



RECEIVED SEP 19 2011

September 15, 2011

Mr. David Barrett  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration  
US Department of Transportation  
901 Locust Street, Suite 462  
Kansas City, MO 64104-2641

**VIA Overnight Mail**

**CPF 3-2011-5007M**

Dear Mr. Barrett:

On March 1-3, 2011, representatives of the Western, Southwestern and Central offices of the Pipeline and Hazardous Materials Safety Administration (PHMSA) inspected the operation and maintenance procedures for SemGroup Corp at our offices in Oklahoma City, Ok. These procedures also apply to the facilities operated by SemStream and White Cliffs Pipeline, LLC.

Your Notice of Amendment dated June 9, 2011 identified several procedures which your inspectors felt required further clarification, modification and/or amendment. As noted in your letter, company personnel submitted amended procedures addressing all of the inspectors concerns. However, upon review of the revised procedures, your office felt that there were five procedures which required additional amendment. SemGroup has amended these five outstanding procedures as follows:

195.402 Procedure Manual for Operations, Maintenance and Emergencies

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(13) Periodically reviewing the work done by operator to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

The procedure for this requirement was inadequate because it just restated the code. SemGroup must provide for more clarification to indicate what they do to meet this requirement. On April 11, 2011, your personnel submitted amended procedures to address this. However, the procedures still do not meet the requirement of the code. The revised procedure indicates that the supervisors will do an annual review with the employee to discuss if the procedures in place are adequate for the employees to perform their jobs. They also indicate that this is documented on a Liquid Pipeline Maintenance Personnel Performance Checklist. This form and revised procedure does not include observation or review of the employee's work during execution of the normal operating and maintenance procedures for the purpose of evaluating the effectiveness of the procedure. While annual discussions with the employee regarding procedures is a good practice, the discussion by itself does not meet the requirement requiring a review of the personnel's work.



**RESPONSE:**

**SemGroup has amended their procedure to require that the work done by employees will be observed or reviewed (whichever is practical) on an annual basis. The observation/review will be conducted by their supervisor with the intention of determining the effectiveness of the procedures used by the employees.**

**Please see attached exhibit A, which includes modifications to SubPart F, Section 1, pages 32, 34, 35 and 36**

195.402 Procedure Manual for Operations, Maintenance and Emergencies

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(14) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line.

The procedure was inadequate because more clarification was needed within the procedure. For example, the procedure indicates that in an excavation, SemGroup personnel will take a gas detection reading daily before entering the excavation. Consideration should be given to taking continuous readings to ensure the excavation is safe. On April 11, 2011, your personnel submitted amended procedures addressing this. However, the procedure did not address the concern about the continuous monitoring of the excavation around a live line. Continuous monitoring of an excavation should be conducted because conditions change within the confines of the excavation during the day which can endanger company personnel.

**RESPONSE:**

**SemGroup has amended their procedure to include additional measures to take should atmospheric testing indicate any abnormalities and has also addressed the consideration for continuous atmospheric monitoring.**

**Please see attached exhibit B, which includes modifications to SubPart D, Section 2, pages 7 and 8 and SubPart F, Section 1, page 40.**

195.402 Procedure Manual for Operations, Maintenance and Emergencies

(d) Abnormal operation. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded;

(5) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

The procedure was inadequate because it needs to add more clarification and guidance to reflect what they do to meet this requirement. On April 11, 2011, your personnel submitted amended procedures addressing this. However, further review of the revised procedures identified the following issues. The procedures indicated that they meet this requirement with the Abnormal Documentation Log that is filled out by the controllers and reviewed by the control room manager. This is inadequate because it does not address the actions taken at the field location. The procedure also seems to specifically point



out that exceeding the MOP is the only reason to conduct a review. There are other abnormal operations where the company should conduct the review of the procedures.

