



# ONEOK PARTNERS

December 18, 2012

Mr. David Barrett  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration  
901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

Re: Notice of Amendment  
ONEOK Partners Natural Gas Pipelines  
CPF 3-2012-1008M

Dear Mr. Barrett:

Pursuant to the Notice of Amendment CPF 3-2012-1008M dated September 14, 2012, ONEOK Partners-Natural Gas Pipelines (NGP) respectfully submits the following response to the issues brought forth from the inspection of ONEOK Partners Public Awareness Plan (Plan) and records in Tulsa, Oklahoma during October 11-13, 2011.

The Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Amendment for six items as noted below.

**1. §192.615 Emergency Plans.**

***(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:***

- (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;***
- (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;***
- (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and***
- (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.***

***ONEOK's procedures are inadequate because they do not delineate a process to ensure effective liaison with emergency responders, including the sharing of capabilities and its emergency response plan.***

ONEOK Partners NGP Response:

The ONEOK Partners operating procedure OKSops3.080.415 – Liaison with Fire, Police and other Public Officials was revised to describe the various types of emergencies and the need to communicate to emergency officials, response plans for the following types of emergencies:

- Gas detected inside or near a building
- Fire located near or directly involving a pipeline
- Explosion occurring near or directly involving a pipeline
- Natural disaster

The procedure also clarifies the process used to communicate with the emergency responder and the requirement to determine the responsibilities of each organization and resources each organization has available that may assist the Company in an emergency response.

A copy of the ONEOK Partners operating procedure OKSops3.080.415 – Liaison with Fire, Police and other Public Officials is attached for review.

**2. §192.616(a) Public Awareness.**

**(a) Each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, see §195.3).**

**ONEOK's procedures are inadequate because section 7.1 of its Public Awareness Plan does not identify the individual public awareness coordinators by name and title and the plan does not include an executive signature on the statement of management support.**

ONEOK Partners NGP Response:

ONEOK Partners has amended section 3.0 of the Plan to include the names and titles of the Technical team members and the public awareness coordinators. The executive signature on the statement of management support was added on page (i) of the Plan.

**ONEOK's procedures are inadequate because section 8.1 of its Public Awareness Plan does not clearly define the process for identifying the emergency responder stakeholder audience.**

ONEOK Partners NGP Response:

ONEOK Partners has amended section 8.0 of the Plan to clarify use of company operating procedures to define the company requirements for communicating to emergency response agencies.

Section 8.1 of the Plan was revised to define the process for identifying the emergency responder stakeholder audience. The area of coverage will include emergency official agencies with jurisdiction along the pipeline route where ONEOK Partners pipelines are operated that might reasonably be expected to respond to a ONEOK Partners pipeline incident.

**ONEOK's procedures are inadequate because its Public Awareness Plan does not define when an additional buffer is necessary for identifying each stakeholder audience.**

ONEOK Partners NGP Response:

ONEOK Partners has amended section 5.1 of the Plan to clarify the process used to define the area of coverage for the affected public. As stated in the Plan, the area of coverage will use IMP diversion models for liquid pipelines and Potential Impact Radius (PIR) for natural gas pipelines.

The identification process for excavators will use the state one-call list and business addresses within a 10 mile buffer zone on either side of the pipeline with those SIC codes listed within the Plan.

The identification process for emergency officials will include emergency official agencies with jurisdiction along the pipeline route where ONEOK Partners pipelines are operated that might reasonably be expected to respond to a ONEOK Partners pipeline incident.

The area of coverage for public officials remains unchanged and include officials whose jurisdiction is in the covered counties or adjacent to the ONEOK Partners operated pipelines.

**3. §192.616(c) Public Awareness**

**(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practices is not practicable and not necessary for safety.**

**ONEOK's procedures are inadequate because its Public Awareness Plan does not include a process for developing new individual stakeholder audience brochures or making changes to the brochures that specifies when and how the pretesting of changes, including the use of focus groups, will be conducted.**

ONEOK Partners NGP Response:

ONEOK has amended section 12.2.2 of the Plan to clarify the use of surveys to determine the effectiveness of the stakeholder brochures and to help understand if changes to the brochures are necessary, based on the results of the survey.

ONEOK has amended section 12.2.1 of the Plan to clarify the use of focus groups, and describes the dialogue to be used to determine the comprehension and understanding of the brochures by the focus group participants.

