **COMPLETE** applicable forms or electronic database entries

7.3 Identify Areas that Require Immediate Response

Each Operations Area must determine which pipeline facilities are located in areas that would require an immediate response by the operator to prevent hazards to the public if the facilities failed or malfunctioned.

7.3.1 Minimize Hazard in Immediate Response Areas

In addition to Identifying these areas Operations Personnel should:

- Take steps to minimize the potential for hazards identified in these areas.
- Minimize the likelihood of accidental ignition of vapors in these areas.
- Prevent Smoking or Open Flames where there is a potential or presence of flammable vapors or liquids.

7.3.2 Examples of Immediate Response Areas

Some examples of Immediate response areas include but are not limited to:

- Identified HCA's
- Residential areas
- Commercial areas
- Industrial areas
- Topography
- Waterways / wetlands

NOTE: In some cases an Immediate Response area may require compliance with additional regulations such as Oil Spill Pollution Act (OPA 90 Plan)

8.0 Documentation Requirements

Record data in electronic database or utilize the following forms as applicable:

Activity	Reporting
Acknowledge the requirements as outlined in the SOP have been completed. Record exceptions, if any, in the comments section. Retain the records in EAM for the life of the facility.	Electronic Maintenance System

9.0 References

HLA.08 Field Emergency Response Procedures

Area Emergency Response Plan

HLA.03 Management of Change

Appendix A: OQ Task Requirements

There are no Operator Qualification (OQ) task requirements for this SOP.

Appendix B: Area Emergency Response Plan Template

Use this template to create the Area Emergency Response Plan.

Introduction

The purpose of the Area Emergency Procedures Manual is to provide a consolidation of the information essential in emergency situations.

Proper preparations reduce the time required to respond to an emergency situation and errors which could compound problems. Preparation for emergencies includes quickly accessing:

- Correct contact information
- Up to date facility information, drawings, and maps
- Emergency assembly areas
- Emergency equipment and vehicle list

The Area Emergency Procedures Manual contains the above information.

In addition, preparation for emergencies includes knowing the following:

- What information to obtain when a call concerning a possible emergency is received
- What conditions constitute an emergency
- What emergency officials and response teams are to be notified
- What information is to be sent to Company management
- The proper response to the emergency
- How and which Company personnel to contact at all times
- The location of equipment and materials needed during an emergency

HLA.08 Field Emergency Response Procedures provides this information as well as emergency operating procedures used to identify, control, and eliminate hazardous conditions resulting from leaks, fires, natural disasters, and other situations.

In an emergency, there are priorities that are always maintained, as indicated in Table 1: Emergency Response Priorities, see following page. By utilizing this manual in conjunction with *Field Emergency Response Procedures* these priorities are achieved.

Table 1: Emergency Response Priorities

Priority	Item
1	Safety of the general public and Company personnel
2	Coordination with emergency response officials
3	Protection of public and Company property
4	Continuity or interruption of gas service to customers
5	Public relations with media and the general public

Sample Template for Building Area Emergency Response Plans

Personnel Phone List
Emergency Response Agency Phone lists
Contractors Phone list
Driving Directions to facilities
    Pipeline Segments
 Meter Stations
Amine Plants
Main Line Valves
Pump Stations
Piping schematics
    Pipeline Segments
    Meter Stations
    Amine Plants
    Main Line Valves
    Pump Stations
Facility MOPs
Tools
Distribution List
Revision Log

Standard Operating Procedures

Applicable to Natural Gas & Liquids Pipelines and Related Facilities

Emergency Response Procedures

Code Reference :	**Procedure No.: CRM.11**	
49CFR: 192.615, 192.631/195.446	**Effective Date:** ***03/24/17***	**Page 1 of 22**

1.0 Procedure Description

The purpose of this Standard Operating Procedure (SOP) is to provide instruction and guidance to Control Room employees when preparing for and responding to an emergency event.

2.0 Scope

This SOP establishes pre-planned response activities to be used in the event of a facility incident, failure or other emergency. The response activities included in this procedure align with those required by regulation. These procedures apply to all pipeline facilities.

An effective response to an emergency should provide the following:

- Incoming notification, confirmation and classification of the emergency situation.
- The contact and mobilization of company and third party resources required to respond to the emergency and/or restoration activities.
- Emergency shutdown, pressure reduction, and/or isolation as applicable to the scenario and as needed to make the conditions safe.
- Establishment and maintenance of communications with company personnel and local emergency responders, law enforcement, and public officials.
- The safety of the public and company personnel above all other considerations.
- The protection of public and company property to the extent possible.
- Minimization of the impact to customers.
- Preparedness and response procedures for typical emergency scenarios.
- Safe restoration of facilities and services.
- Training and review of emergency response activities.

The procedures contained in this SOP either directly or by reference accomplish the above objectives.

3.0 Applicability

This SOP applies to all pipeline facilities and related employees that are required to respond to an emergency.

4.0 Frequency

As needed: Response Activities

Annually: Training

5.0 Governance

The following table describes the responsibility, accountability, and authority of the operations described in *Section 7.0* of this SOP.

Function	Responsibility	Accountability	Authority
Initial Notification of Emergency	Controllers	Supervisor/ Manager	Director/VP
Confirmation and Classification of the Emergency	Operations Personnel	Operations Manager	Area Director
Responding to and Notification of Emergencies	Controllers	Supervisor/ Manager	Director/VP
Media Response	Media Relations	Media Relations	Media Relations
Post Emergency Response Operations	Controllers	Supervisor/ Manager	Director/VP
Emergency Response Review	Controllers	Supervisor/ Manager	Director/VP
Training	Controllers	Supervisor/ Manager	Director/VP

6.0 Terms and Definitions

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *A.01 Glossary and Acronyms*.

Terms	**Definitions**
Emergency	Any situation demanding immediate corrective action, which may involve company facilities or operations, endangerment of human life, and company and public property damage and which may affect normal service to customers. Emergencies may result from numerous events, including but not limited to the following: • Leaking or blowing gas near or involving a pipeline or pipeline facility • Gas detected inside or near a building (detection by odor, sound, visually, or with an instrument) • Fire located near or directly involving a pipeline or pipeline facility • An explosion near or directly involving a pipeline or pipeline facility • Substantial service interruptions to a pipeline or pipeline Facility • Release or spill of a hazardous substance causing, or likely to cause, an environmental impact • Potential pipeline events such as those listed above due to natural disasters such as: – Wind storms – Hail – Flooding – Tornado – Hurricane – Earth movement (e.g., landslides, earthquake, subsidence)

Terms	**Definitions**
	• Civil disturbances or other acts affecting physical security that could disrupt operations (such as vandalism, arson, bomb threats, kidnapping, biological threats, public confrontations or riots) • Any unusual situation whereby human life or significant property is endangered

7.0 Tasks and Activities

This procedure contains the following sections:

- Control Room emergency response
- Initial notification of emergency
- Confirmation and classification of the emergency
- Responding to and notification of emergencies
- Emergency Response Procedure
- Media response
- Post emergency response operations
- Guidelines for reporting an MAOP Exceedance
- Investigation of Failures
- Field Location Security Breach
- IT SCADA Security Breach
- Control Room Security Breach
- Emergency Simulation Drills
- Restoration of Service
- Emergency response review
- Incident Reporting

7.1 Control Room

This SOP will supplement the procedures relative to the Control Room and Field Operations Area including company and external contact information, resource-planning information, and Area specific procedures as may be required.

