

DOT PIPELINE EMERGENCY RESPONSE FORUM

## The Pipeline Operator's Perspective



**Susan D. Waller**

*Vice President, Stakeholder Outreach, Spectra Energy*

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# What are the Regulations?

**Natural Gas:** 49 CFR § 192.615  
**Hazardous Liquid:** 49 CFR § 195.402

## *Natural gas pipeline operators are required to:*

- Establish written procedures to minimize the hazard resulting from a gas pipeline emergency (minimum requirements defined in code)
- Establish and maintain liaison with appropriate fire, police, and other public officials to:
  - Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;
  - Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;
  - Identify the types of gas pipeline emergencies of which the operator notifies the officials; and
  - Plan how the operator and officials can engage in mutual assistance to minimize hazards to life and property.

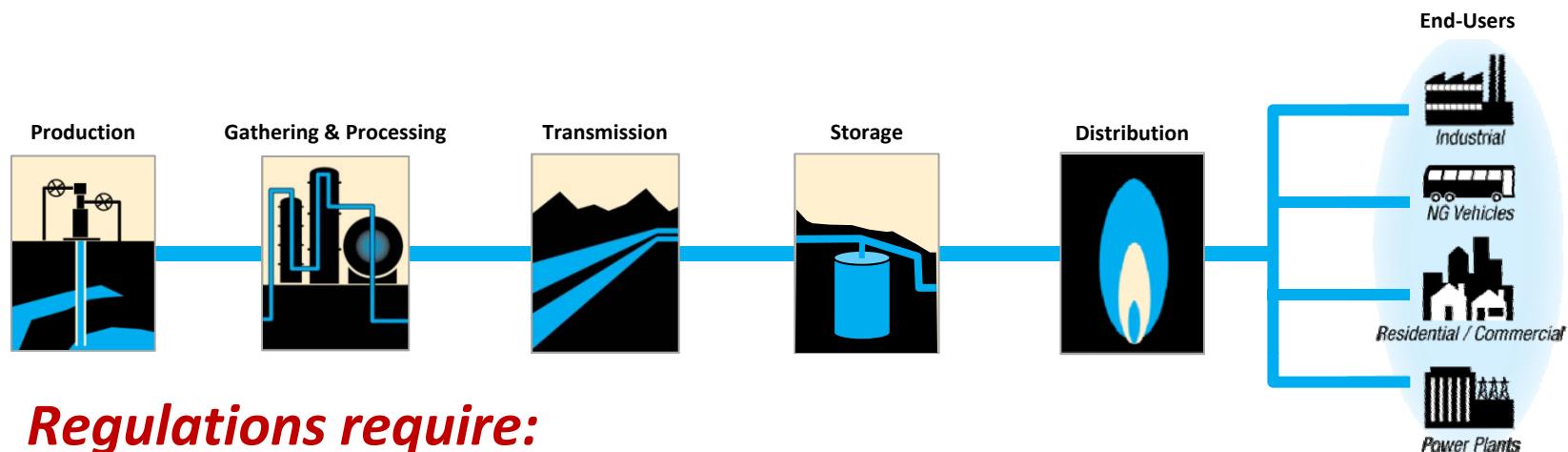
## *Similar requirements for hazardous liquid pipeline operators*

*API RP 1162 incorporated by reference in:*  
**Natural Gas:** CFR 49 § 192.616  
**Hazardous Liquid:** CFR 49 § 195.440

*Pipeline operators must comply with American Petroleum Institute Recommended Practice – API RP 1162*

- Operators should communicate the following to emergency responders:
  - Location of transmission pipelines that cross their area of jurisdiction and how to get detailed information regarding those pipelines
  - Name of the pipeline operator and the emergency contact information for each pipeline
  - Information about the potential hazards of the subject pipeline
  - Location of emergency response plans with respect to the subject pipeline
  - How to notify the pipeline operator regarding questions, concerns, or emergency
  - How to safely respond to a pipeline emergency
  - An overview of what operators do to prevent accidents and mitigate the consequences of accidents when they occur
  - How to contact the pipeline operator with questions or comments about public safety, additional overview information on Integrity Management Programs to protect High Consequence Areas under their jurisdiction, land use practices, emergency preparedness or other matters
- Communication is required annually with periodic liaison meetings

# Communicating with Emergency Officials Along the Pipeline



## ***Regulations require:***

### ***Information provided annually:***

- Pipeline purpose & reliability
- Hazard awareness & prevention measures taken
- Emergency response materials
- Pipeline location; National Pipeline Mapping System information
- Contact information