**RESPONSE:**

**SemGroup has amended their procedures to more clearly explain the use of the Abnormal Documentation Log as well as to require an annual review by supervisors of their employee's response to abnormal operations and taking corrective action where deficiencies are found.**

**Please see attached exhibit C which includes revisions to SubPart F, Section 1, #5.1, page 32 and SubPart F, Section 2, #1 pages 15 and 16.**

195.402 Procedure Manual for Operations, Maintenance and Emergencies

(e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs;

(7) Notifying fire, police, and other appropriate public officials of hazardous liquid or carbon dioxide pipeline emergencies and coordinating with them preplanned and actual responses during an emergency, including additional precautions necessary for an emergency involving a pipeline transporting a highly volatile liquid.

The procedure was inadequate because it did not reference any of the highly volatile liquid (HVL) requirements. SemStream facilities are HVL facilities and the site specific emergency plans should be referenced by this section. On April 11, 2011, your personnel submitted amended procedures addressing this. However, the new procedures submitted still did not reference the SemStream facilities and the site specific emergency plans.

**RESPONSE:**

**SemGroup has amended their procedure to reference the site specific emergency plans.**

**Please see attached exhibit D which includes revision to Subpart F, Section 2, #8, page 31.**

195.402 Procedure Manual for Operations, Maintenance and Emergencies

(e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs;

(8) In the case of failure of a pipeline transporting a highly volatile liquid, use of appropriate instruments to assess the extent and coverage of the vapor cloud and determine the hazardous areas.

The procedure was inadequate because it did not reference any of the highly volatile liquid (HVL) requirements. The procedure to evaluate the extent and coverage of the vapor cloud and hazardous areas should fully reference other parts of the manual that readily identify actions taken. It should also indicate that appropriate instruments will be utilized to determine the extent and coverage of the vapor cloud. On April 11, 2011, your personnel submitted amended procedures addressing this. The amended procedure did not address instrumentation to be used for the size of the vapor cloud or reference the other parts of the manual addressing actions taken.



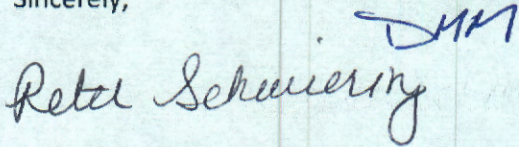
**RESPONSE:**

**SemGroup has amended their procedure to include the use of a combustible gas detector (CGI) to assess the extent and coverage of an HVL plume and has added additional detail in approaching an HVL release.**

**Please see attached exhibit E which includes revision to SubPart F, Section 2, #6, pages 29 and 30.**

SemGroup believes these amendments adequately address PHMSA's concerns. Should you have questions or require additional information please contact Edith Coen at 918-640-3384.

Sincerely,

The signature is written in blue ink and reads "Peter Schwiering". Above the signature, there are some initials that appear to be "JMM".

Peter Schwiering  
President  
SemGroup

Cc: David Minielly  
Ken Wages

Edith Coen

Dick Clary

Jim Zang



**Exhibit A**



## **5. Determining the Effectiveness of Normal Operation and Maintenance Procedures, Abnormal Operations Procedures and Emergency Response Training**

5.1 Annually, not to exceed 15 months, the work done by personnel will be observed or reviewed (whichever is practical) by their supervisor to determine the effectiveness of the procedures and training used in normal operation and maintenance activities, abnormal operations and emergency response. These observations/reviews will be conducted with the intention of determining the effectiveness of the procedures used by the employees and the training they have received. This review is documented using the forms included at the end of this chapter: "Exhibit F-Typical Liquid Pipeline Maintenance Personnel Performance Check List, Exhibit G – Typical Liquid Pipeline Operation Personnel Performance Check List and Exhibit H – Typical Pipeline Controller Performance Check List".

Corrective action will be taken with regard to the procedures where deficiencies are found and additional training will be conducted where deemed appropriate. Additionally, post accident/ near miss reviews will include a review of procedure(s) pertinent to the accident/near miss and any inadequacies in the procedure will be identified and corrected as part of this review. Should the review indicate that additional training is recommended for the employee(s) involved in the accident, it will be conducted.