Code Reference :	**Procedure No.: CRM.11**	
49 CFR: 192.615, 192.631/195.446	**Effective Date:** ***03/24/17***	**Page 6 of 22**

Emergency Response

7.2 Initial Notification of Emergency

Perform the following activities during the initial notification of a system emergency. These activities will be performed by whomever receives the initial notification, which typically would include either an Operations Personnel member, Area office personnel, Area Management, or Control Room personnel (Also see Appendix B).

Step	Activity
1	In the event that Control Room detects the initial discovery of an emergency via the SCADA system, Control Room will make the initial notification to field personnel and initiate the emergency response. Control Room personnel should **RECORD** information on Form *F.04 Initial Notification and create a MOCA for Lessons Learned/Table Top Exercises*.
2	The initial notification of a system emergency can also originate from many sources including but not limited to adjacent landowners, the general public, public officials, emergency responders, local law enforcement, and company employees. **UTILIZE** Form *F.04 Initial Notification and create a MOCA for Lessons Learned/Table Top Exercises* and **COLLECT** information regarding the caller and the emergency as available at the time of the call, and **PROCEED** to below.
3	If appropriate, **ADVISE** the caller with the following applicable information: • Company employees have been or will be dispatched to the location as soon as possible. • Remain clear of the area of the emergency and to the extent possible, do not allow anyone other than company representatives or emergency responders to enter the area. • Do not attempt to shut off any valves or extinguish any fires. • Leave vehicles or equipment in the area of a natural gas emergency as is and do not attempt to move them or turn off ignitions.

Code Reference :	**Procedure No.: CRM.11**	
49 CFR: 192.615, 192.631/195.446	**Effective Date:** ***03/24/17***	**Page 7 of 22**

Step	Activity
	• Request a call back should there be any significant changes in the situation.
4	**INFORM** subsequent callers reporting the same emergency event that the Company is aware of the emergency and is taking steps to respond. **RECORD** any additional information provided by subsequent callers on *Form F.04 Initial Notification and create a MOCA for Lessons Learned/Table Top Exercises.*

NOTE: Acquire the following additional information to the extent possible or applicable when receiving notifications pertaining to emergencies.

- The name of the facility if known
- The number and size of pipelines or type of facility involved
- The current operating pressures and operating pressure ranges (MAOP)
- The nature of the event, such as:
  - Fire
  - Flammable liquid or gas escaping with or without a fire
  - Toxic or hazardous vapor cloud release
  - Trench collapse
  - Suspicious package
- The immediate threat to public safety
- The occurrence of injuries or fatalities

5	**LOCATE** the affected facilities on the pipeline and/or station schematics.
6	**EVALUATE** pressures upstream and downstream of the potential emergency location via SCADA.
7	**DETERMINE** whether an emergency exists. (Confirm with field personnel.) • If **YES**: – **GO TO** emergency response procedures. – **PRINT** SCADA screenshots and enter data into the *Daily Event Log.*

	• If **NO**: – **RETURN** to normal operations. – **ENTER** facts and data into the *Daily Event Log.*

7.3 Confirmation and Classification of the Emergency

Timely reporting is critical in initiating a proper response to an emergency situation and minimizing adverse consequences. Failure to report an event in a timely manner may adversely impact public safety, aggravate losses, jeopardize potential insurance coverage, and subject the company to adverse publicity.

Use the following process for reporting Events.

NOTE: According to Pipeline and Hazardous Material Safety Administration (PHMSA) advisory bulletin (PHMSA-2012-0201); pipeline operators should immediately and directly notify the Public Safety Access Point (local emergency responders) that serves the communities in which their pipelines are located when there are indications of a pipeline facility emergency. This notification is to alert the local responders regarding a potential emergency, or to see if the local emergency responders can assist the operator in confirming that an emergency has occurred.

Step	Activity
1	**IMMEDIATELY REPORT** all Class 1, 2, and 3 Events to the Operations Manager, and Discipline Director. For Class 2 and 3 Events that involve leaks, failures, or fires, also notify the appropriate Gas or Liquids Control Room Management. For classification of events see *SOP A.04*. The classification of an Event is based upon the level of potential or actual consequences. The ranking will be designated numerically, with "1" representing the least serious and “3” representing the most serious. • **Class 1**: These Events are identified as “Area Level” events and reported at least through the Director level and the appropriate Discipline Directors. Class 1 Events involve:

Step	Activity
	o First aid injury or high-potential near miss. o Company property damage or environmental release involving remediation estimated to cost less than $10,000. o Vehicle Events involving an employee that does not result in Class 2 or 3 consequences. o High potential near miss events with potential to generate Class 1, 2, or 3 consequences. • **Class 2**: These Events are identified as "Area / Regional Level" events and reported at least through the Operations Vice President level and appropriate Discipline Directors. Class 2 Events involve: o OSHA recordable injury to an employee or third party. o Company or third party property damage/loss or environmental release involving remediation estimated to cost in excess of $10,000, but less than $50,000. o Significant Leaks, fires or failures which are immediately controlled, contained, or extinguished, but have the potential to generate Class 2 consequences (> $10,000). o Spills and releases (including air emissions) that exceed thresholds defined in Environmental Manual - Reporting Spills and Releases. • **Class 3**: These Events are identified as "Corporate Level" events, and will be reported through the Executive Vice President level. Class 3 Events involve: o A death or personal injury necessitating in-patient hospitalization. o Significant events that are reportable to regulatory agencies. o Significant events requiring notification to law enforcement, emergency response agency or a public safety official and/or having offsite impacts which have the potential to generate significant media attention (proximity to metropolitan areas, evacuation of buildings, traffic diversions, etc.). o Company or third party property damage/loss or environmental release which requires remediation estimated to exceed $50,000.

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Step	Activity
	Significant leaks, failures or fires, which cannot be immediately controlled, contained, or extinguished.
2	**IMMEDIATELY REPORT** all incidents that may impact the public to Local operations personnel and the appropriate local emergency response agency(s). **CLARIFY** whether local personnel will make the 9-1-1 notification or whether the control room personnel will make the notification.

NOTE: This immediate notification by phone must be made to one of the following:

- Intrastate Regulatory Compliance Director, Danny Nichols [redacted]
- Interstate Regulatory Compliance Director, Nathan Hlavaty [redacted]
- Safety Director, Mark Milliken [redacted].

