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December 4, 2015

Chris Hoidal
Director, Western Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Avenue, Suite 110
Lakewood, Colorado 80228

Re: CPF 5-2015-0016M

Attached please find Hilcorp Alaska LLC's amended procedures and forms in response to NOA CPF 5-2015-0016M.

Please feel free to contact me at (907) 777-8430 or emckay@hilcorp.com if further information is needed.

Sincerely,

HILCORP ALASKA, LLC

Erin M McKay

Digitally signed by Erin M McKay
DN: cn=Erin M McKay, c=US, o=Hilcorp Alaska LLC, ou=Facilities Engineering, email=emckay@hilcorp.com
Date: 2015.12.04 18:06:58 -09'00'

Erin McKay
Regulatory Compliance Manager
Alaska Integrity Group

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P-192.615: Emergency Response

Description	This procedure provides guidelines personnel will follow in order to effectively respond to an emergency.	
Regulatory Applicability	☒ Regulated Transmission Pipelines ☒ Regulated Gathering Pipelines (Type A) ☒ Regulated Gathering Pipelines (Type B) ☒ Regulated Distribution Pipelines	
Frequency	Any time an emergency is suspected	
Reference	49 CFR 192.615	Emergency Plans
Forms	F-192.615 F-192.615(b)(2)	Handling Emergencies Emergency Response Training Form
Related Specifications	Pipeline-Specific Operations Manual Gas Piping Technology Committee: Guide for Gas Transmission and Distribution Piping Systems (BSR GPTC Z308.1-2009 TR05-01-200X)	
OQ Covered Tasks	The covered task list should be reviewed to determine which if any of the covered tasks are being performed when responding to the emergency. Examples of tasks that may be required when following this procedure are: CT 10--Inspecting Buried Pipe When Exposed CT10.1--Inspect for mechanical damage on buried or submerged pipe CT10.2--Inspect for external corrosion on buried or submerged pipe CT10.3--Inspect the condition of external coating on buried or submerged pipe CT 13--Inspect Internal Pipe Surface (UT & Pit gauge) CT13.1--Visual Inspection of the Internal Pipe Surface CT19--Provide Temporary Marking if Buried Pipeline Prior to Excavation 19.1--Locate line 19.2--Install and maintain marker CT20--Inspection Following Excavation Activities and Leak Survey after Blasting CT20.1--Utilize leak survey techniques CT20.2--Monitor for pressure loss CT 21--Provide Security for Pipeline Facilities CT 30--Inspecting Existing Pipe Following Movement CT 39--Operations of Pipeline System CT39.1--Start-up of a pipeline CT39.2--Shutdown of a pipeline CT39.3--Monitor pressures, flows, communications and line integrity and maintain them within allowable limits	

CT39.4--Manually or remotely open or close valves or other equipment

CT39.5--Shipping and/or receiving pig in pipeline

CT 45--Performing Leakage Survey

CT45.1--Conduct vegetation survey

CT 45.2--Conduct a leak survey with a CGD

CT45.3--Conduct a leak survey with a flame ionization detector (FID)

CT 48--Purging a Gas Pipeline

(In order to perform the tasks listed above; personnel must be qualified in accordance with Hilcorp/Harvest Alaska's Operator Qualification program or directly supervised by a qualified individual.)

REVIEW AND REVISION LOG

This O&M Procedure shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes shall be made as necessary to ensure that the manual is current, complete, and effective.

Review and/or Revision Date	Reviewer	Revision Description
Revision 0 - June 2015	Ben Wasson	Initial Issue
Revision 1 - November 24 2015	Ben Wasson	Procedure revised to more fully comply with the requirements of §192.615(b), Emergency plans, including the addition of Form F-192.615(b)(2)

PROCEDURE STEPS

General

When using this procedure, it is the responsibility of the operator to remember that these are only general guidelines and one must use their best judgment at all times to protect people first and then the environment. It is also the operator's responsibility to take into consideration other emergency response guidelines (ex OSHA regulations). These should be considered and used to compliment the guidelines of this procedure throughout the emergency response.

Classification of Emergencies

In the event of an emergency, the Emergency Management Team will classify the situation under the category of Minor, Serious or Major.

Minor Emergency

A minor emergency is one that can be satisfactorily handled by company personnel and does not affect or threaten parties beyond the scope of the direct operations. A minor emergency would involve:

- Minor injuries to on-site personnel.
- Public safety is not threatened.
- Environmental impacts are confined to the location.
- No external assistance is needed.

