April 15, 2011

Byron E. Coy, PE
Director, Eastern Region
United States Department of Transportation
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: Notice of Amendment CPF 1-2011-1002M

Dear Mr. Coy:

NiSource Gas Transmission & Storage (NGT&S) respectfully submits this letter in response to the Notice of Amendment (NOA) CPF 1-2011-1002M, which was dated March 22, 2011, and received by NGT&S on March 23, 2011. The NOA was issued as a result of inspections that had occurred in the fall of 2009.

Details for addressing the individual items noted in the NOA are outlined below. The language from the NOA is in bold, followed by a brief description of the action taken by NGT&S to address the respective item.

Item 1: §192.707 Procedural manual for operations, maintenance, and emergencies.
(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
(8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedure when deficiencies are found.

NGT&S Response:
Following the PHMSA inspection in 2009, NGT&S recognized the need to address the periodic review of work done by operator personnel. As a result, NGT&S incorporated language in the O&M Manual (Plan Number 10.01.03) to address plan review. Provided below is an excerpt of the language incorporated:

“Periodically, work done by operations or maintenance personnel will be reviewed to determine the effectiveness and adequacy of the O&M Manual used in normal operations and maintenance. The O&M Manual will be modified to correct any deficiencies found. Operations/Maintenance and technical personnel who are close to the work and who have
knowledge and expertise of the tasks and work performed are randomly selected to review select sections of the O&M Manual for adequacy and effectiveness during the annual O&M Manual review process. Field observations associated with O&M plans can also be documented using the form provided in Exhibit B. This form can be used as part of, or outside of the annual O&M Manual review process. The original form or scan copy should be provided to the Domino.doc administrator. The Domino.doc administrator will provide a copy of the forms to the plan originator so that any plan deficiencies noted can be addressed.”

In addition to the above language, a Field Observation Documentation Form was developed and incorporated into the plan as Exhibit B. These changes were made to the Plan and became effective on June 18, 2010. A copy of the Plan is included as Attachment A.

**Item 2: §192.615 Emergency plans.**

(b) Each Operator shall:

(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

**NGT&S Response:**

NGT&S has updated O&M Plan 100.01.01, Emergency Plan, to include an Annual Emergency Plan Training Review. This review will be used to assess training materials and the effectiveness of the emergency plan training. Documentation of all training and any mock drills will be kept and reviewed during the annual review to verify that training was effective. This review will be used to ensure the training of appropriate personnel was effective and the individuals are knowledgeable of the emergency procedures. Any needed improvements or changes to training identified during the review will be documented and incorporated into the training program. A copy of the updated section along with a copy of the emergency plan training review form is included as Attachment B.

If you have any questions regarding the actions taken to address the items identified in the Notice of Amendment, please feel free to contact me.

Sincerely,

Perry M. Hoffman
Manager – System Integrity
NiSource Gas Transmission & Storage
1700 MacCorkle Avenue SE
Charleston, WV 25314
304-357-2548 ofc
304-357-3804 fax
mikehoffma@nisource.com
Attachment A

NGT&S Plan 10.01.03 O&M Plan Manual Administration
O&M Plan Manual Administration

1 SCOPE
To establish a process to consistently develop, review and maintain a set of written plans for activities including operations and maintenance, emergency response and abnormal operations for jurisdictional facilities. These plans are located in the Operation and Maintenance Procedures Manual (O&M Manual). The review of this plan will also consider the work practices of operating personnel in order to evaluate the continued adequacy and effectiveness of plan documents in the O&M Manual.

2 APPLICABILITY
This plan, as well as all the O&M Manual, is applicable to all NiSource Gas Transmission & Storage (NGT&S) Companies, including Columbia Gas Transmission, Columbia Gulf Transmission, and Crossroads Pipeline, as well as other pipeline facilities operated by NGT&S including Millennium Pipeline Company, LLC, Hardy Storage Company and Central Kentucky Transmission, hereafter called the Company in all these documents. For more information about the NGT&S Companies, go to http://www.NGT&S.com. This plan and the O&M Manual plans are applicable to all employees, contractors, or third party persons who perform operational and maintenance tasks on NGT&S jurisdictional facilities, and the persons who are involved with or responsible for these activities.