Any one of the three will suffice for immediate notification of Pipeline Incidents as defined by PHMSA. This notification must be immediately because one of these Directors or their staff will make required notification to the National Response Center and/or the appropriate State Agency within 1 hour of the confirmed discovery. Also notify Director of Regulatory Compliance if there is a revision or confirmation of initial notification within 48 hours of the confirmed discovery of the accident or incident.

3	**INCLUDE** the following information in the initial report: • The fact that an Event has occurred • Who was involved • What occurred • What extent of personal injury or property damage • When and where it occurred • What equipment is believed to be involved • Whether there is any media involvement

Step	Activity

4	For incidents or Class 3 Events, the Gas or Liquids Control group determines whether to **NOTIFY** the following departments via the Everbridge system: • Regulatory Compliance • Operations • Technical Services • Safety • Environmental The Safety Director or other Management Representative **INITIATES** the Corporate Emergency Management Plan, if required, and **VERIFIES** that the appropriate notifications are made.

NOTE: The Division or Department VP develops and distributes a local procedure with contact numbers for reporting emergency Events meeting the intent of this SOP. Refer to *SOP A.08 Field Emergency Response Procedures*.

Step	Activity
5	Control Room Manager **DETERMINES** if the Controller(s) on duty for the pipeline system the emergency occurred, are required to take drug and alcohol tests. **DOCUMENT** the criteria used to make decisions about conducting post-accident drug and alcohol tests and keep for at least 3 years a record of the reason why post-accident drug and alcohol tests were not conducted. See form F.05 Incident Review.

NOTE: DOT Post-Accident Drug & Alcohol Testing Kits are available in the Human Resource (HR) department during regular business hours. The kits are also located in Control Room for tests required after regular business hours.

DRUG TEST CALL OUT – Contact Pipeline Testing Consortium at 1-(800) 421-3674 or (620) 727-0063 for tests required after hours (Account #8143000). Drug/Alcohol tests should be administered to all controllers on duty for the pipeline system the incident occurred, especially if a rupture occurred. If there is uncertainty whether to administer drug/alcohol testing, notify a Regulatory Compliance Director.

Alcohol test specimens are required within 2 hours and a drug test specimen is required within 8 hours.

7.4 Emergency Response Procedure

This Procedure describes the minimum actions that the Controller must follow during an actual emergency. This procedure takes precedence after the confirmation of an actual emergency.

Step	Activity
1	**RECORD** all pertinent information associated with the emergency.
2	**ADJUST** pipeline operation via SCADA to assist in isolating the emergency situation.
3	**DETERMINE** the configuration necessary to isolate the affected pipeline section.
4	**COORDINATE** with field personnel the safest and most expeditious method to isolate the affected section.

NOTE: Control Room and field personnel must agree on all valve positions prior to operating valves.

5	**ADJUST** the pipeline system accordingly to account for the isolated section.
6	**NOTIFY** all customers impacted by the emergency and request their assistance.

7	**RESUME** normal pipeline operation under the new system configuration.
8	**COMPILE** all data captured throughout the emergency and **PREPARE** an "Incident" folder. **INCLUDE** all SCADA-printed "snapshots."

7.5 Media Response

Reporters and other media individuals have a legitimate right and even an obligation to the public to obtain correct information about emergency events.

It is the company's desire to address media inquiries with correct information. In order to do so, refer all inquiries to the Media Relations representative.

Step	Activity
1	**ADVISE** all inquiries that they have reached an emergency phone number and refer them to the appropriate Media Relations representative whose numbers are posted on the company internet website.
2	**ADVISE** the caller that the Media Relations representative will be the Company contact for any further information.

7.6 Post Emergency Response Operations

Following completion of the emergency phase of the response, transition is made to gather pressure logs and SCADA data.

7.7 Restoration of Service

Restore service as quickly as practical following isolation, control and repair of any emergency that interrupts service. General procedures for responding to any service outage are as follows.

Step	Activity
1	**CONTACT** the Area Office or Control Room Management with the following information: • A description of the situation • The location of the service outage • An assessment of whether company personnel can handle the situation • A request for what assistance is needed
2	**DISPATCH** the required personnel to complete any required repairs.
3	**NOTIFY** any affected distribution companies or other customers. **COORDINATE** any required service restoration efforts with them to avoid the potential of supplying gas to customers whose pilots have not been relit.
4	**CONSULT** the appropriate section of the emergency procedures for notification requirements.
5	Where service is provided directly to an end user (e.g., a farm tap without an intermediate distribution company), **NOTIFY** the affected customer and **ADVISE** them: • Why their service has been interrupted. • Their service will be restored as soon as possible. • If the outage persists they will be called back.

Step	Activity
	• They will be notified when service is to be restored.
6	After necessary repairs have been completed and company facilities are back in service, **RESTORE** service to all customers.

7.8 Guidelines for Reporting an MAOP Exceedance

The following process is used to identify and report potential MAOP Exceedance.

Step	Activity
1	**COMMUNICATE** with field personnel and gather details regarding the event. MAOP Exceedance occurs when a pipeline facility exceeds the Maximum Allowable Operating Pressure plus build-up allowed for operation of pressure-limiting or control devices.

7.9 Field Location Security Breach

This section discusses the procedures for handling unauthorized visitors at a field location site.

Step	Activity
1	**RECEIVE** alarm / notification.
2	**CONTACT** Field Personnel and/or Safety & Security Personnel.
3	If you **RECEIVE** a verbal notification from field operations mentioning an operating pressure of 1575 psig, **NOTIFY** Safety & Security Personnel. See Security *SOP* A.23 *Facility Security*.

7.10 IT SCADA Security Breach

This section discusses the procedures for handling unauthorized hacking of the IT SCADA system.

Step	Activity
1	**RECEIVE** alarm/ **DETECT** unusual SCADA activity.
2	**CONTACT** IT SCADA Personnel.
3	**CONTACT** Safety & Security Personnel.
4	**CONTACT** Operations Personnel to possibly implement the manual operation procedures.

7.11 Control Room Security Breach

This section discusses the procedures for handling unauthorized visitors in the control room.

Step	Activity
1	**DETERMINE** unauthorized visitors identity if possible.
2	**NOTIFY** Control Room Supervisor/Manager if possible.
3	**NOTIFY** Safety & Security Personnel if possible. **CALL** 9-1-1 if necessary.
4	**CONTACT** Operations Personnel to possibly implement the manual operation procedures.

7.12 Emergency Simulation Drills

This section discusses the procedures for handling Emergency Simulation Drills.

