



ENERGY TRANSFER

Transwestern Pipeline Company

***External Communications
with PHMSA and State
Agencies on Integrity
Management***

Code Reference :	Procedure No.: J.06	
49 CFR 192.909, 911, 933, 937, 943, 945, 949, and 951	Effective Date: <i>November 14, 2008</i>	Page 1 of 8

1.0 Procedure Description This Standard Operating Procedure (SOP) includes the communication processes required by the company’s Integrity Management Plan (IMP) for the specific audience of federal and state regulators.

2.0 Scope The purpose of this SOP is to identify the information and methods for communicating with the Pipeline and Hazardous Materials Safety Administration (PHMSA) or State Agencies regarding Integrity Management.

3.0 Applicability This SOP applies to all external communications with PHMSA and State Agencies performed by the integrity management group regarding the implementation of the IMP.

4.0 Frequency

Within 30 days of adopting change: Substantial changes to IMP Implementation

Within 30 days of adopting change: Significant Changes to the IMP or Schedule

Apply within 180 days before the end of the required assessment interval: Waiver for reassessment interval extension

180 days before conducting the assessment: Use of “Other” Technology, which provides an equivalent understanding

Within two months after June 30 and December 31 of each year: Reporting Semi-annual performance reports

As required: Safety concerns raised by regulators (PHMSA or State)

As requested: Providing IMP or risk analysis

As required: Requirements for assessments not completed by the assessment deadline

As required: Pressure reductions beyond 365 days

Continued on next page

Code Reference :	Procedure No.: J.06	
49 CFR 192.909, 949, 911, 937, 943, and 951	Effective Date: November 14, 2008	Page 2 of 8

**5.0
Governance**

The following table describes the responsibility, accountability, and authority of the operations described in this SOP.

Function	Responsibility	Accountability	Authority
All Operations	Pipeline Integrity Engineer	Principal Codes and Compliance Engineer	Director of Technical Services

**6.0
Terms and
Definitions**

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *A.01 Glossary and Acronyms*.

Terms	Definitions
“Other” Assessment Technology	The use of technology that is not an Inline Inspection (ILI) tool, an appropriate pressure test, or direct assessment. The technology must be demonstrated to provide an equivalent understanding of the condition of the pipe.

**7.0
Communications
with PHMSA and
State Agencies**

This SOP contains the following sections:

- Substantial Changes to IMP Implementation
- Significant Changes to the IMP or Schedule
- Waiver for Reassessment Interval
- Use of “Other” Technology
- Semi-annual Performance Reports
- Safety Concerns Raised by Regulators
- Providing IMP or Risk Analysis
- Regulatory Agency Contact Information

Continued on next page

Code Reference :	Procedure No.: J.06	
49 CFR 192.909, 949, 911, 937, 943, and 951	Effective Date: <i>November 14, 2008</i>	Page 3 of 8

**7.1
Substantial
Changes to
IMP
Implementation**

Substantial changes to the implementation of the IMP are reported to PHMSA or a State pipeline safety authority (in a State where PHMSA has an interstate agent agreement).

The Codes Engineer follows these guidelines to determine “substantial” changes to the implementation of the IMP.

Substantial changes to Implementation:

- Inability to identify HCAs
- Inability to identify threats
- Inability to identify and assess risk
- Inability to conduct integrity assessments
- Inability to develop a required section of the IMP
- Inability to meet remediation schedule. If the remediation schedule cannot be met, technical justification that public safety is not jeopardized is required.
- Inability to meet remediation schedule, and a temporary reduction in operating pressure or other action cannot be accomplished

Non-substantial changes to Implementation:

- Changes to individual HCAs such as due to occupancy changes
- Changes to individual threats
- Changes in individual risk assessment parameters
- Changes in integrity assessment schedules that still meet Rule requirements
- Changes in Integrity Compliance Activity Manager (ICAM) software or use

At the direction of the Director of Pipeline Integrity and Codes, the Codes Engineer reports any significant changes to the IMP or the schedule for carrying out the program elements using the following process below.

Step	Activity
1	GATHER and EVALUATE information.
2	DETERMINE if the change is “substantial.”
3	ACQUIRE verification and approval from the Director of Technical Services.
4	DEVELOP notification information.
5	DETERMINE method of submittal.
6	SUBMIT notification to PHMSA and/or required State Agencies.
7	RETAIN documentation of notification and PHMSA or State Agency response of acknowledgement.

Code Reference :	Effective Date: <i>November 14, 2008</i>	Procedure No.: J.06 Page 4 of 8
49 CFR 192.909, 949, 911, 937, 943, and 951		

**7.2
Significant
Changes to the
IMP or
Schedule**

Significant changes to the IMP or the schedule for carrying out the program elements are reported to PHMSA or a State pipeline safety authority in a State where PHMSA has an interstate agent agreement.

The Principal Codes and Compliance Engineer follows these guidelines to determine “significant” changes.