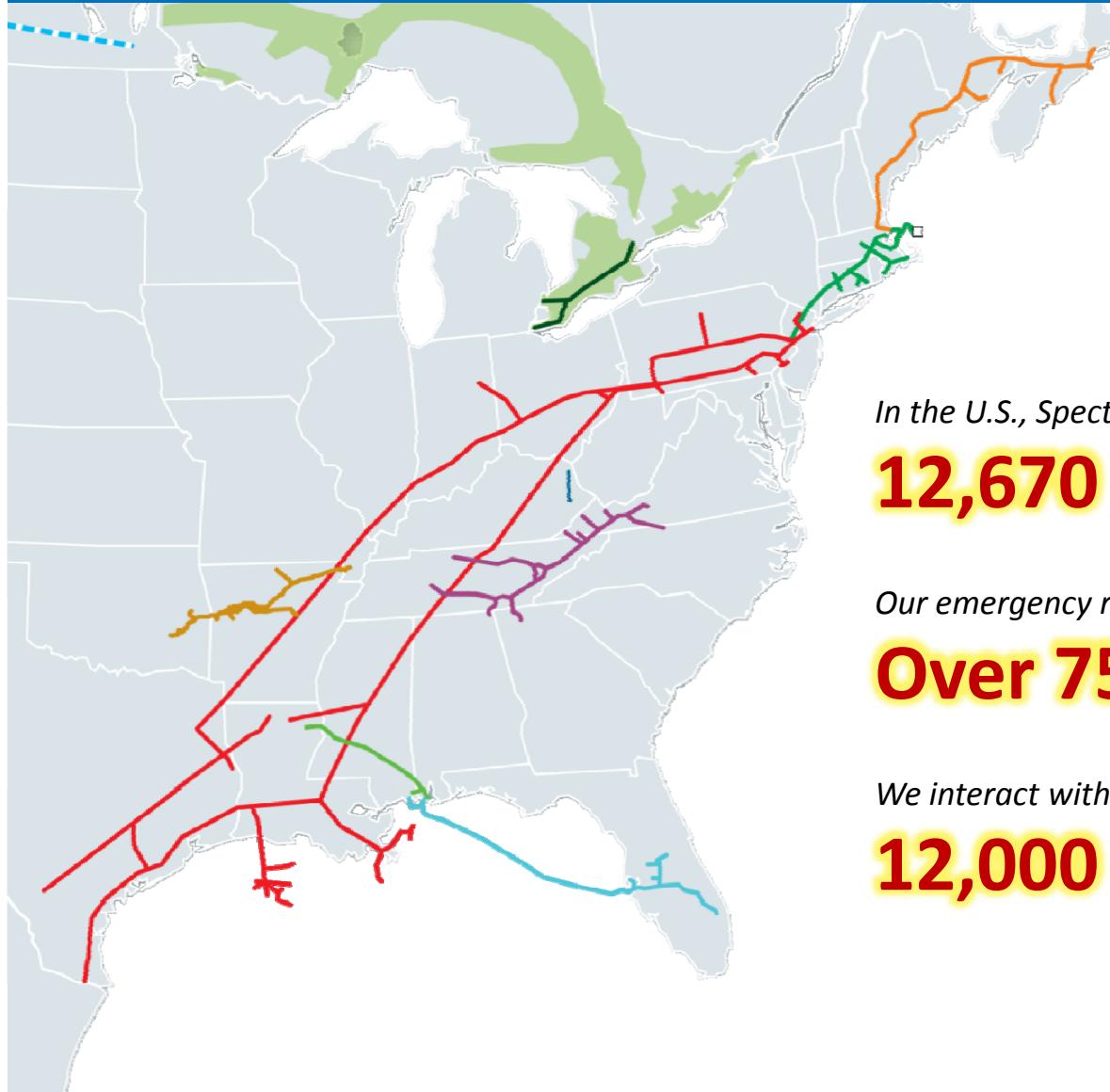
### ***Messages delivered by:***

- In person
- Targeted distribution of printed material
- Group meetings
- Phone calls with follow-up print materials