Serious Emergency

A serious emergency is one that has implications beyond the control of local personnel. It would generally involve parties outside the direct scope of the operations including Government Agencies and outside contractors. A serious emergency would involve:

- Recordable and/or lost time injuries to multiple persons on site.
- Limited environmental impacts off-site with no long term effects.
- Potential or actual threat to public safety.
- Risk of reputational damage or media coverage.

Major Emergency

A major emergency is an incident having major safety, environmental, Governmental, economic or public welfare implications. A major emergency would involve:

- Multiple lost time injuries or a fatality
- Public health and/or safety has been or is threatened.
- Long term environmental effects expected.
- Environmental impacts are extended off site.
- Outside responders are involved.
- Major property damage.
- Media coverage expected.
- Potential reputational damage.

Required Information

When an employee discovers or is notified of a pipeline leak, break, or emergency situation that requires prompt and effective response, they should obtain the following information on form F-192.615:

- Name of person finding or reporting the leak or emergency situation;
- Telephone number and location where this person can be contacted;
- Description of emergency
- Severity of leak, break or emergency;
- Location of emergency;
- Cause of emergency;
- Description of injuries;
- Distance to nearest structure; and
- Damage to property or structure.

Specific Procedures

The following emergencies will be responded to immediately:

- Gas detected inside or near a building
- Fire located near or directly involving a pipeline facility
- Explosion Involving or Near a Company Pipeline
- Natural Disasters (such as earthquake, hurricane, tornado and severe flooding).

After steps have been taken to protect people first, then property, steps shall be taken to make safe any actual or potential hazard and to notify the appropriate public officials required.

Gas Detected In or Near a Building

Reports of gas detected in or near a building are considered emergencies and shall be responded to promptly and will take precedence over all non-emergency orders.

Detecting or Receiving Notice of the Leak

1. Report the suspected leak location to the Operations Manager immediately.
2. Evacuate all persons in the building.
3. In the event the leak may affect the public, immediately notify the appropriate public safety officials, businesses and the general public to initiate an evacuation.
4. Shut in the appropriate pipeline segment (and/or booster site if necessary) to cut off the gas supply using the Pipeline Specific Operation Manual (PSOM) Shutdown Procedure. Take the necessary steps to prevent ignition of the released gas. Utilize the appropriate personal protective equipment (PPE) and "back-up" personnel.
5. Determine if any persons are missing. Initiate rescue activities (as necessary). Re-entry into an area of unknown concentration of H_2S will require the use of self-contained breathing equipment and "back-up" personnel.

Operations Manager

1. Confirm that personnel and public safety precautions appropriate for the circumstances are being taken. Evacuate personnel and the public from the areas most likely affected by the gas released (i.e. roadblocks, ambient air testing).
2. Notify Management of the condition and actions to be taken.
3. Verify that public safety officials have been notified as necessary.
4. Ensure that additional personnel, equipment, tools and materials are dispatched as needed to the scene of the emergency.
5. Confirm that steps have been taken to stop the source of the release through the use of emergency shutdown systems or manual valves at safe locations.
6. Start an Emergency Log to collect data for required Agency reporting.
7. Coordinate Incident Command System with local public safety officials as necessary.
8. Confirm that the next level of supervision or designated alternate has the following information to provide notice to the appropriate agencies and to assure that the adequate safety precautions are being taken:
    a. Location of leak.
    b. Time of detection of the leak.
    c. Fatalities or personal injuries, if any.
    d. Cause of the leak.
    e. Amount and H_2S content of the gas released.
    f. Present location of the gas released and direction of travel.
    g. Possibilities of eminent danger or damage.
    h. Weather Conditions.
    i. Containment actions taken.
    j. Risk to the public.
9. Consult with Regulatory Compliance Specialist for required agency notifications.
10. Initiate site security measures.
11. Consider the need for specialized company assistance (i.e. Industrial Hygiene, Environmental, Security, etc.).

Fire located near or directly involving a pipeline facility

Discovering or Receiving Notice of the Fire

1. If you are the person discovering the explosion, confirm you are at a safe distance and call 911.
2. Contact the Operations Manager and advise of situation.
3. Discontinue all tasks in progress in the area (hot work, maintenance, etc.).
4. Evacuate personnel and the public from the area most likely affected by the fire (i.e. roadblocks).
5. If the fire threatens the public (roads, homes, businesses) call the necessary public safety officials (police, fire, ambulance, etc.) to assist in the emergency. Contact any businesses or public in the affected area to initiate an evacuation if necessary.
6. Shut in and depressurize the appropriate pipelines by engaging emergency shutdowns and/or manually closing the appropriate valves from a safe distance to isolate the fuel source using the Shutdown Procedures located in the PSOMs.
7. Continue measures to contain the fire, apply water to protect adjacent equipment from a safe distance.
8. Extinguish gas fires only if the source of the fuel can be stopped.

