

08-01-11P04:15 RCVD



Robert Checketts
Vice President
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2755 East Cottonwood Parkway
Salt Lake City, Utah 84121
P.O. Box 71400
Salt Lake City, UT 84171-0400

July 29, 2011

Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, Colorado 80228

Re: CPF 5-2011-1002M

Dear Mr. Hoidal:

Kern River Gas Transmission Company (KRGT) is submitting its procedures which have been modified to address the concerns of the Pipeline and Hazardous Materials Safety Administration (PHMSA) as expressed in the referenced Notice of Amendment. The changes made are summarized for each of the items as follows:

1. **§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.**

Section 4.0 of Procedure 10.21.01 (DOT Emergency Response Procedure) has been modified to elaborate on and clearly state the purpose of the evaluations of emergency drills which were required by the previous procedure.

2. **§192.615 Emergency plans. (b) Each operator shall: (3) Review employee activities to determine whether procedures were effectively followed in each emergency.**

Section 12.1.1.2 of Procedure 10.21.01 (DOT Emergency Response Procedure) has been added to better define and clearly state the purpose of the evaluations of emergency response actions which were required by the previous procedure.

Kern River is strongly committed to maintaining and following an effective procedure manual to ensure a safe operation. We are confident that the corrections made to the enclosed Kern River procedures will be to PHMSA's satisfaction. Please contact Von McAllister at 801-937-6333 if you would like to discuss or if you need any additional information. Thank you for your consideration regarding these matters.

Sincerely,



Robert Checketts

cc: Jeff Stahoviak, PHMSA
Von McAllister, Kern River Gas Transmission

Enclosure: Procedure 10.21.01 (DOT Emergency Response Procedure)



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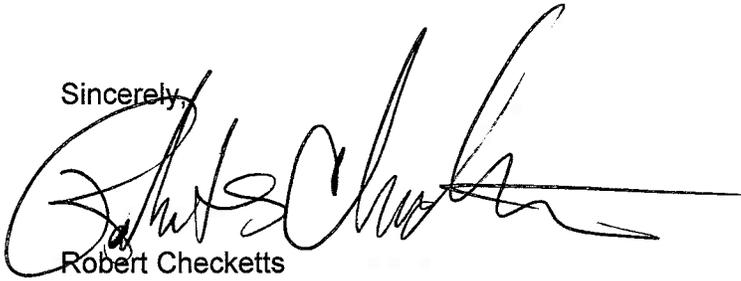
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Enclosure: Procedure 10.21.01 (DOT Emergency Response Procedure)

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POLICY

It is the policy of KRGT to establish an Emergency Plan and Preparedness Manual (EPPM) that will be used at all locations, to address and minimize hazards resulting from a gas pipeline emergency by making safe any actual or potential hazard to life or property.

PURPOSE

The purpose of this procedure is to ensure all affected employees have the knowledge, tools and equipment to respond to pipeline emergencies by taking actions to protect employees, the public and then property. This procedure contributes to compliance with DOT 49 CFR §§.605, .615, .617 and .631.

1.0 RELATED PROCEDURES

[10.08.01, Regulatory Reporting Requirements](#)

[10.16.01, Maintaining Inventories of Emergency Pipe](#)

[10.17.01, Conducting Public Education Liaison Activities](#)

[10.18.01, Investigation of the Root Cause of Accidents and Failure](#)

[70.09.01, Commissioning, Removing and Returning Pipeline and/or Facilities to Service](#)

[80.25.01, Isolating Pipeline Segments from Gas Control](#)

2.0 APPLICABLE REGULATIONS AND STANDARDS

DOT - 49 CFR§192.605

DOT - 49 CFR§192.615

DOT - 49 CFR§192.617

DOT - 49 CFR§192.631

3.0 APPLICABLE OPERATOR QUALIFICATIONS

N/A

4.0 TRAINING

4.1 Responsibility: District managers and Manager of Operations Control and Analysis

4.1.1 Ensure that all affected employees who may be involved in an emergency are prepared to respond in an expeditious and safe manner to; first protect life and then protect property and the environment, taking all necessary precautions.

4.1.2 Annually, conduct training that includes the elements of this procedure. the EPPM and the On-Scene Coordinator Plan. Effectiveness of the training must be evaluated by:

4.1.3 A written test and/or,

4.1.4 Table top scenarios, and/or

4.1.5 Mock emergency drills.

4.1.6 Upon completion of the evaluation, a lessons learned review must be completed. Any deficiencies discovered during the tailgate exercise and/or

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discussed during the lessons learned review must be acted upon and resolved to ensure all affected employees respond to emergencies as required.