2.1 Safety
The Company is committed to the safety of the public and its employees. Employees are to perform their work in the safest manner with the utmost regard for the safety of themselves and the public. All Company safety policies and procedures, as well as the appropriate Job Hazard assessments, should be reviewed as necessary.

2.2 Operator Qualification
All persons performing tasks covered by 49 CFR 192, Subpart N, shall be qualified according to the Company Operator Qualification Plan.

3 PLANS
3.1 General
The individual plans which constitute the Company’s O&M Manual shall be reviewed annually, or as required by regulatory changes, to evaluate the continued effectiveness and adequacy of the plans used in normal and abnormal operations by observation of operator personnel performing work defined in the O&M Manual. The review and approval process is shown in Exhibit A.
The review of activities in the individual plans will be recorded within the document management system (Domino.doc). The “Effective Date” in the footer of each plan document identifies when this review process has been completed.

3.2 **Review Frequency**
The O&M Manual shall be reviewed at least once each calendar year, not to exceed 15 months. A record of an O&M Manual review may be documented in the Company’s work management system. The Company’s document management system also contains records of policy, plan or procedure revisions and approvals.

3.3 **Plan Review**
Periodically, work done by operations or maintenance personnel will be reviewed to determine the effectiveness and adequacy of the O&M Manual used in normal operations and maintenance. The O&M Manual will be modified to correct any deficiencies found. Operations/Maintenance and technical personnel who are close to the work and who have knowledge and expertise of the tasks and work performed are randomly selected to review select sections of the O&M Manual for adequacy and effectiveness during the annual O&M Manual review process. Field observations associated with O&M plans can also be documented using the form provided in Exhibit B. This form can be used as part of, or outside of the annual O&M Manual review process. The original form or scan copy should be provided to the Domino.doc administrator. The Domino.doc administrator will provide a copy of the forms to the plan originator so that any plan deficiencies noted can be addressed.

3.4 **O&M Manual Distribution and Retention**
Documents comprising the O&M Manual are officially maintained in the Company’s document management system, Domino.doc, and are available to all employees in the Company via the NiSource Company intranet site by following the links to Pipeline Policy and Procedures. The O&M Manual, or portions of the manual, may be printed for convenience, mobility and ease of reading the documents. The most current version of the O&M Manual plans, policies and procedures are maintained at this electronic site.

The listing of the plans included in the O&M Manual can be found in Exhibit C.

3.5 **O&M Manual - Document Clarification and Changes**
Questions about the plans within the O&M Manual, and recommendations for changes or corrections of deficiencies to any of these documents, should be addressed to the “Originator” of the document, Engineering Services – Inteity Management, or through the Company’s Continual Improvement web site.

4 **RESPONSIBILITIES**
All employees, contractors, and third party persons involved in operations or maintenance activities must adhere to these plans.

An Engineering Services Manager or their designee must approve in writing any deviation
from these plans.

4.1 **Operations**
Operations personnel who recommend changes or note deficiencies in the O&M Manual, or other Company documents referenced in the manual, should communicate, in writing, recommended changes to the originator of the document, Engineering Services – Integrity Management, or a Domino.doc administrator. Revisions or updates to an O&M Manual plan, procedure, or other Company documents may be communicated to Company employees and contract personnel by the Domino.doc administrator via Company email, the NGT&S Maintenance Home Page, or through the Company’s Pipeline Group Continual Improvement web site located at http://wvapps01.tco.cgs.com/Field/CIHome.nsf/main?OpenPage.