*Also:*

- Tabletop emergency drills
- Facility tours & open houses

# Spectra Energy's U.S. Emergency Responder Outreach



*In the U.S., Spectra Energy operates*

**12,670 miles of pipe**

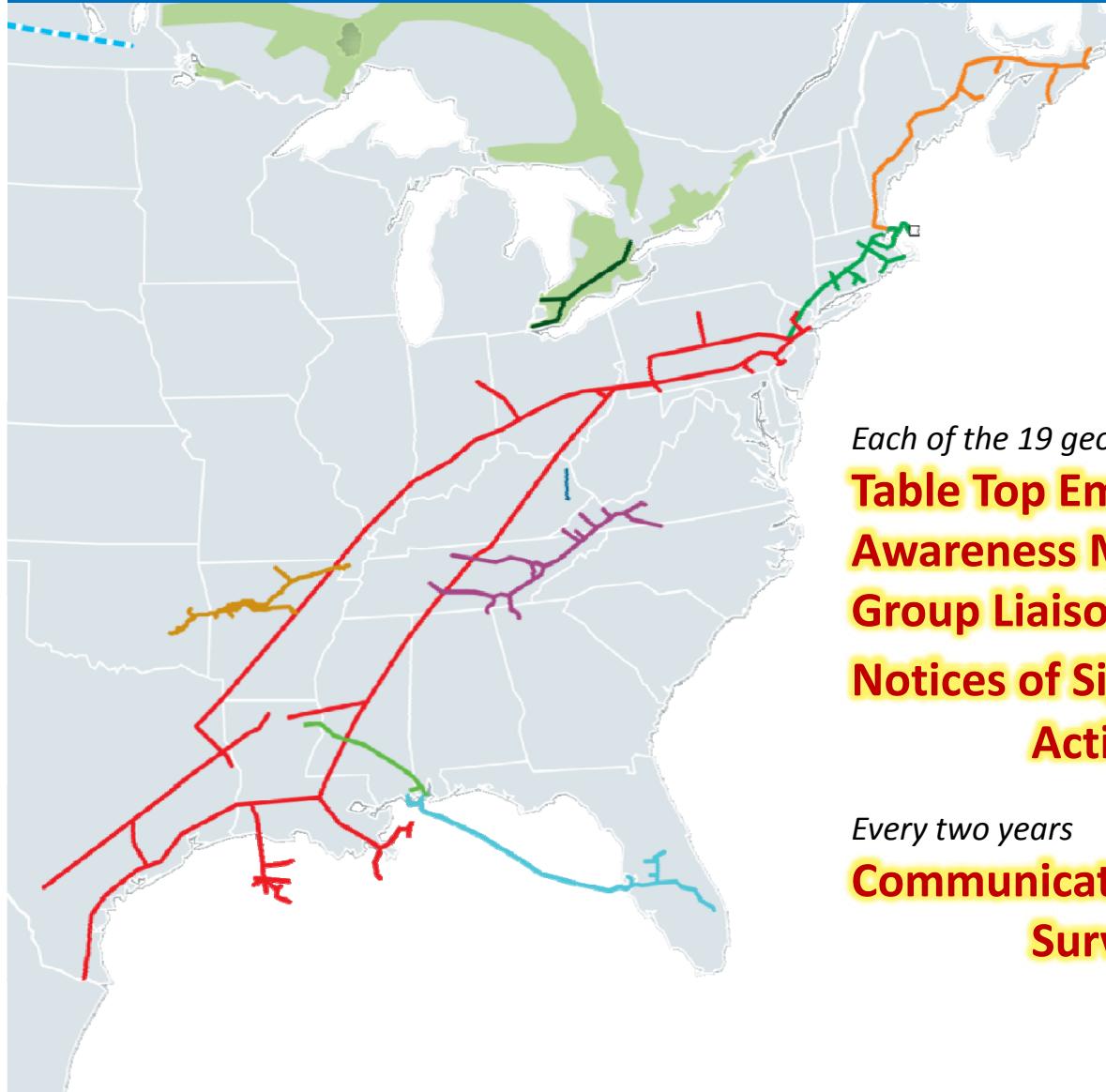
*Our emergency responders are*

**Over 75% volunteers**

*We interact with*

**12,000 emergency groups**

# Spectra Energy's U.S. Emergency Responder Liaison Activities



*Each of the 19 geographic areas conduct each year*

**Table Top Emergency Drills**

**Awareness Mailings & Feedback Cards**

**Group Liaison Meetings**

**Notices of Significant Local Maintenance Activities**

*Every two years*

**Communication (API) Effectiveness Surveys**

# Our Public Awareness Program

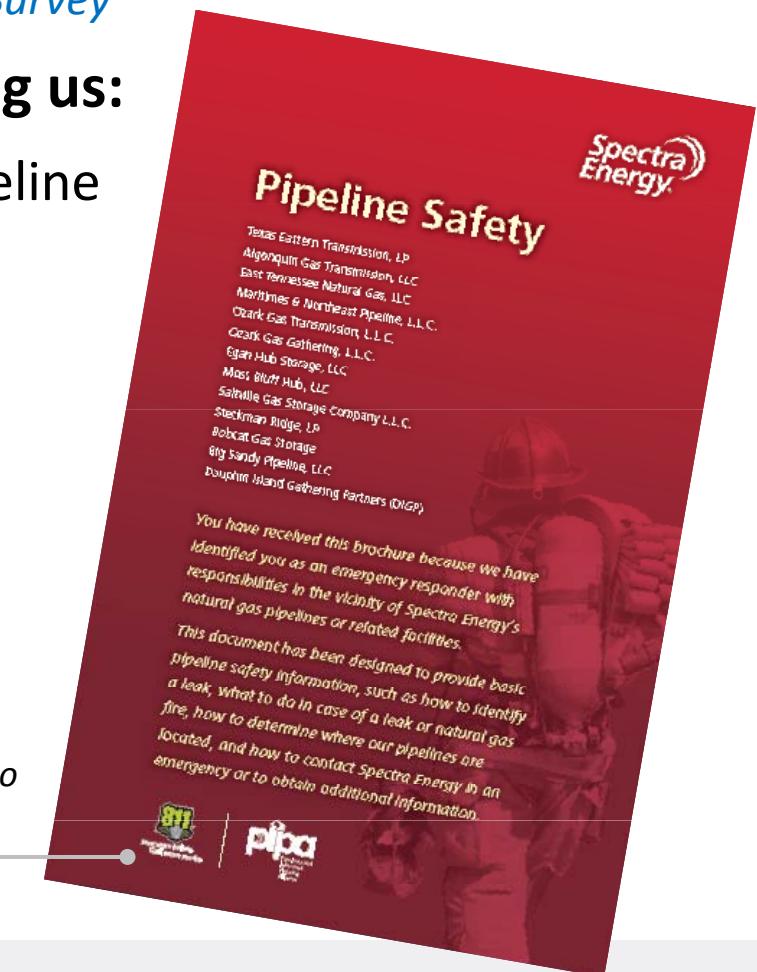
***Our public awareness program is designed to meet or exceed regulatory requirements***

*Results from 2011 Pipeline Awareness Effectiveness Survey*

## What Emergency Responders are telling us:

- **90+%** are aware and informed of our pipeline in their community
- **80+%** recall receiving information about our pipeline
- **78%** have a response plan for pipeline emergencies
- **60%** will call us in the event of a leak

*Our pipeline safety emergency brochure is mailed to  
**12,000 stakeholders***



# Our Outreach Activities

***Our outreach activities go beyond compliance to improve performance:***

- Developed emergency response guides delivery first quarter 2012
- Assisted in DOT's revision of 2012 Emergency Responder Guidebook
- Engaging and partnering with responders through workshops
- Participating in fire service national conferences
- *Listening to emergency responders:*
  - Aim for one stop shopping
  - Build a National coalition
  - Take response planning to next level
  - Identify plans for nearby facilities difficult to evacuate
  - Be more direct about what to do in the event of an incident



# Emergency Response Guide

## How We Communicate Risk



### Content of the Emergency Response Guide

- Where the pipelines are located (county map)
- Who the company local contacts are (name, phone number)
- What product is in the pipeline
- What the operating pressure is and diameter of pipe
- What first responders should do when responding to pipeline emergencies
- What the company will do when responding to pipeline emergencies
- The company's commitment to the incident command structure
- Properties of natural gas
- Overview/Elements of pipeline operations