Step	Activity
1	**PARTICIPATE** with field operations in emergency simulation drills.
2	**RECORD** Control Room evaluation in Form F.04 Initial Notification.
3	**OBSERVE** and **VERIFY** the following activities: • Proper notification of emergency response agencies, if involved • Response times to the incident, location and valve sites • Proper notification of incident and communication with company personnel • Knowledge of Area personnel of their required response actions • Availability of personnel and equipment to respond • Adherence to the current Control Room Emergency Procedures • Adequacy of the current list of producers and delivery customer contact numbers • Monitoring of pipeline pressures at nearby compressor stations or other facilities • Other activities deemed significant

7.13 Emergency Response Review

Perform a review of all emergency response incidents for the purpose of determining the effectiveness of procedures and the Emergency Response Plan. Evaluate the response of company personnel to determine training is effective and compliance with procedures and their effectiveness after each emergency or incident. Initiate any required changes to procedures or the Emergency Response Plan using *Form F.04 Initial Notification.*

7.14 Incident Reporting

An incident is defined as a release of gas or product from a regulated pipeline meeting the criteria set forth in section 7.3 of this SOP.

Step	Activity
1	If an event is determined to be an incident, operators are required to **COMPLETE** and **SUBMIT** *PHMSA F7100.2* not more than 30 days after detection of the Incident.
2	Control Room Management **PROVIDE**S required information for CRM incident reporting data to the Regulatory Compliance Department.

8.0 Documentation Requirements

F.04 Initial Notification MOCA

F.05 Incident Review

9.0 References

A.15 PHMSA/States - Incident Reporting

Appendix A: OQ Task Table

The table below identifies the Operator Qualification (OQ) task requirements.

Task Description	OQ Task
Emergency Response	CROQ003

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Appendix B:

Flowcharts

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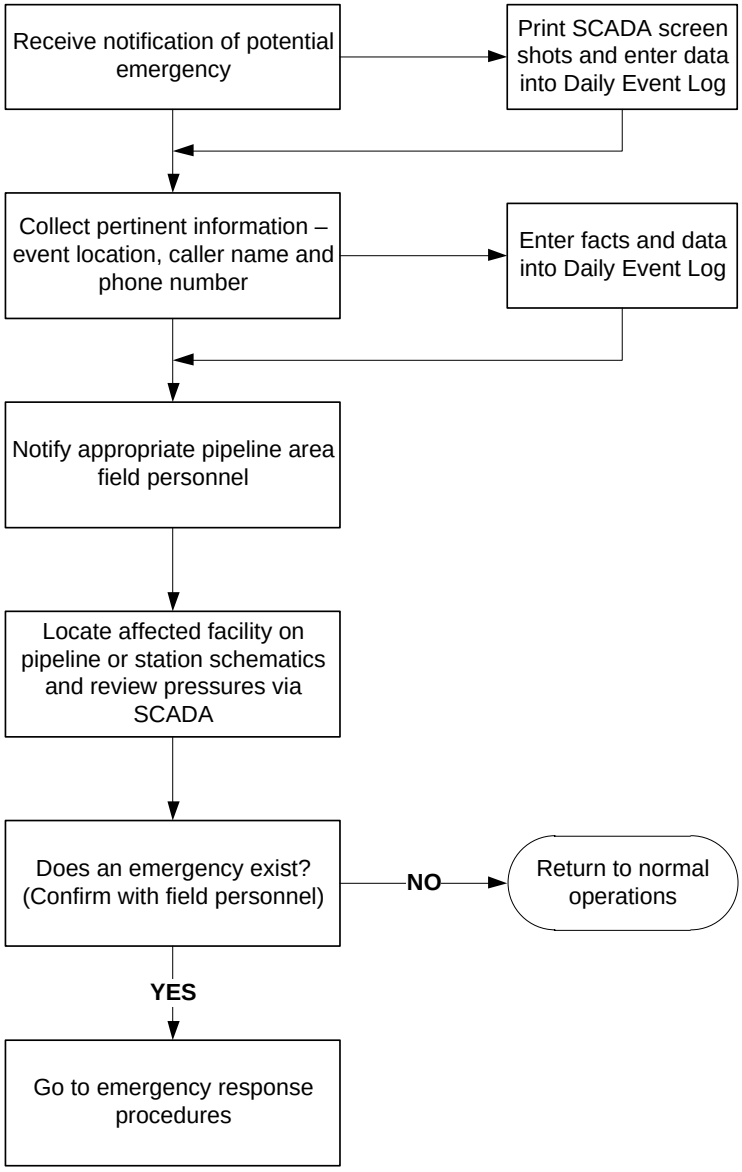
Initial Notification of Potential Emergency



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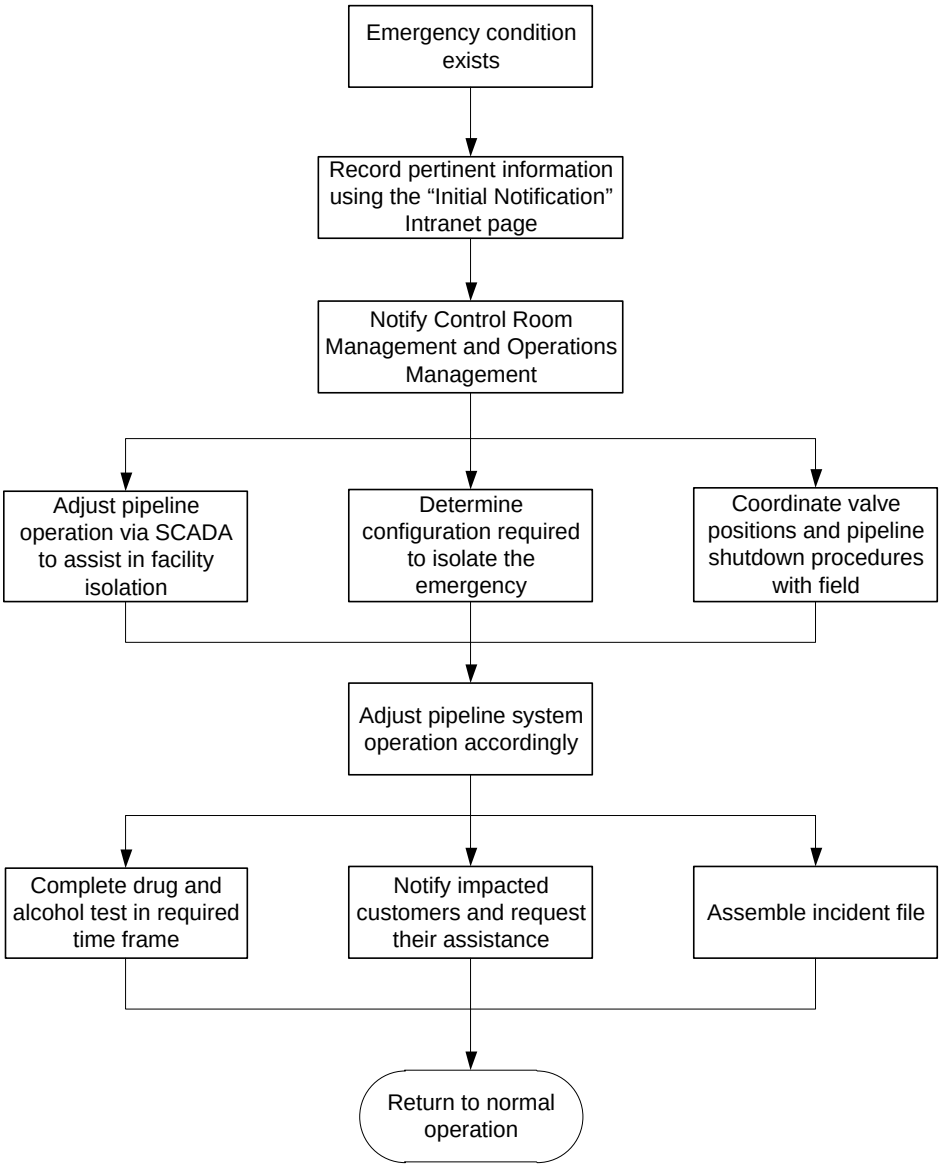
Control Room Procedures
Emergency Response