5.2 Many of the tasks performed by personnel are considered "covered tasks" as defined in the Operator Qualification program. As such, employees are qualified on these tasks every three years. SemGroup participates in the API OQ work group and incorporates the procedures developed by subject matter experts associated with these covered tasks. The work group periodically reviews the procedures to ensure they are sufficient and appropriate and makes changes as needed.

Procedure modifications as a result of a Management of Change request will also be considered





**OPERATIONS, MAINTENANCE AND EMERGENCIES MANUAL**

**EXHIBIT F - LIQUID PIPELINE MAINTENANCE PERSONNEL PERFORMANCE CHECK LIST**

Employee Name:  
Location :

Job Title:

	Date	Supervisor's Initials
A. Has demonstrated proficient knowledge and performance of the following procedures:		
1. OME manual		
2. Safety procedures manual		
3. Emergency section - OME manual		
4. Site security		
5. Critical and environmentally sensitive areas		
6. Pipeline layout		
B. Has demonstrated the following are true:		
1. Recognizes emergency conditions and hazards		
2. Understands the emergency actions that must be taken in the event of a release in order to minimize the chance of fire, explosion, toxicity, or environmental damage		
3. Performs housekeeping and practices safe use of tools, equipment and facilities		
4. Understands the hazard communication plan for his areas of responsibility		
C. Has demonstrated the ability to do the following:		
1. Launch a scraper or sphere		
2. Receive a scraper or sphere		
3. Perform block valve and relief valve inspection		
4. Fill out the paperwork necessary for reporting repairs, fulfilling safety reporting requirements, and reporting changes to the piping system		
5. Locate and mark an underground pipeline		
6. Perform maintenance work on piping (This includes being able to isolate, evacuate, purge, electrically bond, vent, cut, assist a welder, perform an inspection, perform a pressure test, maintain a fire watch, and perform a start-up.)		
7. Be able to use a gas detector		
8. Isolate and pick up liquid spills on land		
9. Isolate and pick up liquid spills on water		
10. Patrol a right-of-way looking for excess vegetation and other potential obstructions and evidence of a release or other potential problems		
11. Use hoisting equipment properly and inspect		
12. Perform other inspections:		
a.		
b.		
c.		
d.		
13. Use personal-protective equipment (for respiratory, eye, head, hands, feet, and skin protection)		
14. Use the available fire-fighting equipment		
15. Operate the company's communication systems and use its procedures		
16. Use and care for hydrogen sulfide, oxygen, explosion meters, and other pertinent atmospheric measurement devices		

This confirms that the **performance** of \_\_\_\_\_ has been reviewed as a liquid pipeline maintenance person  
(employee's name)  
and that the **procedures used** by the employee are effective. If any procedures are identified that are not effective the procedure will be reviewed and modified.

Authorized Signature \_\_\_\_\_ Date: \_\_\_\_\_

Title \_\_\_\_\_





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**EXHIBIT G - LIQUID PIPELINE FIELD OPERATOR PERFORMANCE CHECKLIST**

Employee Name \_\_\_\_\_  
Employee No. \_\_\_\_\_

Job Title \_\_\_\_\_  
Location \_\_\_\_\_

A. Demonstrated proficient knowledge and performance of the following procedures:	Date	Supervisor's Initials
1. General duties		
2. Operating functions and responsibilities for locally controlled stations		
3. Operating functions and responsibilities for remotely controlled stations		
4. Maintenance functions and responsibilities		
5. Reporting functions and responsibilities		
6. Requirements for abnormal conditions		
7. Requirements for emergency conditions		
8. Effect of line break on adjacent stations		
9. Pump station layout		
10. Protective device settings		
11. Measurement equipment		
12. Maximum allowable pressure		
13. Characteristics of products being transported		
14. Pertinent reference manuals		
15. Valves and piping indicated on valve charts		
16. Critical and environmentally sensitive areas		
<b>B. Demonstrate the ability to do the following:</b>		
1. Perform normal pipeline operator duties		
2. Respond to abnormal and emergency conditions		
3. Respond to computer outages (assume local control)		
4. Determine if protective devices are functioning properly		
5. Operate station tankage and valve system		
6. Operate station control equipment		
7. Start and stop pumps		
8. Perform systems integrity check		
9. Clear trouble using the proper procedure		
10. Operate station auxiliary equipment		
11. Check safety equipment		
12. Perform the proper reporting functions in normal and emergency conditions		
13. Perform normal housekeeping and routing maintenance		
14. Operate communication equipment		
15. Use personal-protective equipment		
<b>C. Demonstrate the knowledge necessary for handling emergencies by being able to do the</b>		
1. Define alarm conditions		
2. Recognize prior conditions		
3. Predict consequences		
4. Take corrective action		
5. Shutdown a station or facility		
6. Isolate a station or facility		
7. Notify company personnel		
8. Notify local authorities		
9. Operate emergency shutdown systems		