**ONEOK's procedures are inadequate because its Public Awareness Plan does not include a process to ensure that each area of the system is conducting an annual supplemental review consistent with other areas and the Public Awareness Plan does not require an annual review of the supplemental requirements.**

ONEOK Partners NGP Response:

ONEOK has amended section 11.1 of the Plan to require an annual review of the supplemental review process. The supplemental review team will be the Public Awareness Coordinators and regional management for pipelines in their area. The team will evaluate the region's pipelines considering the risk factors listed in section 11.2. If supplemental enhancements are required, the review team will consider the supplemental communication methods listed in section 11.3.

**ONEOK's procedures are inadequate because its Public Awareness Plan does not include a process which defines and outlines the review to ensure that it includes all information reviewed by both headquarters and field personnel and that ensures the review steps are repeatable.**

ONEOK Partners NGP Response:

ONEOK has amended section 11.2 of the Plan to clarify the supplemental review process. As stated in section 11.2, the Supplemental review team shall determine the public awareness evaluation area for region/area pipelines and evaluate the region's/area's pipelines on a public awareness evaluation area basis by considering each of the factors listed in 11.2.

The evaluation will determine if enhancements are necessary for the evaluation area and consider the communication methods listed in 11.3.

The Public Awareness Coordinator shall be responsible for maintaining the documentation of the Supplemental Review Team's review.

**4. §192.616(d) Public Awareness**

**(d) The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation activities on:**

**(5) Procedures to report such an event.**

**ONEOK's procedures are inadequate because its Affected Public Brochure does not ask the public to report an emergency to the pipeline operator, only to 911, and the information provided in the brochure for emergencies does not match what is actually performed by control center personnel when answering the emergency number.**

ONEOK Partners NGP Response:

The American Petroleum Institute's (API) Recommended Practice (RP) 1162, section 2.3.1 allows reporting to the operator and/or the fire, police, or other appropriate official.

Section 4 of RP 1162, under "Message Content", indicates response should include notifying emergency response personnel and the pipeline operator.

ONEOK Partners has revised the Affected Public Awareness Material, section 5.4.1 of the Plan, to include notifying emergency response personnel and the pipeline operator in the event of a pipeline emergency.

The control center in Tulsa, has revised the telephone answering protocol, to reflect the companies listed in the program.

**5. §192.616(g) Public Awareness**

**(g) The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.**

**ONEOK's procedures are inadequate because its Public Awareness Plan does not delineate a process to determine when an alternative language becomes necessary.**

ONEOK Partners NGP Response:

ONEOK has amended section 4.0 of the Plan to clarify the process to determine when an alternative language is necessary. ONEOK Partners will utilize a professional data resource such as the Modern Language Association database or an equivalent resource as selected by the Tech Team to determine if other languages commonly understood by a significant number and concentration of non-English speaking population are in the pipeline operating regions.

**6. §192.616(i) Public Awareness**

**(i) The operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.**

**ONEOK's procedures are inadequate because its Public Awareness Plan does not include a process for identifying and tracking the necessary changes to the Plan based on findings from the annual implementation review.**

ONEOK Partners NGP Response:

ONEOK has amended section 10.2 of the Plan to clarify that reviews and subsequent revisions shall be documented using the Program Review and Version Log located in Exhibit 4 of Appendix C.

**ONEOK's procedures are inadequate because its Public Awareness Plan does not detail the information being reviewed and analyzed for the effectiveness evaluation and does not include an adequate and repeatable process for measuring program outreach by individual stakeholder audience, measuring percentage of stakeholders reached by individual stakeholder audience, measuring the understandability of message content by individual stakeholder audience, and measuring the desired stakeholder behavior by individual stakeholder audience.**

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CPF 3-2012-1008M

ONEOK Partners NGP Response:

ONEOK has amended various sections in 12.0 Program Evaluation, of the Plan. These changes are intended to clarify the following four measures, which are used to measure the effectiveness of the program:

Measure 1-Outreach, whether the public awareness information reaches the intended stakeholder audiences.

Measure 2-Comprehension, if the recipient audiences understand the message delivered and have the information necessary to respond in alignment with the information provided by ONEOK Partners.

Measure 3-Audience Actions, if the implementation of the public awareness program results in a continually improved understanding of our business and safe pipeline practices and reduces the percentage of non-compliant excavation notifications received by the One-Call Center that resulted from a lack of awareness.

Measure 4-Achieving Bottom Line Results, if the implementation of the public awareness plan has increased damage prevention effectiveness.

***ONEOK's procedures are inadequate because its Public Awareness Plan does not include the process being used by ONEOK for tracking near misses, hits and failures.***

ONEOK Partners NGP Response:

ONEOK has amended section 12.3 of the Plan to include tracking of near misses, hits and failures. ONEOK Partners NGP will utilize an in house program called Safety Health and Vehicle Reporting (SHAVR) system to track near misses, hits and failures.