Control Center Incoming Call Procedure

Table of Contents

Section 1 - Overview

General

Since the ETP Control Centers in Montello, PA and Sugar Land, TX are manned 24/7/365, they are a primary point of contact for incoming calls from the public. Typically, these calls are received on the "800 Emergency" number, although they can be received on any of the incoming telephone lines.

The purpose of these calls varies greatly some are to report odors, possible leaks, and right-of-way concerns, while others may be nuisance calls concerning, for example, ETP credit card problems or issues concerning ETP Service Stations.

Pipeline Controllers (PCs) are responsible for fielding and directing incoming calls in a timely, professional manner.

Purpose

This procedure provides specific guidance for handling of incoming phone calls, especially those related to reports of potential releases from the pipelines or other ETP facilities.

WARNING: PCs must respond quickly and professionally to all incoming calls. Failure to take appropriate actions in response to reported leaks or potential leaks could result in serious safety, environmental and/or legal consequences.

CAUTION: Portions of this procedure contain instructions for dealing with potential emergency situations. All Control Center personnel must be familiar with these procedures **before** an actual emergency occurs. Take time to regularly review pertinent emergency procedures.

Scope

This document details the Control Center-specific responsibilities with regard to incoming calls, and is intended to supplement the ETP Pipeline's Standardized Procedure for Investigating Reports of Potential Pipeline Releases.

Section 2 - Incoming Call General Guidelines

2.1. Types of Incoming Calls

Emergencies and Potential Leaks

These are the highest priority calls and are typically received on the "800" emergency number. Incoming calls involving reports of strong odors, dead vegetation, visible product, fire, explosions, etc fall into this category.

Step	Activity
1	Immediate action is required, quickly **IDENTIFY** and **SHUT DOWN** the line(s) in question
2	**NOTIFY** the appropriate ETP personnel to muster a response
3	**COMPLETE** the Incoming Call Form

Pipeline Damage

Reports of pipeline damage will require a shutdown until field personnel can complete a full assessment of the damage.

Reports of pipeline damage require completion of the Incoming Call Form.

Feedback from the regional Maintenance/Operational Supervisor (or responding ETP personnel) and the on-duty Manager – Control Center (MCC) will be required before deciding to re-start the line segment.

WARNING: Information being reported to the CC may not be entirely accurate or complete; it may or may not agree with current SCADA/LeakWarn data. Regardless, PCs should take all calls for reported or possible leaks very seriously and if there is any doubt, shutdown the affected lines until the situation can be investigated further.

Damage to Pipeline Fixtures

This category includes damage to fixtures and appurtenances located on the pipeline right-of-way. A typical call, for example, might report a damaged pipeline marker resulting from vehicle accidents, snow plowing, vandalism, etc. Damage that is limited to pipeline fixtures shall be referred to the regional Maintenance/Operational Supervisor; however, an Incoming Call Form is not required.

NOTE: Reports of damage to pipeline markers may mention "exposed wires." In fact, some pipeline markers have wire leads attached for pipe location and corrosion monitoring. These leads are not under load, and pose no significant hazard.

Right-of-Way (ROW) Issues	Calls relating to ROW issues (e.g., easement concerns, cutting crew issues, etc) shall be directed to the ROW Office in either Montello or Sugarland; an Incoming Call Form is not required. • The ROW number for Sugar Land is 281-637-6283. After hours emergency calls shall be directed to James Paradise at [redacted] (cell). • The ROW number for Montello is 610-670-3322.
One-Call Issues	Issues involving digging or construction along the ROW (including emergencies) must be immediately reported to the One Call Office during business hours or the regional Maintenance/Operational Supervisor during off-hours. An Incoming Call Form is not required for One-Call issues. • The phone number for One-Call Issues is 610-670-3260.
Non-Pipeline Calls	An Incoming Call Form is not required for non-pipeline calls: • SUNOCO Customer Service – calls may be received relating to SUNOCO credit cards and service stations. The PC will provide these callers with the appropriate SUNOCO Customer Service phone numbers. The general Customer Service phone number for SUNOCO is 1-800-786-6261. • Information Requests – may include calls regarding SXL facilities and employees, including employment verification inquiries. o The PC will provide these callers with the appropriate Human Resources (HR) phone number. o For more information concerning HR-related issues, follow this hyperlink: HR Links.
Information Inquiries	All requests for information by the news media, government officials, and/or other interested third parties shall be directed an approved media representative. • Please refer to Paragraph III.B.14 for details. • PCs shall not release or speculate on any incident or Company-specific information to parties or persons outside the Control Center. • Incident or Company-specific information shall only be discussed with other SXL employees on a “need to know” basis. Contact the on-duty MCC/LPC for additional guidance, if necessary. • Telemarketer Calls – Telemarketer calls are essentially a nuisance for the PC; however, an automated recording may contain instructions for

removal from the call list. The PC should therefore listen to the message (time permitting) and follow the instructions for removal from the call list.

- All Others: There are many other possible incoming call types, and the PC must use good judgment when directing calls or taking action. All calls shall be handled in a courteous, professional manner.

2.2. Sources of Incoming Calls

1. Home Owners and the General Public
2. Emergency Responders
3. Third-Party Customers
4. Utility Company Crews
5. Contractors
6. Government Agencies
7. State/Municipal Maintenance Crews
8. News Media Agencies
9. Telemarketers

2.3. General Guidelines for Answering Incoming Calls

1. The PC should always be polite, professional, and express concern to the caller; remember that you are interacting with outside parties on SXL's behalf
2. Always identify the Company, yourself, and the fact that you are answering the Emergency Line.
    - Example: "ETP Emergency Line, this is {your first name}, what is your emergency?" Refer to Appendix A for typical responses when answering the Emergency Line.
3. It is important to quickly determine the reason for the call. If the nature of the call involves a potential pipeline emergency, such as a leak, identify the location immediately and notify the responsible PC to shut down, if necessary.