4.1.6.1 Utilize KRGT 0156 Emergency Response Training Record Mock Emergency to facilitate and record the review.

4.1.7 Training in emergency response and actions to be taken should include the contents of this procedure including but not limited to;

4.1.7.1 The EPPM

4.1.7.2 Utilization and understanding of the Emergency Call Tree,

4.1.7.3 The role of the On-Scene Coordinator and functions of the Incident Command System,

4.1.7.4 Forms that may be required to be completed during and immediately after an emergency,

4.1.7.5 Interacting with the media

4.1.7.6 The preservation of evidence,

4.1.7.7 Other elements relevant to the location and its employees.

4.2 Actual emergencies in which the EPPM and this procedure have been utilized and documented may satisfy the annual training requirement.

4.2.1 A review of employee activities will be conducted to determine whether the elements of the EPPM and this procedure were effective during each emergency. Refer to section 12.0 of this procedure for elements required to ensure all affected employees are aware and knowledgeable of their emergency response duties.

5.0 RECORD KEEPING

5.1 Record all training sessions utilizing KRGT 0074, Safety Meeting Record.

5.2 The district is to permanently retain KRGT 0158, Emergency Response Evaluation Record.

6.0 DEFINITIONS

Emergency - for the purposes of this procedure an emergency is defined as any situation demanding immediate action which involves KRGT facilities or its operations, which may endanger life, affect property, affect the environment or adversely affect the normal service provided to KRGT customers.

EPPM – an acronym for KRGT’s Emergency Plan and Preparedness Manual.

Facility – for the purposes of this procedure a facility is defined as any building, structure, yard, station, valve setting or piping or other equipment that is instrumental to the transportation, compression, delivery or receipt of natural gas.

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Initial Responder - the first KRGT employee to arrive at the facility or to be first aware at the facility or the KRGT gas controller to recognize and react to the SCADA notification.

PROCEDURES

7.0 ELEMENTS OF THE EMERGENCY PLAN & PREPAREDNESS MANUAL (EPPM)

- 7.1 The following elements comprise the EPPM
 - 7.1.1 Policy, Purpose and Definitions
 - 7.1.2 Emergency Notification (Emergency Call Tree),
 - 7.1.3 Receiving, Identifying and Classifying Emergencies,
 - 7.1.4 Establishing and Maintaining Communications with Emergency Responders,
 - 7.1.5 Responding to the Different Types of Emergencies,
 - 7.1.6 Restoration of Service,
 - 7.1.7 Incident Investigation and Root Cause Analysis,
 - 7.1.8 Training
 - 7.1.9 Media Communications
 - 7.1.10 Forms,
 - 7.1.11 Driving Instructions,
 - 7.1.12 Route Maps (PEOP),
 - 7.1.13 Notification Lists,
 - 7.1.14 Emergency Valve Lists,
 - 7.1.15 Company Equipment on-hand Lists.
 - 7.1.16 Emergency contractors

8.0 DISTRIBUTION OF THE EPPM

- 8.1 The EPPM and associated materials will be made available to all KRGT employees that have access to the on-line version of the O&M manual.
- 8.2 Employees are instructed to always utilize the on-line version the EPPM for the latest version.
- 8.3 **Responsibility:** District managers
 - 8.3.1 Ensure that at least one up-to-date hard copy of the EPPM and all documents and forms supporting the EPPM are in place at the district office and all compressor stations.
 - 8.3.2 The district manager shall determine if the EPPM is needed at other locations such as employee vehicles.
- 8.4 **Responsibility:** Manager, Operations Control and Analysis

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8.4.1 Ensure that at least one up-to-date hard copy of the EPPM and all documents and forms supporting the EPPM are in place in Gas Control, the office of the Manager of Operations Control and Analysis and the primary off-site gas control location.

8.5 Responsibility: Manager, Pipeline Safety

8.5.1 Ensure that at least one up-to-date hard copy of the EPPM and all documents and forms supporting the EPPM are in place in Pipeline Safety and the office of the Vice-President of Operations, IT and Engineering.

9.0 EMERGENCY RESPONSE PRIORITIES

9.1 Once an emergency event has been identified, certain activities take priority over others. Action taken to safeguard people will take precedent over all other activities. The following list is a guideline to the chronology of events that should be initiated in response to an emergency.