This confirms that the performance of \_\_\_\_\_ has been reviewed as a liquid field pipeline operating person  
(employee's name)  
and that the procedures used by the employee are effective. If any procedures are identified that are not effective the procedure will be reviewed and modified.

Authorized Signature \_\_\_\_\_

Date: \_\_\_\_\_





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**EXHIBIT H - TYPICAL PIPELINE CONTROLLER PERFORMANCE CHECKLIST**

EMPLOYEE NAME \_\_\_\_\_  
 LOCATION \_\_\_\_\_

HAS DEMONSTRATED PROFICIENT KNOWLEDGE OF THE FOLLOWING:		DATE	INSTRUCTOR'S INITIALS
1.	Responsibility/authority		
2.	General duties		
3.	Pipeline system layout		
4.	Pump station layout		
5.	Protection device setting		
6.	Maximum allowable pressure		
7.	Characteristics and hazards of products transported		
8.	Hydraulic factors		
9.	Spill indications		
10.	Parameter settings		
11.	Regulatory agencies and jurisdiction		
12.	Power (kW and kW-h)		
13.	Critical and environmentally sensitive areas		

HAS DEMONSTRATED PROFICIENT PERFORMANCE OF THE FOLLOWING PROCEDURES:		DATE	INSTRUCTOR'S INITIALS
1.	Respond to abnormal and emergency situations		
2.	Respond to spill notification		
3.	Respond to computer outage		
4.	Loss/gain checks		
5.	Change the rate on the pipeline		
6.	Start and stop pumps		
7.	Switch deliveries into tanks		
8.	Switch originating stations		
9.	Switch delivery locations		
10.	Implement emergency plan		
11.	Coordinate and direct others in routine operations		
12.	Maintain operations in accordance with schedule		
13.	Advise maintenance personnel of monitored equipment malfunctions		
14.	Direct custody transfer measurements		
15.	Calculate space available in tanks		
16.	Track batches		
17.	Start up pipeline		
18.	Shut down pipeline		
19.	Recognize temperature and pressure relationships		

HAS DEMONSTRATED PROFICIENT KNOWLEDGE OF THE FOLLOWING EMERGENCY PROCEDURES:		DATE	INSTRUCTOR'S INITIALS
1.	Definition of alarm conditions		
2.	Recognize prior conditions		
3.	Predict consequences		
4.	Take corrective action		
5.	Pipeline shutdown		
6.	Pipeline isolation		
7.	Priority of alarms		
8.	Notification of appropriate personnel		
9.	Notification required for each regulatory agency		
10.	Coordination with field personnel		
11.	Restart of pipeline		
12.	Operate emergency shutdown		

This confirms that the **performance** of \_\_\_\_\_ has been reviewed as a liquid pipeline operating person  
 (employee's name)  
 and that the **procedures used** by the employee are effective. If any procedures are identified that are not effective the procedure will be reviewed and modified.