***ONEOK's procedures are inadequate because its Public Awareness Plan does not include a process for identifying and tracking the necessary changes to the Plan based on the findings from the effectiveness evaluation.***

ONEOK Partners NGP Response:

ONEOK has amended section 12.3 of the Plan to detail the process to be used for tracking the necessary changes to the Plan based on the findings from the effectiveness evaluation. As a result of this annual review, all program revisions shall be documented in the Program Review and Version Log located in Exhibit 4 of Appendix C.

We hope you will find the responses and information provided sufficient to address the Notice of Amendment. If you require any additional information or clarification to any of these responses, please contact Mark Mickelberg, Senior Pipeline Safety Engineer, at 1-651-994-0332, Ext 1225.

Sincerely,



Mr. Wesley Christensen  
Senior Vice President of Operations  
ONEOK Partners

cc: Harold Winnie, PHMSA, Central Region  
Vicky Hale

Attachment: OKSops3.080.415

# Procedure



**Subject:** LIAISON WITH FIRE, POLICE AND OTHER PUBLIC OFFICIALS

**Procedure No.:** OKSops3.080.415 **Date Issued:** 12/31/2009 **Date Revised:** 11/28/2012 Rev16 **OPERATING PROCEDURES**

**Owner:** ONEOK Partners Natural Gas Pipelines

## 1. PURPOSE/EXPECTATION:

This procedure outlines the required communication between the Company and Fire, Police and other Public Officials for the purpose of planning an effective response to a pipeline facility emergency and contributes to compliance with DOT Regulation 49 CFR §192.615(c).

## 2. APPLICABILITY/EXCEPTIONS:

Location Management or Team: Vice President of Natural Gas Pipelines, Pipeline Integrity Management and Gas Control.

This procedure applies to ONEOK Partners pipeline operating companies: Viking Gas Transmission, Guardian Pipeline, Midwestern Gas Transmission, OkTex Pipeline Company, ONEOK WestTex Transmission, ONEOK Texas Gas Storage, ONEOK Gas Transportation, ONEOK Gas Gathering, ONEOK Gas Storage and Potato Hills Gas Gathering System.

The procedure also applies to the transmission pipelines within Mid Continent Market Center operated by ONEOK Field Services. ONEOK Field Services shall follow the Operating Procedures Manual Natural Gas Pipelines and Engineering Standards which are referenced within the ONEOK Pipeline Integrity Management Program. All other pipeline operations within Mid Continent Market Center not related to this procedure will continue to use the ONEOK Partners Operations and Maintenance Manual.

## 3. GUIDELINE OR PROCEDURE:

- 3.1. Each location shall institute a program for establishing and maintaining liaison with fire, police, and other emergency response organizations. This program will include meetings and/or communication with the appropriate organizations at intervals not exceeding 15 months, but at least once each calendar year.
- 3.2. Identify those fire, police and other public agencies or officials who may be the first to respond to a pipeline emergency or may be called by the Company to assist in such an emergency, following the criteria as defined in section 8.1 of the ONEOK Public Awareness Plan.
- 3.3. Include in the communication efforts, the points in Sections 3.3.1. through 3.3.6. If any organization refuses or fails to meet with a Company representative, deliver to that organization appropriate written materials and other information that communicates the expectations in Sections 3.3.1 thru 3.3.6 and identify the name and phone number of a Company Representative the organization should contact to communicate information to the Company about the organization's resources and responsibilities.
  - 3.3.1. Determine the responsibilities of each organization as well as the geographic area for which each has jurisdiction.
  - 3.3.2. Determine the resources each organization has that may assist the Company in an emergency response. Advise each organization of the Company's ability to respond to various types of emergencies and communicate to their organization that they may be called upon to assist for the following types of emergencies:
    - Gas Detected inside or near a building: Emergencies involving gas detected in or near buildings should be prioritized in order to have sufficient personnel for response. For leak classification and action criteria, refer to the site Emergency Response Plan.
    - Fire located near or directly involving a pipeline: Emergencies involving fire located on or near pipeline facilities may require those facilities to be isolated. If a major delivery point is involved, an alternative gas supply may be needed.
    - Explosion occurring near or directly involving a pipeline facility: Emergencies involving an explosion on or near pipeline facilities may result in damage from fire and shock waves.
    - Natural Disaster: Natural disasters, such as earthquakes, floods, hurricanes, tidal waves, or tornadoes, may affect the safe operation of pipeline facilities in many different ways. Operator personnel should be dispatched to affected areas as soon as possible to evaluate the situation and proceed with emergency response, as necessary, to keep or make conditions safe.If hazardous materials are stored at a Location facility, liaison activities must include providing fire and police officials with specific information relative to those materials.
  - 3.3.3. Advise each organization of recommended actions to take if they are the first on the scene of a pipeline facility emergency.