4.2 **Engineering Services**
Employees in Engineering Services who recommend changes or note deficiencies in the O&M Manual, or other Company documents referenced in the manual, should communicate, in writing, recommended changes to the originator of the document, Engineering Services – Integrity Management, or a Domino.doc administrator. Revisions or updates to an O&M Manual plan, procedure, or other Company documents may be communicated to Company employees and contract personnel by the Domino.doc administrator via Company email, the NGT&S Maintenance Home Page, or through the Company’s Pipeline Group Continual Improvement web site located at http://wvapps01.tco.cgs.com/Field/CIHome.nsf/main?OpenPage.

4.3 **Support Staff**
Engineering Services – Integrity Management, in conjunction with the originator or responsible process group of the document, NGT&S Field Services Operation and/or Engineering Services team leader, or designee, will act as a “Review Team” to review and update the plans that are contained in the O&M Manual at the interval described in Section 3.2. Updates as the result of plan review as described in Section 3.3 will also be incorporated, when applicable, during this review process.

5 **RECORDS**

5.1 **Company Forms/Databases**
Databases – Domino. Doc will be used to manage and record this process. The information provided by the “Field Observation Form” shall be maintained for five years, plus the current year.

5.2 **Records Retention**
The Domino.doc Administrative Team will maintain Domino.doc, which retains the records, for a minimum period of five years, plus the current year.
DEFINITIONS

Originator: The originator of a document is an employee who may be contacted to provide additional clarification and/or interpretation of information contained in a document. The originator’s name will be identified in the footer of each document.

REFERENCES

7.1 Related Plan Documents
See Exhibit C

7.2 Related Procedure Documents
Refer to plans shown in Exhibit C or procedures on the PP&P page under NGT&S O&M Manual.

7.3 Operator Qualification Tasks
This list of Operator Qualification tasks indicates the tasks that may be associated with this plan.

<table>
<thead>
<tr>
<th>Task Number</th>
<th>Title</th>
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<tbody>
<tr>
<td></td>
<td>None Associated with this Plan.</td>
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7.4 Other References or Related Specifications
Not Applicable.

REGULATORY CITATIONS AND EXCEPTIONS

8.1 Federal Requirements

<table>
<thead>
<tr>
<th>Citation Number</th>
<th>Title</th>
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<tbody>
<tr>
<td>49 CFR 192.13(c)</td>
<td>General</td>
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<td>49 CFR 192.491</td>
<td>Corrosion Control Records</td>
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<td>49 CFR 192.517</td>
<td>Records</td>
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<tr>
<td>49 CFR 192.603</td>
<td>General Provisions</td>
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<td>49 CFR 192.605</td>
<td>Procedural Manual for Operations, Maintenance and</td>
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<td>Emergencies</td>
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<tr>
<td>49 CFR 192.709</td>
<td>Transmission Lines: Record Keeping</td>
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<tr>
<td>49 CFR 192, Subpart N</td>
<td>Qualification of Pipeline Personnel</td>
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</table>

8.2 State Requirements
Not Applicable.
Exhibit A

PP&P O&M Manual Review Process
NiSouce Gas Transmission and Storage Companies

START

Domino.doc Administrator sends plans to designated persons (Process Owners, Team Leaders, Technical Lead) at random to perform:
- Technical review
- Effectiveness review
- Adequacy review

Communication between the Plan Originator and the Reviewer.

Are there Changes to the Plan?

Yes

Domino.doc Administrator sends plans to Plan Originator (Compliance and Training, Subject Matter Expert, Author) to incorporate comments, resolve any issues with the suggested revision, to make changes that may be required by revisions in the code, and to edit the document.

Legal Review
Comments, revisions, or edits are sent back to the Domino.doc administrator.

Note: Depending on the changes and edits to the plan, a Legal review may not be required.

Domino.doc Administrator

Reviewer sends plans back to the Domino.doc Administrator.

END

Domino.doc Administrator will notify Company Employees on changes to a plan, publish the revised plan in Domino.doc, and posts the updated plan on the Intranet site.

Plans are sent to the appropriate responsible person for approval before they are sent to Field Service Managers for approval.

Manager Approvals
- Pipeline
- Compressor
- M&R
- E&C
- EH&S
- Operations

Domino.doc Administrator

Was the Plan approved?