NOTE: Per the ETP Control Room Management (CRM) Program:

"The Pipeline Controller should always err on the side of safety anytime they see abnormal operating data that provides the PC with a clear indication of a release, and anytime they have reports from the field of a release associated with our pipeline. The Pipeline Controller is directed to shut down any systems which have been reported to have a leak, or which are reported to be a source of a release, when that report is based on a credible report from the field or when based on operations data accessed via SCADA or via the leak monitoring system. Also, based solely on his/her judgment, the Pipeline Controller has full authority to shut down a pipeline, facility/station or any segment of a pipeline without soliciting permission from management if he/she deems it to be the appropriate action based on his/her responsibility to protect the public, the environment and company interests." Additional information concerning the Roles and Responsibilities of a Pipeline Controller can be found here: CRM Roles and Responsibilities Policy

4. If the call triggers a line segment shut down for safety reasons, the PC shall immediately contact the on-duty MCC and fill out an Incoming Call Form.
5. If applicable, tell the caller when they can expect a return phone call and from whom.
6. If applicable, transfer the call to the appropriate department, but make sure the call is answered by the receiving department (during normal business hours).

Control Center Incoming Call Procedure

Section 3 - Control Center Incoming Call Procedure

General

The flowchart shown in Figure 1 can be used to determine the proper routing and actions required for incoming calls. Additional information can be found by referring to the paragraph references shown in RED text. Figure 2 provides a quick summary of the different call types and the general actions required.

NOTE: The Montello Control Center (MCC) may begin receiving incoming calls regarding the MAGTEX Pipelines (located in Texas). MCC PCs should follow these procedures and make the necessary notifications to one of the three "Area Supervisors" for the MAGTEX Pipelines, as required. For the purposes of this procedure, the term "Maintenance Supervisor" is interchangeable with "Area/Operational Supervisor."

Procedure

For any incoming call, the first step is to determine if the call pertains to an SPL pipeline, which includes all SXL facilities, property, fixtures, and appurtenances. If the answer is YES, proceed to the next paragraph. If not, proceed to Paragraph III.B.12. For any incoming calls from the News Media, proceed directly to Paragraph III.B.14.

For calls concerning an SPL pipeline, facility, fixture, or appurtenance, quickly determine if the call involves an emergency (e.g., active leak, fire, explosion, etc), a possible leak (e.g., odors, hissing, dead vegetation, etc), or major damage to some part of the physical pipeline (e.g., a washout that has left a large segment of pipe exposed and unsupported, a line has been "dinged" by a contractor, etc). If so, proceed immediately to the next paragraph. If not, proceed to Paragraph III.B.4.

If the caller confirms an active leak, as indicated by physical product on the ground, product spraying from the pipeline, active vapor cloud from the pipeline, fire or explosion, immediately accomplish the following as quickly as possible:

- Verify that the caller has notified the local public emergency services (i.e., the local "911" agency) AND obtain a number where the caller can be reached in the next 5-15 minutes.
- Regardless of the answer, instruct them to evacuate the area.
    - The caller should notify the local "911" emergency services when it is safe to do so (if this hasn't been done already);
    - Ask the caller if there are any injuries or casualties;
    - Ask the caller if the extent of the incident is known (e.g., is the incident in rural or residential area, near an industrial area, near a waterway, etc.);

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- Provide the caller with the evacuation instructions provided in Appendix B.

WARNING: Although notification to local emergency services is critical, especially to help secure/evacuate the potential incident area, the PC must obtain as much information as possible before terminating the call. At a minimum, the PC must at least get a call-back number and approximate incident location. Without this information, the SXL response may be delayed.

NOTE: "Physical product on the ground" means a measurable amount of product to the eye, which does not include a sheen. A reported sheen may indicate a leak, however, it warrants further confirmation by field personnel, or some other circumstances included in the caller's report that would tie it to an active leak.

- Based on the available information, determine the location of the incident, and have the responsible PC shutdown the affected line segment(s) without pressure. Refer to the appropriate shutdown procedure(s) for additional details.

CAUTION: Software applications, such as *DSS* and *Google™ Earth*, are available to help locate a potential incident site. Do not delay contacting the regional Maintenance Supervisor while attempting to find the specific location: these individuals are typically very familiar with their areas of responsibility, and may be able to readily identify the potential incident location.

NOTE: Appendix C of this document provides instruction on how to setup and use the Google™ Earth application.

- Immediately notify the regional Maintenance/Operational Supervisor (or designee), being sure to relay as much information as possible, including the status of notification to the local public emergency services.
- If the local "911" emergency services have not been otherwise notified, make the notification using the Public-Safety Answering Point (PSAP) information found on the PSAP Layer in DSS.

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CAUTION: DO NOT simply call "911" from the Console phone unless the incident is located in Berks County (for the Montello Control Center) or Fort Bend County (for the Sugar Land Control Center). Be certain to use the appropriate PSAP number for incident location.

NOTE: The PSAP layer can be activated in DSS by first clicking on the "Layers" tool and then placing a check in the box next to the "PSAP" layer at the bottom of the list. The specific PSAP number can be determined by first selecting the "Identify" tool and then clicking on the map near the incident location. The data box will automatically populate with the County name and PSAP number.

NOTE: The PSAP Layer is not available on Google™ Earth.

- Complete an Incoming Call Form, being sure to record the phone number from the caller where they can be reached in the next 5-15 minutes. Refer to Section IV for instructions on how to complete and distribute the Incoming Call Form.
- Notify the on-duty MCC, and monitor the situation as required.

For non-emergency calls involving an SPL pipeline, facility, fixture, or appurtenance, determine if the call involves a possible leak (e.g., odors, hissing, dead vegetation, etc), or major damage to some part of the physical pipeline. If so, proceed immediately to the next paragraph. If not, proceed to Paragraph III.B.6.

For calls pertaining to potential leak scenarios or if the pipeline has been physically damaged, take the following actions:

- Shut down the affected line segment(s) without pressure. Refer to the appropriate Control Center procedure(s) for additional details.
- Notify the regional Operational/Maintenance Supervisor, being sure to relay as much information as possible.
- Based on the Operational/Maintenance Supervisor's assessment, or on information reported back from responding field personnel, it may be possible to re-start the pipeline. The pipeline shall not be re-started until after the Operational/Maintenance Supervisor's assessment has been completed.
- Complete an Incoming Call Form, being sure to get a phone number from the caller where they can be reached in the next 5-15 minutes.

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Refer to Section IV for instructions on how to complete and distribute the Incoming Call Form.