9.1.1 Do not take actions that endanger people or escalate the incident.

9.1.2 Make notifications utilizing the Emergency Call Tree as outlined in the EPPM.

9.1.3 Respond to the different types of emergencies as outlined in the EPPM.

9.1.4 Implement the elements found in the On-Scene Coordinator Plan.

9.1.5 Complete form KRGT 0153, Notification and Event Classification Record.

9.2 Gas control operators are expected to take immediate action when confronted with emergency situations outlined in the EPPM and other situations in which immediate action is required.

10.0 KRGT EMERGENCY RESPONDERS

10.1 All employees expected to respond to an emergency shall have completed emergency response training (refer to Section 4.0) and have all necessary Operator Qualifications in place.

10.2 Responsibility: Initial Responder

10.2.1 The initial responder is responsible for completing the following:

10.2.1.1 Determining the type of emergency.

10.2.1.2 Protect themselves and others including the public

10.2.1.3 Secure KRGT facilities without escalating the event or endangering life.

10.2.1.4 Liaison with emergency responders.

10.2.1.5 Make notifications as indicated on the Emergency Call Tree.

10.2.1.6 Gathering information needed for KRGT 0153 Initial Notification and Event Classification Form and complete form KRGT 0154 First Aware/First Responder Checklist and Action

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Documentation as a means of determining the significance of the event.

10.2.2 Refer all media inquiries and requests to the KRGT primary spokesperson or KRGT media relations representative. Refer to the Media Response Plan for further guidance.

10.3 Responsibility: On-Scene Coordinator

10.3.1 The Initial Responder will fill the role as the On-Scene Coordinator until relieved by the district manager or his appointee.

10.3.2 Bring the emergency situation under control by coordinating emergency response actions with the Incident Commander. Refer to the On-Scene Coordinator Plan for further guidance.

10.3.3 Work with emergency responders,

10.3.4 Keep affected KRGT personnel apprised of the emergency,

10.3.5 Ensure the safety of people,

10.3.6 Document actions taken.

10.3.7 Establish an Incident Command Post in the event that authorities having jurisdiction have not already done so. If the authority having jurisdiction has established an Incident Command Post the On-Scene Coordinator will work with the Incident Commander.

10.4 Responsibility: District manager

10.4.1 Ensure form KRGT 0155, Emergency Response Training Desk Top Scenario, or form KRGT 0156, Emergency Response Training Mock Emergency, are completed.

10.4.2 Act as primary on-site spokesperson to the public and media or delegate the responsibility to a qualified onsite KRGT employee. Refer to the Media Response Plan for a detailed listing for the primary spokesperson's responsibilities.

10.5 Responsibility: Gas Control

10.5.1 Gather as much information as possible, terminating any operations in the area which could be adversely affect or add to the problem and advise on-call operations personnel about the emergency.

10.5.1.1 Refer to procedure 80.25.01 Isolating Pipeline Segments from Gas Control when isolating any pipeline segments.

10.5.2 Make the initial internal notifications regarding the emergency according to the Emergency Call Tree.

10.5.3 Furnish assistance to district operations personnel during an emergency. If the district operations person on-call cannot be reached, contact any other KRGT employee who could be of assistance.

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- 10.5.4 Act as the communications center for the emergency response until an Incident Command Post with communications is established at the incident site.
- 10.5.5 Notify any affected customers or producers of the emergency.
- 10.5.6 Complete the [Initial Notification and Event Classification including form KRGT 0153](#).
- 10.5.7 Notify National Emergency Response Center, when appropriate. Refer to procedure [10.08.01, Regulatory Reporting Requirements](#).
- 10.6 Responsibility: Manager, Pipeline Safety or designee
 - 10.6.1 Ascertain from Gas Control the location and nature of the emergency.
 - 10.6.2 Serve as primary liaison between the emergency site and federal, state and/or local pipeline safety agencies.
 - 10.6.3 Advise site management and KRGT executives of government agency interest in the emergency.
 - 10.6.4 Perform initial notifications to federal, state and/or local agencies (not the National Response Center call, see Gas Control responsibilities).
 - 10.6.5 Coordinate with the KRGT Legal Department regarding the release of information and documents to government agencies.
 - 10.6.6 Submit necessary, follow-up written reports to federal, state and/or local pipeline safety agencies. Refer to procedure [10.08.01, Regulatory Reporting Requirements](#).
- 10.7 Responsibility: Communications
 - 10.7.1 Train all affected employees on the elements of the Media Response Plan as requested by management.
 - 10.7.2 Assume the role of primary spokesperson or KRGT media relations representative.
- 10.8 Responsibility: Manager, Land/Environment
 - 10.8.1 Ascertain from Gas Control the location and nature of the emergency.
 - 10.8.2 Serve as primary liaison between KRGT and landowners affected by the incident.
 - 10.8.2.1 Affected landowners may include landowners not directly on the right-of-way.
 - 10.8.3 Advise site management and KRGT executives of landowner concerns and special needs e.g., hotel accommodations, medical, etc
 - 10.8.4 Maintain detailed log of contacts with landowners and coordinate all claims investigations.
 - 10.8.5 Maintain dialogue with landowners during the incident to keep them informed of progress and follow up to ensure commitments were met.

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10.9 Responsibility: General Counsel

10.9.1 Provide legal counsel as applicable to minimize exposure to KRGT.

11.0 EMERGENCY RESPONSE TEAM

11.1 The Emergency Response Team is a pre-selected group that will respond to emergencies as directed by the Vice President of Operations, IT & Engineering. The team consists of all or part of the following positions/departments, depending on the specific circumstances of the emergency.

11.1.1 Vice President, Operations, IT and Engineering.

11.1.1.1 The Vice President of Operations, IT & Engineering will select additional personnel as necessary to appropriately respond to the emergency.

11.1.2 General Counsel

11.1.3 Director, Operations

11.1.4 Director, IT, and Operations Control & Analysis

11.1.5 Director, Engineering

11.1.6 Manager, Pipeline Safety

11.1.7 Manager, Operations Control and Analysis

11.1.8 Manager, Land & Environment

11.1.9 Safety Specialist

12.0 POST EMERGENCY EVALUATION

12.1 Responsibility: District manager

12.1.1 After the completion of the emergency response repairs, return the facility to normal service and debrief all parties involved in responding to the emergency, complete the following:

12.1.1.1 Evaluation of emergency response procedures and recommend any changes to make the EPPM, KRGT's O & M manual and the Operator Qualification Plan more effective.

12.1.1.2 Utilize KRGT 0158 Emergency Response Evaluation Record to capture the following:

12.1.1.2.1 Clearly describe the incident,

12.1.1.2.2 Identify the persons and all departments involved

12.1.1.2.3 List all emergency response agencies and/or public officials (if involved)

12.1.1.2.4 Evaluate the response

12.1.1.2.4.1 Review the O & M procedures used; determine if they were effective.

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12.1.1.2.4.2 Review employee actions to determine whether employees reacted as necessary and the procedures were effectively followed.

12.1.1.3 Suggest additional training for affected employees to address mistakes or weak response activities if observed during the emergency response.

13.0 ROOT CAUSE ANALYSIS

13.1 **Responsibility:** Vice-President of Operations, IT & Engineering

13.1.1 Taking into account the nature and significance of the event; determine the make-up of the root cause analysis team.

13.1.2 The root cause analysis must adhere to procedure 10.18.01, Investigation of the Root Cause of Accidents and Failures and Collection and Preservation of Specimens, Samples and Data.

FORMS

[KRGT 0153, Initial Notification and Event Classification Record](#)

[KRGT 0154, First Aware/First Responder Checklist and Action Documentation](#)

[KRGT 0155, Emergency Response Training Record: Desk Top Scenario](#)

[KRGT 0156, Emergency Response Training Record: Mock Emergency](#)

[KRGT 0158, Emergency Response Evaluation Record](#)

REVISION HISTORY

Rev #	Rev Date	Comment
Rev 01	03/03	
Rev 02	01/04	Revised phone numbers and minor update.
Rev 03	05/04	Change titles and phone numbers
Rev 04	02/05	Minor wording changes and clarifications
Rev 05	07/05	Contact changes; and various corrections throughout
Rev 06	04/06	Updated section 2.8, the Media Contact Sheet, and the Emergency Response Team. Minor revisions throughout
Rev 07	03/07	Clarified text for better understanding; updated resource contacts
Rev 08	07/08	Revisions to text; added new Appendix A to EPPM; and revised Significant Event Notification Plan.
Rev 09	04/09	Reformatted; combined policy with procedure. Revision history references to sections are now incorrect. Created a table for the "do's and do not's" found in section 8.14.4. Removed names and inserted titles throughout the document. Created a table in section 9.1 for emergency equipment. Added definition for local emergency team.
Rev 10	11/10	Complete re-write of this procedure to align with the changes made to the EPPM.

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Rev 11	07/11	Added 192.631 reference; defined recordkeeping needs in section 5.0.; section 8.0 defined where EPPM's are required; added section 9.2 regarding gas controllers; 10.9.2 was removed; added language to section 12.0 better defining what must be covered in the post emergency evaluation.
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