Authorized Signature \_\_\_\_\_ Date: \_\_\_\_\_



**Exhibit B**



- 9.2 The minimum width of ditch shall be 12 inches larger than the pipe size. A minimum distance of 12 inches shall be maintained between any two pipelines or other structure in the same ditch. The distance may be reduced to 4 inches if provisions for corrosion control are made. This shall include all excavation whether by ditching machine, power shovel, by hand, by blasting, or any other method that may be necessary to prepare the ditch for the pipe. The bottom of the ditch shall be free from rocks, clods, or other sharp-edged objects. The subgrade upon which the pipe is placed shall consist of material suitable for supporting the pipe without excessive settlement or stress development.
- 9.3 If rock, ledge, hardpan or boulders are present, the trench shall be undercut at least 4 inches and the undercut filled with soil that will provide a good bearing surface for the pipe. Small particle size material of 1/2 inch diameter or less will provide the proper bearing surface for the pipe.

## **10. Trench Safety**

Precautions should always be taken in excavated trenches to not only protect employees from trench caves-ins but also to protect personnel from the hazards of unsafe accumulations of vapor or gas. If construction is near or on a live line in the ditch, near a tie-in to a live line, or crosses a live line, the immediate area of the ditch shall be tested for gas accumulation both near and in the ditch daily prior to entering the ditch. The testing shall measure, at a minimum, LEL, oxygen and H<sub>2</sub>S. If any of these tests indicate readings outside the normal range, measures must be taken to eliminate the hazards prior to allowing personnel into the ditch. A commonly used measure is to ventilate the trench through the use of blowers and fans. Anytime there is the potential for vapors to re-occur, continuous atmospheric monitoring should be considered. Trenches are considered to become a confined space if their depth exceeds 4 ft. Trenches deeper than 4 ft which follow the excavation and trenching guidelines outlined in the SemGroup Safety Manual for sloping and benching are not considered confined spaces. Any ditch deeper than 4 ft is required to have a means of ingress/egress provided at least 25 ft in any direction from portions of the trench or bellhole which will be occupied during the maintenance or construction. Entry into *any* site is not allowed if LEL levels exceed 10%. Normally SemGroup personnel will not enter a trench or any other area if there is any level of LEL. Oxygen levels must be between





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19.5% and 21.5%. H<sub>2</sub>S readings must be below 15 ppm. If Oxygen or H<sub>2</sub>S readings are outside these limits a self-contained breathing apparatus, rescue harness and retrieval device shall be used. If an SCBA is used a standby person also equipped with an SCBA, must be present. Refer to the SemGroup Safety Manual located on the SemGroup intranet web site under 'manuals' for procedures concerning confined space entry, trenching and excavation and respiratory protection.



Excavation & Trenching Safety - Precautions should always be taken in excavated trenches to not only protect employees from trench caves-ins but also to protect personnel from the hazards of unsafe accumulations of vapor or gas. If construction is near or on a live line in the ditch, near a tie-in to a live line, or crosses a live line, the immediate area of the ditch shall be tested for gas accumulation both near and in the ditch daily prior to entering the ditch. The testing shall measure, at a minimum, LEL, oxygen and H<sub>2</sub>S. If any of these tests indicate readings outside the normal range, measures must be taken to eliminate the hazards prior to allowing personnel into the ditch. A commonly used measure is to ventilate the trench through the use of blowers and fans. Anytime there is the potential for vapors to re-occur, continuous atmospheric monitoring should be considered. Trenches are considered to become a confined space if their depth exceeds 4 ft. Trenches deeper than 4 ft which follow the excavation and trenching guidelines outlined in the SemGroup Safety Manual for sloping and benching are not considered confined spaces. Any ditch deeper than 4 ft is required to have a means of ingress/egress provided at least 25 ft in any direction from portions of the trench or bellhole which will be occupied during the maintenance or construction. Entry into *any* site is not allowed if LEL levels exceed 10%. Normally SemGroup personnel will not enter a trench or any other area if there is any level of LEL. Oxygen levels must be between 19.5% and 21.5%. H<sub>2</sub>S readings must be below 15 ppm. If Oxygen or H<sub>2</sub>S readings are outside these limits a self-contained breathing apparatus, rescue harness and retrieval device shall be used. If an SCBA is used a standby person also equipped with an SCBA, must be present. Refer to the SemGroup Safety Manual located on the SemGroup intranet web site under 'manuals' for procedures concerning confined space entry, trenching and excavation and respiratory protection.