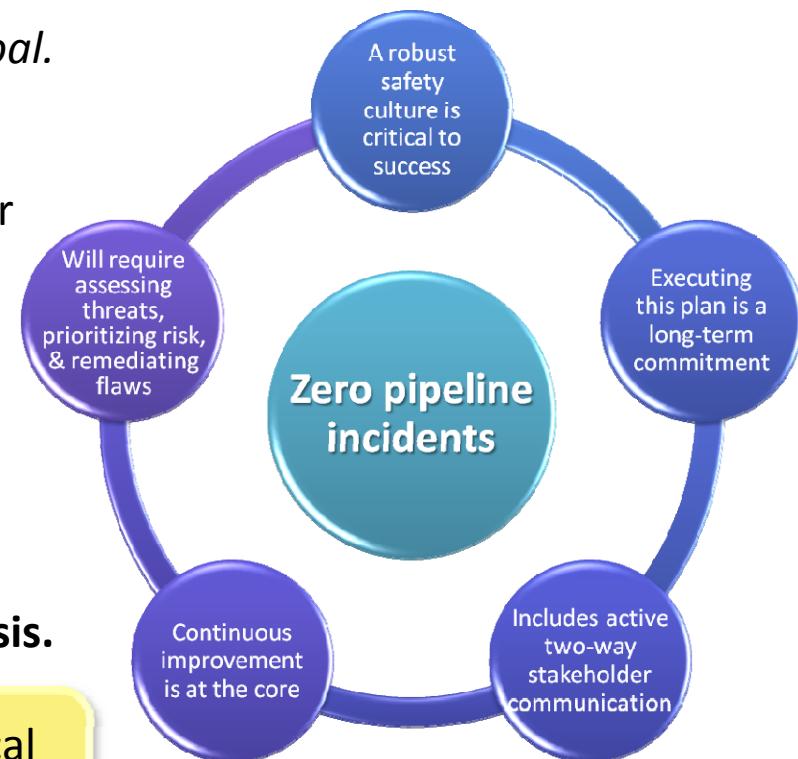


# What We Ask of Emergency Responders

- Help us drive down risk
- Know pipeline locations in your community
- Know local operators' first responders
- Collaborate & review operators' Emergency Response Guide
- Plan for sharing communications and logistics staging
- Identify high risk sites on pipelines
- Know each others' capabilities



- Our goal is zero incidents - a perfect record of safety and reliability for the national pipeline system. *We will work every day toward this goal.*
- We are committed to safety culture as a critical dimension to continuously improve our industry's performance.
- We will be relentless in our pursuit of improving by learning from the past and anticipating the future.
- We are committed to applying integrity management principles on a system-wide basis.
- We will engage our stakeholders from the local community to the national level - so they understand and can participate in reducing risk.



## Our Goal – Actions that Get Us to Zero

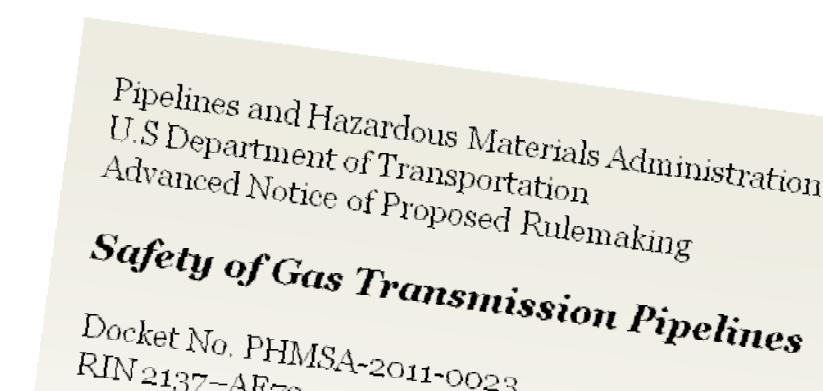
**INGAA filing November 2, 2011 - *Policy positions proposed...***

### At the Operator level:

- Incident Mitigation Management (IMM) plans to improve mitigation performance and minimize overall incident impact

### At the National level:

- Develop a “coalition” to build a communication + training + preparedness System



Interstate Natural Gas Association of America  
Policy-Level Comments  
November 2, 2011

# INGAA's Integrity Management Continuous Improvement Action Teams



<b>1. Stakeholder Outreach</b>	Two-way communication with meaningful performance measures. Actively promote PIPA (Pipelines and Informed Planning Alliance)
<b>2. Risk Management</b>	Apply risk management concepts beyond High Consequence Areas (HCAs) with comprehensive threat analysis
<b>3. Integrity Management Tools</b>	Enhance corrosion control methods and anomaly management protocols
<b>4. Pipelines Built Prior to PHMSA Regulations</b>	Develop inventory and protocols to manage integrity
<b>5. Technology Development &amp; Deployment</b>	<ul style="list-style-type: none"><li>• Improve crack-detection tools &amp; management</li><li>• Work with PHMSA to produce a R&amp;D road map, and</li><li>• Define assessment alternatives for non-piggable lines</li></ul>
<b>6. Management Systems</b>	Apply safety culture principles to drive learning across the industry
<b>7. Emergency Preparedness Response</b>	Update isolation valves automation and enhance public awareness
<b>8. New Construction</b>	Fully implement the 2010/2011 INGAA Foundation Pipe and Construction Action Plans
<b>9. Storage</b>	Clarify regulatory oversight for storage facilities

# Summary

- Nothing less than relentless pursuit of improvement gets us to the goal of zero
- Application of risk management is central to our strategy
- Our success depends upon active engagement of all stakeholders
- We are taking the next steps
  - We are cognizant of public opinion
  - We will work cooperatively with all stakeholders
  - We want to focus on real improvements to safety