Significant changes:

- Changes in the form of the plan such as a conversion from a paper to an electronic format
- Changes to the Risk Assessment Model software vendor
- Changes in the assessment schedule that may result in non-compliance with rule requirements

Non-significant changes:

- Changes in software versions
- Changes in PHMSA protocol elements, unless identified as significant by PHMSA
- Development and implementation of program elements identified in the Integrity Management Framework Document(s)
- Changes in integrity assessment schedules that still meet Rule requirements

At the direction of the Director of Technical Services, the Principal Codes and Compliance Engineer reports any significant changes to the IMP or the schedule for carrying out the program elements using the following process below.

Step	Activity
1	GATHER and EVALUATE information.
2	DETERMINE if the change is “substantial.”
3	ACQUIRE verification and approval from the Director of Technical Services.
4	DEVELOP notification information.
5	DETERMINE method of submittal.
6	SUBMIT notification to PHMSA and/or required State Agencies.
7	RETAIN documentation of notification and PHMSA or State Agency response of acknowledgement.

Continued on next page

**External Communications
with PHMSA and State
Agencies on Integrity
Management**

Code Reference :	Procedure No.: J.06	
49 CFR 192.909, 949, 911, 937, 943, and 951	Effective Date: <i>November 14, 2008</i>	Page 5 of 8

**7.3
Waiver for
Reassessment
Interval**

The Pipeline Integrity Engineer may request a waiver from the re-assessment interval for the following:

- Lack of internal inspection tool
- Inability to maintain local gas supply if the re-assessment is conducted within the required interval

The Pipeline Integrity Engineer requests a waiver using the following process.

Step	Activity
1	GATHER and EVALUATE needed information for the waiver.
2	DETERMINE if requesting a waiver meets the appropriate requirements: <ul style="list-style-type: none"> • Actions are taken on the covered segment • Inspection tool is not available
3	DOCUMENT that local supply cannot be maintained.
4	ACQUIRE verification and approval from the Principal Codes and Compliance Engineer.
5	DEVELOP notification Information.
6	DETERMINE method of submittal.
7	SUBMIT notification to PHMSA and/or required State Agencies.
8	RETAIN documentation of notification and PHMSA or State Agency response of acknowledgement.

**7.4
Use of “Other”
Technology**

The Director of Technical Services must notify PHMSA or other appropriate regulatory authority about the use of “other” technology before conducting the assessment. The other technology must be demonstrated to provide an equivalent understanding of the condition of the pipe as if using one of the three (3) primary assessment methods.

Step	Activity
1	GATHER and EVALUATE information on other technology.
2	DETERMINE if the use of the “other” technology is necessary.
3	DEVELOP notification information.
4	DETERMINE method of submittal.
5	SUBMIT notification to PHMSA and/or required State Agencies.
6	RETAIN documentation of notification and PHMSA or State Agency response of acknowledgement.

Continued on next page

**External Communications
with PHMSA and State
Agencies on Integrity
Management**

Code Reference :	Procedure No.: J.06	
49 CFR 192.909, 949, 911, 937, 943, and 951	Effective Date: <i>November 14, 2008</i>	Page 6 of 8

**7.5
Semi-annual
Performance
Reports** The Principal Codes and Compliance Engineer reports the overall performance measures specified in *SOP J.07 Performance Metrics for Integrity Plan* to PHMSA or other State Agencies semi-annually. The reporting of the overall performance measures is made to the appropriate agency using the information specified in Section 7.8.

**7.6
Safety
Concerns
Raised by
Regulators** Safety concerns raised by regulators are addressed as required by the situation. The response and resulting communication to PHMSA is determined by the Director of Technical Services and APPROVED by the Vice President of Operations. If a specific response or time frame is not identified by the regulatory authority, it is determined by the Vice President of Operations.

**7.7
Providing IMP
or Risk
Analysis** The Principal Codes and Compliance Engineer shall provide a copy of the IMP or Risk Analysis to the PHMSA or an appropriate state pipeline safety authority when requested. This may be provided in electronic format or by other means.

**7.8
Regulatory
Agency Contact
Information** The Principal Codes and Compliance Engineer locates PHMSA contact information in the code 49 CFR 192.949 for contact regarding notifications for all communications EXCEPT the Semi-annual Performance Reports. The contact information for Semi-annual Performance Reports is located in 49 CFR 192.951.

The States in which State Agencies act as an interstate agent in which the company operates pipelines are Arizona, Michigan, and Ohio. Additional States with jurisdiction for direct sales laterals may also require contact.

The Department of Transportation (DOT) website contains a list of contact information for the appropriate State contacts.

Continued on next page

**External Communications
with PHMSA and State
Agencies on Integrity
Management**

Code Reference :	Procedure No.: J.06
49 CFR 192.909, 949, 911, 937, 943, and 951	Effective Date: <i>November 14, 2008</i> Page 7 of 8

8.0 Retain copies of all submittals and responses.
Documentation
Requirements

9.0 J.07 Performance Metrics for Integrity Plan
References

Continued on next page

**External Communications
with PHMSA and State
Agencies on Integrity
Management**

Code Reference :	Procedure No.: J.06
49 CFR 192.909, 949, 911, 937, 943, and 951	Effective Date: <i>November 14, 2008</i> Page 8 of 8

Appendix A: There are no Operator Qualification (OQ) tasks required for this procedure.
KSA and OQ
Task
Requirements