Yes

No

Domino.doc Administrator

Plan is sent back to the appropriate responsible person

Was the Plan approved?

No

Yes

Domino.doc Administrator

END

PLAN NO: 10.01.03
VERSION NO: 20
EFFECTIVE DATE: 06/18/2010
ORIGINATOR: Engineering Services – Integrity Management
APPROVAL: Mike X Hoffman
Page 5 of 8
Field Observation Documentation Form

Observer(s) Name: ___________________________ Date: ______________

Enter the name of person(s) and their position performing the task(s):
Employee: ___________________ Position: ___________________

_________________________________________________________________

Did the task(s) observed require Operator Qualification under the NGT&S DOT Operator Qualification Plan? Yes ☐ No ☐

If “Yes”, provide the Operator Qualification Task(s) observed.
Task Number: __________ Title: __________________________

_________________________________________________________________

Enter a description of work being performed including location, type of work, adequacy of work, conditions associated with work, etc. __________________________________________________________

_________________________________________________________________

Note: For OQ tasks observed, the observations should include the person’s ability to perform the task adequately as well as their ability to react to abnormal operating conditions. In accordance with Section E of the NGT&S DOT Operator Qualification Program, actions should be taken in the event that circumstances indicate that a qualified individual may no longer be qualified to perform a covered task. This would include notification of the Operator Qualification Team and possible suspension of the individuals OQ task specific qualification(s).

Provide a list of the NGT&S O&M Manual Procedure(s) if any, by the person(s) performing the task(s) during the field observations:
Procedure Number: __________ Title: __________________________

_________________________________________________________________

Were the procedures adequate and effective? Yes ☐ No ☐

If “No”, please describe any ineffectiveness / inadequacies observed. __________________________________________________________

_________________________________________________________________

Note: When inadequacies with a procedure are identified they should be brought to the immediate attention of the NGT&S functional group who has primary responsibility for developing the procedure.

The original form shall be sent to Sherri Edwards, NiSource Gas Transmission & Storage, 7th Floor, 1700 MacCorkle Avenue S.E., Charleston, WV 25314. A scan copy of the original form may also be sent to sedwards@nisource.com. The information provided by this form shall be maintained for 5 years plus the current year.
O&M Manual Plans
NiSouce Gas Transmission and Storage Companies

10.01.03 O&M Plan Manual Administration
40.02.01 Emergency Shutdown System - Testing and Inspection
40.02.04 Gas Detection Systems
40.03.01 Compressor Station Operations and Maintenance Supplement
70.01.01 External Corrosion Control
70.01.02 Internal Corrosion Control
100.01.01 Emergency Plan
110.01.04 Flammable or Combustible Liquids - Handling and Storage
110.01.13 Trenching and Excavation Requirements
110.01.17 Hot Work Permit
170.03.01 Relief Valve, Safety Shutdown Valves, Rupture Disks and Pressure Shutdown Devices - Testing, Inspection, Repair and Capacity Verification
170.03.02 Pressure Regulating and Pressure Limiting Devices - Testing, Inspection and Repair
170.04.01 Piping Test Requirements
200.01.01 Pipeline Facility As-Built Records
210.01.02 Odorization Operations and Maintenance
220.01.01 Pipeline and Pipeline Facility Removal or Abandonment in Place
220.02.01 Pipeline Repair and Realignment
220.02.02 Maximum Allowable Operating Pressure (MAOP)
220.02.03 Population Density, Class Location Determination and Evaluation
220.02.04 Pipeline Markers and Facility Identification
220.02.06 Damage Prevention Program
220.02.07 Pipeline Uprating Requirements
220.03.01 Facility Patrol and Leakage Inspection
220.03.02 Valve Inspection and Operation
220.03.04 Underwater Inspection and Reburial of Pipelines in the Gulf of Mexico and its Inlets
220.03.05 Continuing Surveillance
220.04.02  Isolation, Blow Down and Purging of Gas Handling Facilities and Equipment
220.04.04  Public Awareness Program
220.04.05  Prevention of Accidental Ignition

220.05.01  DOT Incidents – Reporting and Investigating Requirements
220.05.02  Safety Related Conditions – Reporting and Investigating Requirements
220.05.03  Abnormal Operations

290.01.06  In-Service Welding
290.01.07  Tapping Pipelines
Attachment B

NGT&S O&M Plan 100.01.01 Emergency Plan
&
Emergency Plan Training Review Form
Emergency Plan

1 **SCOPE**
This plan provides guidelines for preparing an Emergency Plan Manual, that includes procedures to minimize the hazards resulting from a natural gas pipeline facility (facility) emergency, personnel training requirements and Company liaison responsibilities as required by 49 CFR 192.

2 **APPLICABILITY**
This plan is applicable to all Company personnel who may be involved in an emergency at a Company pipeline facility (see Section 6, Definitions).

2.1 **Safety**
The Company is committed to the safety of the public and its employees. Employees are to perform their work in the safest manner with the utmost regard for the safety of themselves and the public. All Company safety policies and procedures, as well as the appropriate Job Hazard assessments, should be reviewed as necessary.

2.2 **Operator Qualification**
All persons performing tasks covered by 49 CFR 192, Subpart N, shall be qualified according to the Company Operator Qualification Plan.

3 **PLANS**
During an emergency, employees’ actions should be to protect people first, then the environment, and property.

3.1 **Emergency Plan Manual**
A facility specific Emergency Plan Manual (Manual) shall be developed for each Company location. Although each Manual can be customized for specific facilities and equipment at each location, at a minimum, each Manual should include the following information:

A. How to receive, identify, and classify notices of events which require immediate response.

B. An adequate means of establishing and maintaining communication with appropriate fire, police, and other public officials.
C. How to promptly and effectively respond to various emergencies including gas detected inside or near a building, a fire located near or directly involving a natural gas facility, an explosion occurring near or directly involving a natural gas facility, and a natural disaster.

D. The availability of personnel, equipment, tools, and materials that may be needed at the scene of an emergency.

E. Procedures for an emergency shutdown and pressure reduction to any section of the Company’s facility that may be required to minimize hazards to life or property.

F. Information for making the area safe from any actual or potential hazard to life or property.

G. How to notify the appropriate fire, police, and other public officials of a facility emergency.

H. Information for coordinating with the appropriate fire, police, and other public officials both planned responses and actual responses during an emergency.

I. How to safely restore any service outage.

J. How to begin action to investigate and determine the cause of the emergency, if applicable, and as soon as possible after the emergency.

A template is available to team leaders to use in developing a Manual for their facility.

3.2 Reviews and Updates
This plan and each Manual that is maintained shall be reviewed and updated to assure appropriateness and completeness once a calendar year, at intervals not to exceed 15 months. Each Manual should also be updated when critical information (see Section 6, Definitions) in the plan is changed. When a manual is reviewed or updated it should be documented in the Company’s work management system using Procedure 100.001.001, Review and Update Emergency Plan.

3.3 Personnel Training
The Company is required to train all appropriate operating personnel to assure that they are knowledgeable of the emergency procedures in the Emergency Plan Manual once a calendar year. Training should also include a review of:

- Employee activities (i.e. during an emergency exercise or actual emergency) to verify that the training being provided is effective, and that the procedures in the
Manual were effectively followed during an emergency exercise or actual emergency.
- The Incident Management Plan.
- Updates to the NiSource Anti Drug Plan and Alcohol Misuse Prevention Program.

Emergency and Incident Management Plan training should be conducted once each calendar year as reference in Section 8.0 for each Facility Specific Emergency Plan. Training should include the knowledge and use of both the site specific Emergency Plan and Incident Management Plan. Additional training requirements are in Plan 220.04.04 Public Awareness Program.

If an employee is absent during the annual training, a follow-up training session should be scheduled to assure everyone has been trained. Training should be conducted at least once per calendar year.