1.3

## **2. Reduction Of Pressure**

Before any pipeline is lowered, the pressure shall be reduced to not more than 50 percent of the maximum operating pressure.

## **3. Pipe Movement and Public Warning (HVL ONLY)**

No HVL line may be moved unless the pressure in the line section involved is reduced to not more than 50 percent of the MOP or the lowest practical level



**Exhibit C**



## **5. Determining the Effectiveness of Normal Operation and Maintenance Procedures, Abnormal Operations Procedures and Emergency Response Training**

5.1 Annually, not to exceed 15 months, the work done by personnel will be observed or reviewed (whichever is practical) by their supervisor to determine the effectiveness of the procedures and training used in normal operation and maintenance activities, abnormal operations and emergency response. These observations/reviews will be conducted with the intention of determining the effectiveness of the procedures used by the employees and the training they have received. This review is documented using the forms included at the end of this chapter: "Exhibit F-Typical Liquid Pipeline Maintenance Personnel Performance Check List, Exhibit G – Typical Liquid Pipeline Operation Personnel Performance Check List and Exhibit H – Typical Pipeline Controller Performance Check List".

Corrective action will be taken with regard to the procedures where deficiencies are found and additional training will be conducted where deemed appropriate. Additionally, post accident/ near miss reviews will include a review of procedure(s) pertinent to the accident/near miss and any inadequacies in the procedure will be identified and corrected as part of this review. Should the review indicate that additional training is recommended for the employee(s) involved in the accident, it will be conducted.

5.2 Many of the tasks performed by personnel are considered "covered tasks" as defined in the Operator Qualification program. As such, employees are qualified on these tasks every three years. SemGroup participates in the API OQ work group and incorporates the procedures developed by subject matter experts associated with these covered tasks. The work group periodically reviews the procedures to ensure they are sufficient and appropriate and makes changes as needed.

Procedure modifications as a result of a Management of Change request will also be considered



## CHAPTER 5 PERIODICALLY REVIEWING THE RESPONSE OF OPERATORS TO DETERMINE THE EFFECTIVENESS OF ABNORMAL PROCEDURES

*Reference: Paragraph 195.402(d)(5)*

The following procedure shall be used for periodically reviewing the response of control room operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

### 1. Review of Procedures

Adequate procedures are mandatory to assure effective response to abnormal operation activity. Any abnormal operating condition is documented utilizing the "Abnormal Operation Documentation Log". This form is completed by the Pipeline Controller and given to the Control Room Manager for his review. Abnormal Operations include:

- Unintended Valve Closure
- Unintended Pump Shut Down
- Loss of Communication
- Operation of any safety device
- Increase or decrease in pressure or flow rate outside normal operating limits
- Any other malfunction of a component, deviation from normal operation, or personnel error which could cause a hazard to persons or property



The Controller notes whether or not the MOP of the pipeline was exceeded, and the highest pressure recorded. He also notes the actions he took as a result of the abnormal operation, what the suspected cause was, who he notified and actions taken to re-start the pipeline and verify normal operations (assuming it was re-started). The Control Room Manager reviews the log on a daily basis. His review considers whether appropriate procedures were followed by both field personnel and control room personnel and if safety devices performed as expected. This review determines if any deficiencies need to be corrected with equipment and/or procedures as well as any additional training that might be needed for the Pipeline Controllers. A formal Incident Investigation will be conducted for any MOP exceedance, leak or serious 'near miss'. A review of applicable procedures is included as part of this review. Any deficiencies in the procedures will be addressed.