# Procedure



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- 3.3.4. Plan how these organizations will provide mutual assistance to minimize hazards to life and property.
- 3.3.5. Determine circumstances for establishing a field command center and agree upon responsibilities for operation of the center.
- 3.3.6. Advise each organization that they are not allowed to operate any Company facilities such as closing valves.
- 3.4. Incorporate into the Location's Emergency Plan applicable information about each organization, including any unique or specific agreements on emergency response. Reference OKSops3.080.403 Emergency Plans.
- 3.5. Utilize the most effective means to communicate and maintain liaison with these organizations. Such means may include:
  - 3.5.1. Individual face-to-face meetings conducted by the operator with local Emergency Planning committees or organization or its representatives established by state law or local ordinance.
  - 3.5.2. Joint face-to-face meetings with other pipeline companies. If such meetings are coordinated by another pipeline company or a third party, the Company will have an active role in communicating appropriate emergency response information. If invited organizations do not participate, provide the information outlined in Section 3.3. as applicable, through a face-to-face meeting or by certified mail, "Return Receipt Requested".
  - 3.5.3. Participation in regional training or planning meetings of such groups as fire or police, where the opportunity exists to communicate with a large number of the organizations identified in Section 3.3., in a single meeting.
  - 3.5.4. Telephone communication with a responsible person representing an organization with distribution of appropriate written materials and other information that communicates the expectations in Section 3.3.
  - 3.6.5 Mailings containing information and expectations for emergency response.
- 3.6. **Oklahoma**  
Third-party provider, OPAL, conducts face-to-face meetings with emergency response personnel communicating with information found in section 3.3. They also provide documentation of names, titles, and organizations of person(s) who were unwilling or unable to meet, as well as the date(s) and time(s) attempts were made to contact them.
- 3.7. **Texas**
  - 3.10.1 The program should include meetings with the appropriate organizations at intervals not exceeding 15 months, but at least once each calendar year. Mail a written request for an in-person meeting to the emergency official(s) by certified mail, return receipt requested. If no response is received to the mailing, send a request for an in-person meeting by facsimile (fax) to the official(s). If no response is received to the fax transmission, make one or more telephone calls or email message transmissions to the emergency official(s) requesting an in-person meeting. If a meeting does not take place, a company representative shall arrange a telephone conference with the appropriate officials or deliver the community awareness information by certified mail, return receipt requested.
  - 3.10.2 Notify the Texas Railroad Commission by filing with the Commission's Pipeline Safety Division, no later than January 15 of every even numbered year, of any public school or public school recreation area which is located within 1000 feet of a natural gas pipeline. Include the following in the filing:
    - The name of the school;
    - The street address of the school; and
    - The identification (system name) of the pipeline.

## 4. DEFINITIONS:

"Face-to-Face": Personal Contact (Ref: RP1162, First Edition, section 5.2): Personal contact describes face-to-face contacts between the operator and the intended stakeholder audience. Personal contact may be made on an individual basis or in a group setting. Some examples of personal contact communications are;

- Door-to-door contact along the pipeline
- Telephone calls
- Group meetings
- Open Houses
- Community Events
- Charitable contribution presentations by the pipeline company

## 5. REFERENCE OR RELATED POLICIES:

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# Procedure



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Emergency Plans	OKSops3.080.403
ONEOK Partners Public Awareness Plan	OKSops3.080.425

## 6. RECORDKEEPING REQUIREMENTS:

- 6.1. Maintain records of initial contacts made or attempted with emergency response organizations for the life of the pipeline. Maintain lists of emergency response agencies. Ensure lists are created and maintained that identify the agencies that may respond to emergencies at company facilities and include the following information:
  - 6.1.1. Agency title/name and phone number.
  - 6.1.2. Type of agency (i.e., fire, police, medical, etc.).
  - 6.1.3. Geographic area of responsibility.
  - 6.1.4. Availability to assist during a pipeline/facility emergency.
  - 6.1.5. Type of hazardous material training.
- 6.2. Maintain documentation of any agreements or special response arrangements for five (5) years or as long as they are in effect, whichever is longer.
- 6.3. Maintain records of continuing liaison meetings or contacts, including attendance by emergency response officials and acknowledgment of receipt of documents by such officials. Maintain records for five (5) years or of the most recent contact with a response agency, whichever is longer.

## 7. RESPONSIBILITY FOR PROCEDURE:

Address all questions on this procedure to Pipeline Integrity Management.