- Notify the on-duty MCC, and monitor the situation as required.

Determine if the non-emergency call concerns damage that is limited to SPL pipeline property, fixtures, or appurtenances (e.g., damaged/missing markers, vehicles on the ROW, minor washouts, etc). In this case, the call does not involve damage to the physical pipeline and there is no indication of a potential leak. If so, proceed to the next paragraph. If not, proceed to Paragraph III.B.8.

For reports of damage limited to pipeline property, fixtures, or appurtenances (i.e., non-emergency, no leak indicated, no major damage), the PC shall:

- Determine the exact location of the incident, and have the responsible PC closely monitor the appropriate leak detection system (e.g., LeakWarn, Overs/Shorts Report, etc.) and SCADA for the identified line segment(s). If necessary, shut down the line segment if available data suggests an abnormality.
- Notify the regional Operational/Maintenance Supervisor verbally and by email. Be sure to include as much information as possible, including an exact location and description of the issue.

NOTE: During non-business hours, it is not necessary to verbally notify the Operational/Maintenance Supervisor, unless the caller specifically requests a call back. For example, a police officer at the scene of an accident that has damaged a pipeline marker is concerned about exposed "wires," and wants to speak with an SXL representative.

- An Incoming Call Form is NOT required for incidents of this type, unless specifically requested by the Maintenance Supervisor.
- Send a copy of the email to the MCCs.

Determine if the non-emergency call involves a Right-of-Way (e.g., easement issues, cutting crew issues, general questions, etc) or One-Call (e.g., work crews ready to dig, emergency dig requests, etc) issue. For ROW-related issues, proceed to the next paragraph; for One-Call issues, proceed to Paragraph III.B.10; for all other SPL pipeline-related issues proceed to Paragraph III.B.11.

For issues involving the Right-of-Way, the PC will:

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- For calls regarding an Eastern Area Pipeline, forward the call to the primary ROW agent, Connie Chadwick at [redacted]. During normal business hours, the PC should make sure that the call is answered.
- For calls specific to the Western area or MAGTEX Pipelines, provide the caller with phone number to the primary Sugarland ROW agent, Sa'Mara Scott, at [redacted]. After hours emergency calls shall be directed to James Paradise at [redacted] (cell).
- An Incoming Call Form is NOT required for ROW issues.

For issues involving One Calls, the PC will:

- Verify if personnel are on-site and ready to dig. If so, instruct them to wait – they may not to begin digging unless an SXL representative is on location.
- For calls received during 0700 to 1700 EST, forward the call to the One Call Center at 610-670-3260. The PC should make sure that the call is answered.
- For off-hours digging requests (including emergencies):
    - Obtain a point-of-contact name and phone number where the person can be reached in the next five (5) to fifteen (15) minutes.
    - Immediately notify the regional Operational/Maintenance Supervisor.
    - For any off-hours calls, document the event with an email to the Operational/Maintenance Supervisor, MCCs, and One-Call personnel.
- An Incoming Call Form is NOT required for One Call issues.

For any other SXL-related issue, the PC shall direct the call as required. Administrative Assistants may be able to provide additional assistance during normal business hours.

Determine if the nature of the call pertains to SUNOCO proper, which includes issues concerning SUNOCO gas cards, service stations, general customer service, and employee issues. If so, direct the caller as follows:

- For issues requiring the general assistance of SUNOCO customer service, the number is 1-800-SUNOCO1 (1-800-786-6261).

Control Center Incoming Call Procedure

NOTE: The customer service number above can direct the caller as needed for any SUNOCO issue. With the exception of calls from the media, the additional numbers below can be offered to callers if the PC has time to determine the exact nature of the call (optional).

- For issues pertaining to SUNOCO credit cards, the number is 1-800-278-6626.
- If the caller is trying to reach a particular SUNOCO employee, have them call the Mellon Bank Building at 1-215-977-3000.
- For questions concerning employment verification, the number is 1-800-367-5690.
- For SUNOCO Home Heating Services inquiries, direct the caller to 1-800-627-HEAT (1-800-627-4328).
- For calls from the News Media, proceed to Paragraph III.B.14. If the issue is not related to SUNOCO, proceed to the next step.

For all other non-pipeline, non-SUNOCO related calls, the PC should take action as required:

- As a direct representative for the company, it is important for the PC to exercise good judgment and remain professional when assisting callers. Politely direct the caller to the appropriate source of assistance, whenever possible, before terminating the call.
- Regarding telemarketer calls, the PC should (time permitting) listen to the entire message before hanging up since pre-recorded solicitation calls often contain instructions for removing the called number from the automated call list. Whenever possible, the PC should follow these instructions to help prevent future nuisance telemarketing calls.

Information Inquiries: For all inquiries by a Reporter or News Media (or other interested third-parties/individuals), refer the caller to the ETP/SUNOCO/SXL Media Representative:

- Table of Media Representative Contacts

Type	Name	Office	Cell Phone
Primary Contact	Jeff Shields	[redacted]	[redacted]
Secondary Contact	Vicki Granado	[redacted]	[redacted]
Third Contact	Lisa Dillinger	[redacted]	[redacted]

Control Center Incoming Call Procedure

- The numbers above may be released to the caller.
- The term "media" shall include, but is not limited to, television, radio, newspapers, magazines, internet, social media, or telephone.
- It is SXL Policy that all calls or requests from the media be handled by one of the Company's designated media and/or investor relations representatives in order to control the accuracy and consistency of public statements made by the Company.
- When responding to information inquiries, a PC shall inform the caller that he/she is not the correct person to handle their question. The caller shall then be directed to the appropriate person listed above.
    - Example response #1 – general information inquiry: "I am not the person who can help you, but I can get you in touch with someone who can."
    - Example response #2 – incident inquiry: "I am not the appropriate person for you to speak with, but company management has been contacted and a Company spokesperson will be made available shortly."
- PCs shall keep in mind the following:
    - No one, other than approved media and/or investor relations representatives may talk to a reporter.
    - Do not answer any of their questions, provide any employee names or numbers (except for the approved media contacts), and do not engage in any kind of conversation.
    - If a reporter continues to try to ask questions, you must continue to tell him or her that you are not the appropriate person for them to speak to.

NOTE: Unless directed otherwise, never release cellular or home phone numbers to anyone calling for information (other than from table above). If necessary, the PC should ask for a call-back number, contact the SXL employee directly, and provide them with the original caller's name and number.

Section 4 - Incoming Call Form Instructions

General

When required, the PC shall complete and distribute an Incoming Call Form. A sample form is shown in Figure 3.

NOTE: It may be easier to fill in a blank, paper copy of the form while speaking with the caller. The information can then be transferred to the electronic form after the call has been terminated and all notifications have been made. Blank copies of the Incoming Call Form are kept at the consoles.