**Exhibit D**



## **8. Preplanning Emergency Response Activities with Fire, Police and Other Public Officials(195.402(e)(7))**

8.1 As outlined in the SemGroup Public Awareness Program, supplemental activities to enhance liaison with emergency responders and public officials include participating in emergency tabletop and/or deployment exercises, conducting facility tours or open houses and making personal contact with public officials. These activities are encouraged as a means to preplan emergency response activities with fire, police and other public officials. SemGroup routinely participates in various training programs for emergency responders and public officials on responding to pipeline emergencies. These programs are conducted via third party providers (Kansas Pipeline Association, Oklahoma Public Awareness Liaison, Arkansas One-Call, Montana One-Call and the Pipeline Association for Public Awareness). In addition to the above, SemStream has site specific terminal emergency response plans in place. These plans are reviewed with the appropriate emergency responders on an annual basis and emergency drills are conducted annually. Due to the flammability issues with propane and butane, SemStream personnel are expected to secure the terminal, take necessary steps to shut down the pipeline, contact appropriate agencies and contractors to mitigate the accident and coordinate with the emergency responders by forming a unified command with the responding agencies. Consideration should be given to evacuating any populated areas until the release is under control and monitoring indicates no flammable atmosphere exists. The role of the Incident Commander may be assumed by the top ranking official of an Emergency Response Agency should the official choose to exercise the option.

## **9. Keeping Logs**

The following information shall be obtained and logged on a suitable form.

- 9.1 Date and time
- 9.2 Name of person calling
- 9.3 Telephone number
- 9.4 Representing what company?
- 9.5 Location of emergency situation (line, station, legal description if known)



**Exhibit E**



If the answer is “yes” to any of these questions, serious consideration should be given to activating the Crisis Management Team.

## **6. Control of Released Hazardous Material** **(195.402(e)(5)and(8))**

- 6.1 In the event of a pipeline or pump station emergency that would involve the release of a hazardous liquid, the following guidelines will be followed:
- 6.2 Shut the affected pipeline system down either by the SCADA System (see Subpart F, Section 1 Chapter 3) or manually (see Subpart F, Section 1 Chapter 4).
- 6.3 Close the nearest accessible block valves both upstream and downstream from the scene of emergency and take all possible precautions to protect the general public and private property in the area of the emergency.
- 6.4 When conditions at the scene of an emergency prevent use of the procedure for orderly control of the released material, intentional ignition may be an alternative. Intentional ignition should only be considered after consultation with public authorities, if they are involved, and all Company personnel available at the scene of the emergency. Intentional flaring of Liquefied Petroleum Gas (LPG) will not be conducted by SemGroup personnel. The fire department with jurisdiction may elect to flare a release of JVL depending on site conditions. The area which will be affected by the fire should be inspected both horizontally and vertically to insure such actions would not create further emergencies. If a fire is already present at the scene of an emergency, do not attempt to extinguish the fire unless conditions and property are present which would be exposed to destruction or a risk to public safety.
- 6.5 Recognizing that LPG rapidly expands to form a flammable cloud, and may stay low to the ground, field response personnel must use their combustible gas indicators (CGIs) to assess the extent and coverage of the plume. Do not rely on sight or odor as there may not be a visible plume nor odor associated with theLPG. Response personnel



will approach from upwind and uphill to minimize the possibility of entering the plume by accident. Based upon the size of the plume, topography, buildings, and weather conditions, work with the local emergency response agencies to effect orderly evacuation of the public. The safety of the Public and the response team comes first. The SemStream Bakken and Rixie pipeline employees have combustible gas indicators which can be used to determine whether or not a hazardous atmosphere exists. These can be used to determine the extent and coverage of a vapor cloud.

## **7. Minimization of public Exposure(195.402(e)(6))**

- 7.1 Call law enforcement officers to help control traffic, establish danger zones to control sightseers and determine if it is advisable to set up roadblocks. Roadblocks may be needed for both automotive and train traffic. If a train passes near or crosses the pipeline, telephone numbers of the railroad dispatcher should be on file so he may be contacted. Evacuation may be necessary. These actions will minimize the exposure to the public to injury and probability of accidental ignition. Operating personnel should assist as needed.
- 7.2 Contact doctors, hospitals and ambulances as necessary.
- 7.3 Consider the necessity of evacuating residents in the area.
- 7.4 Establish contact with Civil Defense, electric companies, gas companies or other service organizations as needed.