To ensure that the appropriate personnel are knowledgeable of emergency procedures and to determine the effectiveness of the training, an oral or written test (refer to Sample Questions in Appendix C, site specific Emergency Plan) should be given, or an evaluation of the employees’ performance during a simulated exercise or actual emergency response should be conducted. Feedback from employees’ should also be considered. Verification of the effectiveness of the training and any Lessons Learned from the simulated exercise should be documented using Exhibit A - Emergency Plan Training Review found in Appendix C, site specific Emergency Plan. Any improvements identified as a result of this review should be documented and kept as part of these records and any needed improvements or changes to the training identified during the review should be incorporated into the training program.

3.4 Liaison with Public Officials and Emergency Response Agencies
Operating personnel shall establish and maintain a liaison with appropriate fire, police and other public officials in order to:

- Learn the responsibility and resources of each government organization that may respond to a facility emergency.
- Acquaint officials with the Company’s ability to respond to a facility emergency.
- Identify the types of facility emergencies in which they may be notified.
- Plan how the Company and emergency officials can engage in a mutual assistance that will minimize hazards to life and/or property.

This contact is established through the public awareness meetings scheduled under the NiSource Gas Transmission & Storage Public Awareness Program, and these records shall be documented in the Company’s work management system using Procedure 220.004.004, Public Awareness Activities or electronically using PDQweb. PDQweb is a web based database system managed by Paradigm which houses the NGT&S Public Awareness Program Records, including documentation requirements provided by this
plan.

3.5 **Storage Well Emergency**
The Company operates 37 storage fields in the States of OH, NY, PA and WV. At locations where storage facilities are operated, storage well emergency response procedures are available (refer to Procedure 250.001.001, Storage Well Emergency Plan or facility-specific Manual). In the event of a catastrophic failure, coordination and preparations for a storage well emergency will be managed by Storage.

**RESPONSIBILITIES**

4.1 **Operations**

4.1.1 **Team Member**
Operating personnel are responsible for having a working knowledge of the information and emergency procedures within the Manual, and their roles and responsibilities in an emergency situation that could occur at their location.

Operations is responsible for establishing and maintaining a liaison with the appropriate fire, police and other public officials.

Operating personnel are responsible for completing the required information in the work management system.

4.1.2 **Team Leader**
Team leaders are responsible for assuring that each facility-specific Manual developed specifically for their facilities is reviewed and updated.

Team leaders are responsible to ensure that training is provided to all appropriate operating personnel on the emergency procedures, and that the training is effective.

4.2 **Support Staff**
Engineering Services, System Integrity is responsible for reviewing and updating the template used to develop a Manual.

5 **RECORDS**

5.1 **Company Forms/Database**
Manuals shall be maintained as a hard copy at each normally occupied facility that is involved in the transportation of natural gas. This document must be available to all operating personnel.

Only the current and updated facility-specific version of a Manual shall be maintained at the locations noted above. The Company’s work management system should be used to document annual reviews for each Manual.
Review and updates to the facility-specific version of the Manual should be documented in Procedure 100.001.001, Review and Update Emergency Plan. Additionally, a revision record in the front of the Manual should be used to reflect past revisions.

A record of the employee training must be maintained. LMS shall be used to document individual employee training records. Records created prior to LMS should be on file at the Company location. Electronic format of these records is permissible. The Company’s work management system may be used to schedule training. LMS is the official Company database for employee training records.

Exhibit A - Emergency Plan Training Review found in Appendix C, site specific Emergency Plan should be used to verify the effectiveness of the employee training and document Lessons Learned during a simulated exercise.

Any record of meetings or presentations with any of the appropriate fire, police and/or other public officials should be documented in accordance with Procedure 220.004.004, Public Awareness Activities. For additional information, refer to Section 3.4. Records for meetings conducted under the NGT&S Public Awareness Program are maintained at each Company location. Records may also be requested by contacting the NTG&S Public Awareness Program administrator, or from the NGT&S Public Awareness Team.

Any previous documentation prior to using procedures 100.001.001 and 220.004.004 shall also be maintained.