Operations Manager

1. Confirm that personnel and public safety precautions appropriate for the circumstances are being taken.
2. Notify Management of the condition and actions to be taken.
3. Verify that public safety officials have been notified as necessary.
4. Confirm that steps have been taken to stop the source of the release through the use of emergency shutdown systems or manual valves at safe locations.
5. Ensure that the appropriate personnel, equipment, tools and materials are dispatched as needed to the scene of the emergency.
6. Start an Emergency Log to collect data for required Agency reporting.
7. Contact the next level of supervision and advise of the situation.
8. Coordinate Incident Command System with local public safety officials as necessary.
9. Confirm that the next level of supervision or designated alternate has the following information to provide notice to the appropriate state and federal agencies and to assure that the adequate safety precautions are being taken:
    a. Location of fire.
    b. Time of discovery.
    c. Fatalities or personal injuries, if any.
    d. Cause of the fire.
    e. Present location of the fire and direction of travel.
    f. Amount and H_2S content of the gas released.
    g. Possibilities of eminent danger or damage.
    h. Weather Conditions.
    i. Containment actions taken.
    j. Risk to the public.
10. Consider the need for specialized company assistance, i.e. Industrial Hygiene, Environmental, Security, etc.
11. Consult with Regulatory Compliance Specialist for required agency notifications.
12. Initiate site security measures as required.
13. Safely reinstate operations when the state of emergency is over.

Explosions Involving or Near a Pipeline Facility

Discovering or Receiving Notice of the Explosion

1. If you are the person discovering the explosion, confirm you are at a safe distance and call 911.
2. Report the explosion to the Operations Manager from a safe distance.
3. Check for possible sources of ignition close by.
4. Where it is safe to do so; evacuate all persons in the immediate area by an escape route upwind of the released materials.
5. In the event of an explosion, which has affected or may affect the public, immediately notify the appropriate public safety officials (police, fire, ambulance, etc.), businesses and the general public to initiate an evacuation of the area.
6. Shut in and depressurize the appropriate pipelines and facilities by engaging emergency shutdowns and/or manually closing the appropriate valves from a safe distance to isolate the source using the Shutdown Procedures located in the PSOMs.
7. Take the necessary steps to prevent ignition of the released material.
8. Utilize the appropriate PPE and "back-up" personnel.
9. Determine all persons are accounted for.

Operations Manager

1. Confirm that personnel and public safety precautions are appropriate for the circumstances and are being taken. Ensure that personnel and the public are evacuated from the areas most likely affected by the released materials (i.e. roadblocks, ambient air testing).
2. Notify Management of the condition and actions to be taken.
3. Verify that public safety officials have been notified as necessary.
4. Ensure that the appropriate personnel, equipment, tools and materials are dispatched as needed to the scene of the emergency.
5. Confirm that steps have been taken to stop the source of the release through the use of emergency shutdown systems or manual valves at safe locations.
6. Start an Emergency Log to collect data for required Agency reporting.
7. Coordinate Incident Command System with local public safety officials as necessary.
8. Confirm appropriate personnel have the following information which is necessary for reporting to the appropriate state and federal agencies and to assure that the adequate safety precautions are being taken:
    a. Location of explosion.
    b. Time of occurrence or discovery of the explosion.
    c. Fatalities or personal injuries, if any.
    d. Cause of the explosion if known.
    e. Amount and type and of material released.
    f. Present location of materials released and direction of travel.
    g. Possibilities of eminent danger or damage.
    h. Weather conditions.
    i. Containment and clean-up actions taken.
    j. Risk to the public.
9. Verify that appropriate environmental protection measures are being taken (igniting the released gas, diking, skimmers, etc.) and that the appropriate external contacts have been made.
10. Consider the need for specialized company assistance (i.e. Industrial Hygiene, Environmental, Security, etc.).
11. Consult with Regulatory Compliance Specialist for required agency notifications.
12. Initiate site security measures.