Procedure

1. Always use a new form for each incoming call.
2. The PC shall complete the form as follows:
    a. Caller's Name, Category, Time and Date – all self-explanatory; be sure to check off the proper Category for the call (e.g., Employee, Fire, Police, Excavator, or "N/A"). For on-site contractors who are ready to dig, select "Excavator," and for all other callers, including homeowners, select "N/A."

NOTE: The Right-of-Way (ROW) department is required to track all incoming calls; selecting the proper category is necessary to properly perform this task.

    b. Have they called before? – If yes, then record in the comments section the nature of the previously reported issue.
    c. Home / Office Phone# - ask if the person will be at this number for the next 5-15 minutes.
    d. Cell Phone # – ask if the person will be at this number for the next 5 to 15 minutes.
    e. Caller's Address, State, Zip Code, County, and Township – This is the address where the caller lives, not necessarily the area of the potential issue.
    f. Nearest Community, Nearest Street/Road, and Nearest Intersection or Other Location Information – these all pertain to the location of the potential incident; the PC should get detailed information.
        i. For Oklahoma: ¼ _____Section _____Township_____ Range_____.

g. What was reported? – Record as much information as possible using the section prompts as a guide. Do not speculate, and record only known information.
h. Name of Any Streams or Rivers in the Area – this is important information, especially if released product has entered, or could possibly enter, nearby waterways.
i. Have any agencies been notified? - This would include local emergency responders, other service providers (gas company, other pipeline operators, etc), and/or government organizations (e.g., the Department of Environmental Protection).
j. Which Region (1, 2, 3, etc) is Involved? – The PC will determine this information using one of the mapping resources (e.g., Google™ Earth). Once the location is identified, the proper Maintenance Supervisor can be contacted.

NOTE: The MAGTEX pipeline system is a separate region with three (3) Area Supervisors. The Console #5 PC has specific information regarding the Area Supervisors and their respective coverage areas.

k. Who was contacted to investigate report: - This will normally be the regional Maintenance Supervisor (or designee). Be sure to record the date and time of the notification.

l. Narrative of Actions Taken by Product Movement Personnel or Person taking report: - Be sure to describe any specific actions taken by the Control Center in response to the call (e.g., shut down a line segment, advised responsible PC to monitor his/her line closely, etc).

m. The rest of the form will be completed by the Operational/Maintenance Supervisor or other responding personnel.

3. Once the call has been completed and all notifications have been made, the PC should transfer this information to a new, electronic Incoming Call Form (if this hasn't been done already). Simply "Open" a blank form using Microsoft® Word©.

NOTE: The master electronic copy of the Incoming Call Form can be found in the Document Repository as follows:

Control Center Tools: Document Library: Control Center Common Files: Normal, Abnormal & Emergency Procedures:

This document can also be accessed from the Emergency Section of the Montello Control Center Desktop web application.

4. After completing the electronic form, select "File, Save As…," and save the file to the local desktop (or other location) in the following format:
   a. ZZZZZ_MM-DD-YY.doc
   b. Where ZZZZZ is the zip code of incident location and MM-DD-YY is the reported date in abbreviated, two-digit month, day, and year format.
5. Prepare an email, attach the newly created file, and send it to the Operational/Maintenance Supervisor; be sure to copy the MCCs/LPCs and Console(s). If necessary, include any other important information in the body of the email.
6. Field personnel will investigate the issue and report back to the Control Center with their findings.
7. The Operational/Maintenance Supervisor (or field personnel) will complete the remaining sections of the Incoming Call Form and return to the appropriate Control Center.
   a. A MCC/LPC will review the completed form and then file it in the Document Repository for future reference.

Section 5 - Review Log

Review Date	Document Reviewer	Review Type	Review Details
11/13/2017	MCRM	Annual	New Template

RELEASE NOTIFICATION/RESPONSE FLOWCHART

ENERGY TRANSFER

- HAS THE SPILL ENTERED A STORM DRAIN?
- HAS THE SPILL CREATED A SHEEN ON WATER (in a ditch or a stream)?
- IS THE SPILL **GREATER THAN** THE REPORTABLE QUANTITY FOR HYDROCARBONS (review all State reporting requirements)?
- IS THE SPILL **OUTSIDE** OF CONTAINMENT?
- DOES THE SPILL **CONTAIN** A HAZARDOUS SUBSTANCE (Example METHANOL)?

Note: If answer is yes to any of the above, consider it a Major Spill.

NO

MINOR SPILL

- Causes little or no disturbance in the operations.
- No Agency communication is required.
- Notify Your Environmental Specialist.
- Operations completes Release Reporting Form and submits to Environmental Specialist.
- Operations will typically only require recommendations from Environmental to address the incident.

*If Operations decides to utilize a 3rd party environmental contractor to manage clean up, contact Environmental Specialist for guidance on Spill Response Contractors.

YES

MEDIUM SPILL

- Short term interruptions to operations
- Spill may be both recordable and reportable
- Environmental Specialist to manage agency reporting
- Environmental Specialist to assist operations to create a scope of work (Specialist may pass on to Third Party Environmental Project Manager)

LARGE SPILL

- Operations may experience short-term interruption or a complete shut down until the incident is resolved.
- Spill will always be reportable.
- Local Environmental Specialist will manage all reporting to the regulatory agency.
- These projects will typically be moved to the Emergency Response/Waste/ Remediation Group.

SPILL INTO SENSITIVE AREAS

- Releases that affect environmentally sensitive areas, impact landowners, create heightened scrutiny from public, cause damage to property, and/or have potential for litigation.
- Spills of any type and size and the amount released will always be reportable.
- Environmental Specialist will manage all reporting.to agencies.
- These projects will typically be moved to the Emergency Response/Waste/Remediation Group.

FIRST RESPONDER
(Person who finds the spill)

ENVIRONMENTAL SPECIALIST

SUPERVISOR
(Supervisor / Area Manager)
*If Operations hires a Response Contractor, notify your Environmental Specialist

LOCAL AUTHORITIES
(Fire, EMIS, Police)
(If Required)

DIRECTOR ENVIRONMENTAL

ENV REMEDIATION MGR

SPILL RESPONSE CONTRACTOR

SENIOR DIRECTOR, OPERATIONS

GAS/LIQUIDS CONTROL

REGULATORY AGENCY

(1)

40 square feet (5' x 8') on dry concrete = 1 Quart
140 square feet (10' x 14') on dry concrete = 1 Gallon
700 to 800 square feet (20' x 40') on dry concrete = 5 Gallons

NOTE:
This flow chart applies to LIQUID:
- releases on the ground
- releases on water

- All spills are to be immediately reported to the Environmental Specialist and recorded.
- Operations is responsible for all cleanups according to regulations.
- Environmental Dept. will assist to ensure that the scope of cleanup is in-line with regulatory expectations.
- Ensure Safety, ROW and Regulatory Departments are notified as needed.