5.2 Record Retention
With exception to the current and updated Manual, the records identified in Section 5.1 above shall be retained for a minimum period of five years, including the current year. Only the most current and updated Manual should be retained.

6 DEFINITIONS
Critical Information: Information that is essential in assuring a prompt and effective response to any emergency situation.

Pipeline Facility:
1. The physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenances attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders and fabricated assemblies.
2. New and existing pipelines, rights-of-way and any equipment, facility or building used in the transportation of gas, or in the treatment of gas, during the course of transportation.

Transportation of Gas: The gathering, transmission, or distribution of gas by pipeline or the storage of gas, in or affecting interstate and foreign commerce.
7 REFERENCES

7.1 Related Plan Documents

<table>
<thead>
<tr>
<th>Plan Number</th>
<th>Title</th>
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<tbody>
<tr>
<td>220.02.06</td>
<td>Damage Prevention Plan</td>
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<tr>
<td>220.04.04</td>
<td>Public Awareness Program</td>
</tr>
<tr>
<td>220.05.01</td>
<td>DOT Incidents – Reporting and Investigating Requirements</td>
</tr>
<tr>
<td>220.05.02</td>
<td>Safety Related Conditions – Reporting and Investigating Requirements</td>
</tr>
<tr>
<td>220.05.03</td>
<td>Abnormal Operations</td>
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<td></td>
<td>Emergency Plan Manual</td>
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<td>Incident Management Plan</td>
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7.2 Related Procedure Documents

<table>
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<th>Procedure Number</th>
<th>Title</th>
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<tr>
<td>100.001.001</td>
<td>Review and Update Emergency Plan</td>
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<td>100.001.002</td>
<td>Emergency Plan Training</td>
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<td>100.002.001</td>
<td>Emergency Response Plan Template</td>
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<td>220.004.004</td>
<td>Public Awareness Activities</td>
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7.3 Operator Qualification Tasks
This list of Operator Qualification tasks indicates the tasks that may be associated with this plan.

<table>
<thead>
<tr>
<th>Task Number</th>
<th>Title</th>
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<tbody>
<tr>
<td></td>
<td>None Associated with this Plan.</td>
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7.4 Other References or Related Specifications

- Pipeline Group Security Guidelines
- Emergency Plan and Incident Management Plan Training Guidelines

8 REGULATORY CITATIONS AND EXCEPTIONS

8.1 Federal Requirements

<table>
<thead>
<tr>
<th>Citation Number</th>
<th>Title</th>
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<tbody>
<tr>
<td>49 CFR 192.615</td>
<td>Emergency Plans</td>
</tr>
<tr>
<td>49 CFR 192, Subpart N</td>
<td>Qualification of Pipeline Personnel</td>
</tr>
</tbody>
</table>
8.2 State Requirements
Not Applicable.
Exhibit A - Emergency Plan Training Review

Date of Review: ________________________

☐ Emergency Plan Training ☐ Emergency Response Review ☐ Other ________________________

Person(s) Conducting Review (Position):

______________________________________________________________________________
______________________________________________________________________________

Based upon review of the test results, feedback from employees and/or employees' performance during a simulated exercise or actual emergency or other relevant information, are all applicable employees knowledgeable of the emergency procedures?  ☐ Yes      ☐ No

If No, What corrective measures were taken? __________________________________________
______________________________________________________________________________
______________________________________________________________________________

Review the content and test results of the Emergency Plan training and if applicable, any lessons learned from operating experience, incident review, root cause analysis, feedback from employees, as well as any other relevant factors or information to determine if improvements should be made to the Company’s Emergency Response training program or field simulated emergency exercise to improve their effectiveness.

Were they any issues or recommendations for improvement identified as the result of the review?      ☐ Yes      ☐ No

If so, list issues and follow up actions in the table below.

<table>
<thead>
<tr>
<th>Training Type and recommendations for improvement identified as the result of the review:</th>
<th>Follow-up action to carry out recommendations noted.</th>
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