Natural Disasters

Earthquake

1. During an earthquake, all Hilcorp/Harvest personnel are to first protect themselves. When the ground shaking stops, the actions listed below are to be taken.
2. If a release or a fire results, take action in accordance with the applicable Hilcorp procedures.
3. Evaluate the extent of the emergency.
4. Shut in the affected pipelines if necessary by engaging the emergency shutdowns and/or manually closing the appropriate valves using the Shutdown Procedures located in the PSOMs.
5. Divide the pipeline system among available personnel and conduct a thorough search of the system for ruptures, leaks, and equipment failures.
6. Contact the Operations Manager and advise of situation and any need for repairs or other assistance.
7. Contact local public safety officials as required.
8. Conduct a thorough follow-up inspection for residual safety hazards while observing the need for personal protective equipment.

9. Arrange for necessary repairs.
10. Safely reinstate operations when the state of emergency is over.

Severe Weather/Tornado

1. When severe weather is approaching the area, the following actions are to be taken:
2. Alert Hilcorp/Harvest personnel of the presence of severe weather.
3. Instruct personnel to seek cover. Do not seek refuge in processing areas or vehicles.
4. Shut in the affected pipelines if necessary using the Shutdown Procedures located in the PSOMs.
5. After the storm has passed, conduct a thorough search of the system for ruptures, leaks, and equipment failures.
6. Contact local public safety officials as required.
7. Contact the Operations Manager and advise of situation and any need for repairs or other assistance.
8. Conduct a thorough follow-up inspection for residual safety hazards while observing the need for PPE.
9. Arrange for necessary repairs.
10. Safely reinstate operations when the state of emergency is over.

Natural Disaster – Severe Flooding

1. Hilcorp/Harvest personnel should first protect themselves when severe flooding is in the area
2. Evaluate the accessibility of pipeline facilities that may be in jeopardy
3. Determine if pipeline facilities have become submerged and in danger of being struck by vessel or debris
4. Deploy operating personnel in positions to take emergency action
5. Contact local public safety officials as required.
6. Contact the Operations Manager and advise of situation and any need for repairs or other assistance.
7. Conduct a thorough follow-up inspection for exposed pipe, and other residual safety hazards while observing the need for PPE.
8. Arrange for necessary repairs.
9. Safely reinstate operations when the state of emergency is over.

Determining the End of an Emergency

1. The highest-ranking Hilcorp/Harvest employee at the scene of an emergency will be responsible for determining when an emergency situation is over.
2. The end of an emergency should be communicated to all employees responding to that emergency, Management, and to the public and emergency agencies responding to the emergency. The minimum criteria listed below must be met before declaring the end of an emergency
    a. Company facilities no longer pose a threat to the public, employees or property.
    b. Any fires resulting from the incident have been extinguished.
    c. Natural gas or other products are no longer being released to the atmosphere, ground or water.
    d. The probability of additional releases of natural gas or other products are unlikely.
    e. The incident scene is secure from any unauthorized entry.
    f. Service outages have been safely restored.

Investigation after Emergency

After each emergency, the Local Operations Manager, Control Center Supervisor, and Regulatory Compliance Specialist will evaluate the incident by:

- Selecting a sample of the failed pipe or equipment for laboratory examination,
- Interviewing all personnel participating, and
- Reviewing the emergency procedures

All investigations shall be performed as soon as possible following the emergency to help prevent another recurrence. This review will be documented on Form F-192.615: Handling Emergencies. The Regulatory Compliance Specialist is responsible for updating the appropriate procedures and/or manuals, communicating any changes made, and distributing the changes to all appropriate personnel.

Training

All appropriate employees and contractors shall be informed, instructed, and trained in executing the emergency procedures. Training may include classroom discussions on the procedures to be followed or field demonstration. Documentation of compliance will be on *F-192615(b)(2), Emergency Response Training Form*. Hilcorp management shall verify the effectiveness of this training.

Employee activities after a qualified incident shall be reviewed to determine whether the procedures were effectively followed and response times were adequate. Additional training shall be implemented if needed.

