Seminole
Energy Services

Seminole Gas Company
1323 E. 71st Street, Suite 300
Tulsa, Oklahoma 74136

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

October 28, 2013

Mr. Wayne T. Lemoi
Director, Office of Pipeline Safety
PHMSA Southern Region
233 Peachtree Street Ste. 600
Atlanta, GA 30303

Re: CPF 2-2013-6007M
Submittal of Amended Plans and Procedures

Dear Mr. Lemoi:

Please accept this written correspondence, and all attachments, as Seminole Gas Company's ("Seminole") submittal to the above referenced Notice of Amendment. This submittal of amended plans and procedures to our Company's HLOMEM and OQP will be implemented as soon as Seminole receives approval from your organization. Thank you in advance for your time and consideration on this matter.

Sincerely,

Jason Few
Chief Executive Officer

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PROPOSED WORDING
PHMSA NOTICE OF AMENDMENT
SEMINOLE - TENNESSEE LIQUID PIPELINE
CPF 2-2013-6007M
SEPTEMBER 9, 2013

ITEM 1:

The last paragraph in Section VII. J shall be revised as follows…

Emergency preparedness can be defined as ***preimpact activities (ie: annual liaison with fire, police and other public officials) that establish a state of readiness to respond to Pipeline events that could affect the community.*** It establishes organizational readiness to minimize the adverse impact of these events by means of active responses to protect the health and safety of individuals, the environment and the integrity/functioning of the Pipeline. Emergency preparedness is achieved by planning, training, equipping, and exercising the emergency response organization. Emergency planning is most likely to be successful when it is viewed, either explicitly or implicitly, from a systems perspective. This entails an understanding of the potential hazards, goals of the emergency response, the resources of the Company and community as a system, and the functional interactions of the different units within the system.

The ***primary goal*** of emergency response is to protect the health and safety of the public and emergency responders. In addition, the emergency response effort should protect public and private property and the environment, as well as minimize the disruption of community activities. One important part of the annual meeting (liaison) with fire, police and other public officials is to identify and discuss the ***resources*** of the Company and community; which include trained personnel, equipment, and materials. The often expressed opinion "every emergency is unique" is true but the usual conclusion "we can improvise during an emergency rather than plan beforehand" does not follow. It is true that emergency responders must always improvise to meet the demands of a specific situation, but it is important to understand that there are different types of improvisation. It is important to recognize that improvising and implementing response actions takes more time than implementing preplanned actions—and time is usually very limited in an emergency. Moreover, improvisations can impede or even duplicate the response actions of the agencies involved in the emergency response. Consequently, annual liaison meetings are designed to develop community emergency preparedness so they can minimize the amount of *unnecessary* improvisations.

Annual liaison meetings will also identify the functions that must be performed to respond to these demands and the resources, including ***communication systems***, required to accomplish the response functions. The resources required for emergency response can then be compared with those maintained within the Company and community. Annual liaison meetings are not the only programs the Company uses to inform the community of potential emergency situations. The Company also uses the Tennessee One-Call (Partners in Protecting Everyone) to meet with public officials as well as their Public Awareness Program to inform "stakeholders" of how to identify a potential hazard and what to do. An example of the Company's continuing education program notice in local newspapers is provided in Section X, Tab G.

ITEM 2:

Section VII. D shall be revised as follows…

2. Periodic Reviews.

    a. The Facility Supervisor shall periodically review the work performed by Company and contractor personnel to:

1) determine the effectiveness of those procedures being used during maintenance/operations activities and

2) take corrective action when deficiencies are found/identified.

b. The review shall be accomplished/documented by the Facility Supervisor by:

1) obtaining a copy of the written maintenance/operating procedure;

2) confirming the employee/contractor followed the proper steps/tasks; and

3) when necessary, noting when deficiencies are found/identified and taking appropriate corrective action (ie: employee/contractor discipline, retaining or revising the procedure).

c. As a basic rule of thumb, periodic reviews are "recommended" to be performed at least once every 3 months.

3. Additional Training Guidelines are located in our Operations Procedures Manual and Operator Qualification Plan.

ITEM 3:

Section VIII. E shall be revised as follows:

3. Pipeline Excavation Safety.

a. Whenever it is necessary for company/contractor personnel to enter a pipeline excavation **for any reason**, the excavation shall first be tested for unsafe accumulations of vapor/gas.

b. The pipeline excavation shall be tested with a CGI/LEL meter by someone who is OQ qualified (documentation on file) to use the meter.

c. The test shall be documented on the Company Excavation/Trenching Report.

d. In addition, rescue equipment (ie: safety harness/rope; stretcher, etc.) shall be readily available and in good condition ready to be used.

e. All requirements of the Company Excavation/Trenching Procedure shall be followed (See Company Safety Manual).

ITEM 4:

Section VII, M shall be revised as follows:

1. Sudden Increase in Pipeline Pressure

a. Shutdown the Pipeline.

b. Notify the Pipeline Supervisor, or their designate, regarding the problem and actions being taken.

c. Continue to monitor and keep the Pipeline Supervisor, or their designate, informed of the situation.

d. Take notes, such as pressure, time, persons contacted, observations, etc.

e. Conduct investigation to determine the cause of the abnormal operating condition.

2. Sudden Decreases in Pipeline Pressure

a. Shutdown the Pipeline.

b. Notify the Pipeline Supervisor, or their designate, regarding the problem and actions being taken.

c. Attempt to locate the problem.

d. Continue to monitor and keep the Pipeline Supervisor, or their designate, informed of the situation.

e. If a break has occurred, try and locate the section of the pipe.

f. Take notes, such as pressure, time, persons contacted, observations, etc.

g. Conduct investigation to determine the cause of the abnormal operating condition.

3. Floods, Tornados and Hurricanes

a. Shutdown the Pipeline.

b. Notify the Pipeline Supervisor, or their designate, regarding the problem and actions being taken.

c. If Pipeline damage occurs, conduct investigation to determine the cause of the abnormal operating condition.

4. Natural Disasters

a. Shutdown the Pipeline.

b. Notify the Pipeline Supervisor, or their designate, regarding the problem and actions being taken.

c. If Pipeline damage occurs, conduct investigation to determine the cause of the abnormal operating condition.

5. Civil Disturbances

a. If necessary, shutdown the Pipeline.

b. Notify the Pipeline Supervisor, or their designate, regarding the problem and actions being taken.

c. If Pipeline damage occurs, conduct investigation to determine the cause of the abnormal operating condition.

6. Bomb Threats

a. If necessary, shutdown the Pipeline.

b. ALL BOMB THREATS SHALL BE TAKEN SERIOUSLY.

c. Try and stay calm; do not panic.

d. If possible, signal another employee to contact the Pipeline Supervisor, or their designate, and inform them of the call.

e. Attempt to keep the caller talking and obtain the following information:

1) Location of the bomb.

2) Time of detonation.

3) Appearance, size and kind of bomb.

4) Purpose.

5) Make notes about the caller's voice.

6) Notify the Police/Fire Department.

7) Evacuate the area.

f. If Pipeline damage occurs, conduct investigation to determine the cause of the abnormal operating condition.

7. Communications Failure

"NO CHANGES"

ITEM 5:

Section V shall be revised as follows:

A. General

1. An emergency will be considered to have occurred in the event of:

a. any significant Pipeline leak;

b. Pipeline failure;

c. accident resulting from a failure of the Pipeline;

d. fire/explosion near the Pipeline/facility;

e. accidental release of liquid (HVL) from the Pipeline; or

f. any natural disasters affecting the Pipeline.

2. **All Pipeline Operators are OQ qualified/authorized to respond to Pipeline emergencies**. The first Pipeline Operator to become aware of the emergency shall:

a. shutdown the Pipeline;

b. notify the Pipeline Supervisor, or their designate, regarding the problem and actions being taken;

c. take action to protect human life first (ie: evacuation/CGI/LEL), the environment second (ie: prevent contamination of waters) and equipment last (ie: shutdown);

d. continue to monitor the situation (ie: CGI/LEL) and keep the Pipeline Supervisor, or their designate, informed of the actions being taken.

B. Initial Action

1. When a Pipeline Operator...

2. After the information about the emergency has been obtained, the Pipeline Operator...

C. Corrective Action

1. The first Pipeline Operator...

d. The Pipeline Operator...

6. The Pipeline Supervisor, or their designate, is responsible for conducting and documenting a full/complete investigation of all emergency situations.

ITEM 6:

Section V. 2 shall be revised as follows:

a. A Combustible Gas Indicator (CGI)/Lower Explosive Limit (LEL) meter shall be used to determine the extent of the vapor cloud:

1) only OQ qualified Pipeline Operators are authorized to use a CGI/ LEL meter;

2) HVLs will immediately turn into a vapor cloud when released into the atmosphere;

3) HVLs are heavier than air and will therefore hover down close to the ground and travel downhill unless they are pushed by the wind;

4) HVLs, when mixed with air will create a potential flammable, combustible, or explosive mixture; and

5) HVL/air mixtures will explode when exposed to an ignition source.

b. The Pipeline Operator will determine the safe distance from the source of the release by going downwind from the leak to a point where there is a "0" reading on the their CGI/LEL meter; exposure radius.

c. All public residences within the exposure radius of the leak will need to be evacuated.

d. If the leak catches fire, no attempt will be made to put the fire out; the safest scenario will be to extinguish peripheral fires and let the leak burn itself out.

e. All applicable roads through the exposure radius must be blocked to prevent traffic.

f. The Pipeline Operator shall maintain contact with the Pipeline Supervisor, or their designate, and keep them informed of the actions being taken.

g. The Pipeline Operator shall also maintain contact with all emergency responders (ie: fire, police, public officials, medical services, etc.).

ITEM 7:

Section VII. D shall be revised as follows:

3. Emergency Response; Continuing Training Plan.

All Pipeline Operators MUST maintain an up-to-date/current understanding of the actions they need to take in an emergency situation. Pipeline Operators are authorized/trained to take appropriate action in all emergency situations.

a. All Pipeline Operators will be trained in the requirements of the Emergency Response Plan:

1) upon initial assignment and

2) annually thereafter.

b. Emergency response training shall include all actions required/ related to their individual assignments.

c. Emergency response training shall include a measurement of their performance during various scenarios.

d. Emergency response training will include drills (recommended annually).

e. All emergency response training shall be documented.

f. Pipeline Operators will be immediately trained in all changes made to the Emergency Response Plan.

ITEM 8:

Section VII. D. 3 shall be revised as follows:

g. At intervals not exceeding 15 months, but at least once each calendar year, each Pipeline Operators performance shall be evaluated to ensure it meets the objectives of the emergency response training program. This evaluation shall be documented.

ITEM 9:

Section VII. D shall be revised as follows:

h. At intervals not exceeding 15 months, but at least once each calendar year, each Pipeline Supervisor shall be evaluated to ensure they maintain a thorough knowledge of the emergency response procedures they are responsible for. This evaluation shall be documented.

ITEM 10:

Section VIII. B shall be revised as follows:

d. All valves necessary for the safe operation of the pipeline shall be inspected at least twice each calendar year, at intervals not exceeding 7 ½ months (See Pipeline Drawing). All inspections shall be documented.

ITEM 11:

Section VII. G shall be revised as follows:

All relief valves shall be checked for adequate capacity at intervals not to exceed 7 ½ months, but at least twice each calendar year. All checks shall be documented.

ITEM 12:

Seminole's Operator Qualification Plan (OQP) shall be revised as follows:

NOTICE: Please be advised that all Pipeline Operators will be re-evaluated in each of their required covered tasks at least once every three years.

ITEM 13:

Seminole's OQP shall be revised as follows:

NOTICE: The Administrator (PHMSA) shall be notified whenever the Company Pipeline Operator Qualification Program is significantly modified.

ITEM 14:

Seminole's OQP shall be revised as follows:

NOTICE: Please be advised that on-the-job performance may not be used as the sole method of evaluation.