Liaison with Public Officials

In accordance with Hilcorp/Harvest Alaska's Public Awareness Program, regular meetings and/or exercises are conducted with public officials/agencies in the vicinity of the pipeline. Methods of establishing and maintaining emergency communication and coordination are pre-planned in these meetings. The purpose of these meetings will be to:

- Review Hilcorp/Harvest's Emergency Response Plan and to identify the types of gas pipeline emergencies requiring notification of public officials.
- Acquaint public officials with Hilcorp/Harvest's ability to respond to gas pipeline emergencies.
- Allow Hilcorp/Harvest's to learn about the responsibilities and resources of appropriate government organizations such as Fire and Police Departments.
- Plan how Hilcorp/Harvest and public officials can engage in mutual assistance to minimize hazards to life or property. A record of material covered and attendees, including Company representatives conducting the meeting, shall be maintained

F-192.615: Handling Emergencies

When to Use This Form	This form is used to document notifications of emergencies and emergency procedure review. It should be used in conjunction with the Emergency Plan as well as Procedure P-192.615: Emergency Response.
Reviewed Procedures	☐ P-191.5 Reporting Incidents ☐ P-191.23 Reporting Safety-Related Conditions ☐ P-192.615 Emergency Response The applicable sections of the above procedure(s) shall be reviewed prior to completing this form.
Documentation Procedure	1. Document initial call. Refer to Procedure P-192.615. 2. Document calls to fire, police and governmental agencies. 3. After the emergency is complete, review the procedures used to determine their effectiveness. Let the Regulatory Compliance Manager know of procedural changes that need to be made. 4. Place original in DOT File 192.615. Retain for 3 years. 5. Refer to Procedure P-191.5: Reporting Incidents to determine if this emergency constitutes a reportable accident or to Procedure P-191.23: Reporting Safety-Related Conditions to determine if it is a safety-related condition. If so, complete Form F-191.1: Incident Notification, Reporting and Investigation Packet or Form F-191.25: Safety-Related Condition Report respectively.

Receiving a Call Reporting a Potential Emergency		
Caller Info	Name:	Phone:
	Address:	
Type of Emergency: ☐ Gas Detected Inside/Near Building ☐ Fire Located Near or involving a pipeline facility ☐ Explosion near or involving a pipeline facility ☐ Natural Disaster		
Location of the emergency:	Nearest Town:	
Time of Emergency: Date: Time:		
Distance to the nearest structure:		
Describe the emergency:		
Cause of emergency:		
Are there injuries? ☐ No ☐ Yes If YES, what type?		
Weather	Wind direction From: To:	Wind speed:
	☐ Fog ☐ Rain ☐ Snow ☐ Other:	
Does this situation require immediate response (as determined by Hilcorp/Harvest Alaska personnel)? ☐ No ☐ Yes; by whom?		

Action	Dispatched to:		Time:
	Relayed to:		Time:
	Referred to:		Time:
Call taken by:			Time:

External Notifications Made				
Agency/Org. Name	**Phone**	**Called by**	**Date/Time**	**Comments**

Procedure Review	
Type of emergency:	Date of emergency:
Did the operations personnel follow written procedures for this emergency?	
☐ Yes	
☐ No; explain	
Was emergency training provided adequate in handling the emergency?	
☐ Yes	
☐ No; explain	

Do the written procedures adequately address this abnormal operation?
☐ Yes
☐ No; list required revisions below:

Procedure	Revision Needed

Review completed by:	Date:

F-192.615(b)(2): Emergency Response Training Form

When to Use This Form	This form is used in conjunction with Procedure P-192.615: Emergency Response to document the review of the Emergency Response Procedures.
Reviewed Procedures	☐ P-192.615 Emergency Response The applicable sections of the above procedure(s) shall be reviewed prior to completing this form.
Documentation Procedure	1. Review the Emergency Response Procedure and make any necessary changes. 2. Ensure all needed changes are made to the Operations & Maintenance Manual. 3. Place in file 192.615.

Personnel Information:		
Name:		
Title:		
Training:		
Training was conducted by: ☐ Classroom Discussions ☐ Field Demonstration ☐ Other:		
Specific Emergency Procedure:	**Date Reviewed:**	**Comments/Corrective Actions:**
Gas detected inside or near building.		
Fire located near or directly involving a pipeline facility.		
Explosion involving or near a pipeline		
Natural disasters		
Other:		

Effectiveness Review:	
Are the regulatory code citations accurate?	☐Yes ☐ No Comments:
Are any referenced publications incorporated by reference accurate?	☐Yes ☐ No Comments:
Are any referenced company standards accurate?	☐Yes ☐ No Comments:
Is the procedure sufficient to achieve and maintain compliance with the regulatory code?	☐Yes ☐ No Comments:
Is the procedure current, accurate and complete such that it is effective in meeting its intended purpose?	☐Yes ☐ No Comments:
Review completed by:	Date: