

ATTACHMENT 66 – *ENBRIDGE FIELD GUIDANCE DOCUMENT*

Enbridge U.S. Public Awareness Program

FIELD GUIDANCE DOCUMENT

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Enbridge U.S. Public Awareness Program: Field Guidance Document

The safety of the public, our employees and our contractors and the protection of the environment are of the highest importance to Enbridge. A key component of Enbridge's safety and community involvement efforts is an effective Public Awareness Program, which targets those stakeholders who share the company's goal of safe, reliable and environmentally responsible operations. Enbridge is committed to effective communications with the company's key stakeholders through an on-going, relevant Public Awareness Program (PAP).

The PAP has two components: **a baseline program¹**, managed by the Public Affairs department in Houston, and **the supplemental program**, which consists of additional communications at the field level with stakeholder audience groups. **This field guidance document is intended to provide guidance to operations employees tasked with implementing the supplemental portion of the PAP.** Public Affairs is available to provide assistance if needed, and can be contacted at uspublicawareness@enbridge.com.

Objectives of the Enbridge Public Awareness Program

The PAP objectives are:

- To provide information about pipeline operations and safety to stakeholders affected (or potentially affected) by pipeline and related facility operations.
- Help prevent third-party damage to pipelines by educating affected public & excavators about the location of pipelines and the importance of digging safely (e.g., more than a call before excavating).
- Educate affected public, emergency responders and public officials on how to recognize a pipeline incident and how to respond in a way that protects people, property and environment. This will promote a quick and coordinated response to an incident by Enbridge and emergency responders.
- To increase awareness of the emergency response plan (and enhance liaison relationships) with emergency responders.
- Use honest and open communications with key stakeholders to build a reservoir of goodwill in Enbridge host communities through an enhanced understanding of why pipelines are necessary and the company's commitment to maintaining and safely operating these facilities.
- The PAP is a DOT requirement and will be audited by the DOT. DOT will request evidence of supplemental activities during field inspections. Documentation should also demonstrate, for audit purposes, decisions on supplemental activities and pipeline segments.

¹ More information on the baseline program is available through the public awareness plan document. Copies of the plan are available in all area/region offices and will soon be available on eLink; additional printed copies are available upon request. You can also send an e-mail with any questions or comments to uspublicawareness@enbridge.com.

The Supplemental Program: Your Role

At its core, the public awareness regulation (Title 49 CFR 192.616 and 195.440) focuses on one thing: raising awareness among key stakeholder groups about pipelines, their purpose and reliability, pipeline safety, and the measures pipeline operators take to protect the public and the environment. Therefore, it's important that we focus on the messages and the most effective method of connecting with each of the stakeholder audiences, rather than a prescribed approach that is centered mostly on compliance.

As an operations employee, your role in the Public Awareness Program (PAP) is to conduct activities in the field that help inform key stakeholder groups, namely the affected public², excavators, emergency responders and public officials about the company's commitment to maintaining safe, reliable pipeline operations. Part of this information process includes educating key stakeholder groups on how they should react if they perform tasks that may affect the integrity of the pipeline system, or if they witness or become involved with a pipeline incident. Depending on the audience and the situation, you can accomplish this in different ways.

For example, the recommended methods of communication with an individual who lives near the pipeline right-of-way may often differ from how you will typically communicate with emergency responders. The messages we want to emphasize (which are included later in this document) will also differ by audience to a certain extent.

While specific activities are suggested for each audience, these are options that are intended to make the plan as flexible as possible while still meeting the intent of the regulation. Therefore, the decision on which activity (or activities) to conduct lies largely with the managers and supervisors within the Enbridge areas/regions.

² The Affected Public includes, but is not necessarily limited to, residents located adjacent to the pipeline right-of-way, homeowners associations, neighborhood groups, places of congregation (places of worship, schools, parks & recreational areas, prisons, hospitals, playgrounds, day-care facilities, etc.), residents near storage facilities and businesses.

Supplemental Activities:

Several factors should be considered to determine if supplemental activities are necessary along a specific pipeline segment. These include:

Potential hazards.
High Consequence Areas (HCAs).
Population density along right-of-way or near related facilities.
Land development activities.
Agricultural activity.
History of and/or potential for third-party damage.
Logging.
Environmental considerations.
Pipeline leak or spill history in an area.
Specific local situations (e.g., planned tree clearing or maintenance).
Regulatory requirements.
Changes suggested from a public awareness program evaluation.

Forms and Brochures:

The Public Awareness documentation form 11.2 is available in pads of 100 sheets. Please see your supervisor if you have not yet received a pad of these forms. Alternatively, you may email a request to the Public Affairs department at uspublicawareness@enbridge.com. The form will soon be available on eLink.

Each year, the Public Affairs department reviews, revises if necessary, and prints public awareness brochures. Brochures are available for each audience: Affected Public, Excavators, and Emergency Responders/Public Officials. The brochures are also on the Enbridge U.S. Website under Pipeline Safety: (<http://www.enbridgeus.com/Main.aspx?id=2104&tmi=2104&tmt=1>).

Suggested Activities by Audience:

The following table contains a list of suggested activities, reach and key messages for each stakeholder audience:

Audience	Suggested Activity	Reach	Suggested Key Messages
Affected Public	<ul style="list-style-type: none"> • Print materials, or • Personal contact, or • Phone calls, or • Group meetings, or • Open houses, or • Collaborative public awareness programs, or • Enbridge Calendars, or • Mass Media Advertising 	<ul style="list-style-type: none"> • 660 ft on either side of centerline • 1,000 ft on either side of centerline for HCAs 	<ul style="list-style-type: none"> • One-Call requirements • Leak recognition and appropriate actions to take • Safety precautions • Pipeline markers • Encroachment prevention • Planned construction or major maintenance • Emergency contact numbers • Pipeline purpose and reliability • What we do to maintain safe operations
Excavators	<ul style="list-style-type: none"> • Group meetings/liaison meetings, or • One-call center outreach, or • Personal contact, or • Print materials, or • Phone calls, or • Enbridge calendars 	<ul style="list-style-type: none"> • County of operations 	<ul style="list-style-type: none"> • One-Call requirements • Leak recognition and appropriate actions to take • Safety precautions • Encroachment prevention • Emergency contact numbers • Pipeline markers
Area Farmers	<ul style="list-style-type: none"> • Personal contact, or • Phone calls, or • Print materials 	<ul style="list-style-type: none"> • 10 miles on either side of centerline 	<ul style="list-style-type: none"> • One-Call requirements • Hazards of deep plowing and other soil-disturbing activities • Safety precautions • Leak recognition and appropriate actions to take

Audience	Suggested Activity	Reach	Key Messages
Emergency Responders <i>** (See Form 11.2, Public Awareness Documentation Form for specific questions for Emergency Responders. See your supervisors for a copy of the form.)</i>	<ul style="list-style-type: none"> • Personal contact, or • Group meetings/Liaison meetings, or • Phone calls, or • Emergency tabletop, deployment exercise, etc., or • Facility tour, or • Open house 	<ul style="list-style-type: none"> • County of operations 	<ul style="list-style-type: none"> • Emergency response plan • Emergency contact numbers • Product information and potential hazards • Leak recognition and response • Encroachment prevention • Emergency preparedness communications • Information on Integrity Management Plan (gas) or HCA Management Plan (liquids) • <i>Ask about response capabilities</i>
Local Public Officials	<ul style="list-style-type: none"> • Personal contact, or • Print materials, or • Group meetings/liaison meetings, or • Facility tour, or • Open house, or • Videos and CDs 	<ul style="list-style-type: none"> • County of operations 	<ul style="list-style-type: none"> • Emergency response plan • Information about HCA designation or other factors unique to pipeline segment • Information on Integrity Management Plan (gas) or HCA Management Plan (liquids) • Encroachment prevention • Planned construction or major maintenance
Local Public Safety Officials (Emergency Management Coordinator, Local Emergency Planning Commission, Mayor, Fire Chief, Police Chief, etc.)	<ul style="list-style-type: none"> • Personal Contact, or • Phone calls, or • Print materials 	<ul style="list-style-type: none"> • HCAs 	<ul style="list-style-type: none"> • Information about HCA designation or other factors unique to pipeline segment • Information on Integrity Management Plan (gas) or HCA Management Plan (liquids) • Emergency Preparedness Communications • Emergency response plan • Encroachment prevention

Audience	Suggested Activity	Reach	Key Messages
Schools	<ul style="list-style-type: none"> • Personal contact, or • Print materials, or • Phone calls 	<ul style="list-style-type: none"> • Schools within 1,000 ft on either side of centerline • Offer opportunity for visit through School District or in Texas, through regulatory agency 	<ul style="list-style-type: none"> • Safety precautions • Encroachment prevention • Planned construction or major maintenance • Leak recognition and response • One call requirements • Pipeline markers
One-Call Centers	<ul style="list-style-type: none"> • Print materials, or • Personal contact, or • Phone calls 	<ul style="list-style-type: none"> • One-call centers serving area and meetings of excavators in county of operations 	<ul style="list-style-type: none"> • Accurate line location information • System performance • System improvements

General messages for all audiences

Following are general messages for use in discussions about Enbridge and pipeline safety with the affected public, excavators, emergency responders, local public officials and other interested parties.³

Integrity Management/HCA Management Plan:

- Enbridge supplements its comprehensive maintenance procedures with an Integrity Management Plan (gas) / HCA Management Plan (liquids), which describes how some parts of our pipeline system have a greater potential for affecting public areas or environmentally-sensitive areas in the unlikely event of a leak.
- An overview of this plan is available on our website:
<http://www.enbridgepartners.com/PipelineIntegrity/PipelineIntegrity.asp>

Right-of-way encroachment prevention:

- The right-of-way enables Enbridge employees and contractors to gain access to the pipeline in the event of an emergency and for routine inspections, maintenance or testing.
- This is a public safety issue. Enbridge understands the emotional attachment that landowners have to their land. However, we must maintain our rights-of-way in order to have immediate access to the pipeline for maintenance, testing or in a pipeline emergency.
- There is an expectation on the part of our federal government that pipeline companies maintain ROW in such a way that we can maintain the integrity of the pipelines located within those easements.

Pipeline purpose and reliability:

- According to government studies, pipelines are the safest, most efficient and most reliable method of transporting energy products.
- Enbridge pipelines are part of the energy infrastructure in North America, and transport natural gas and petroleum.

Prevention measures undertaken by Enbridge:

- Enbridge is committed to protecting the public and the environment. We build safety into every step of pipeline construction and operations.
- Enbridge takes many preventive measures to promote safe, reliable operations of our pipelines and related facilities. An overview of these measures is available on our website:
<http://www.enbridgepartners.com/PipelineIntegrity/PipelineIntegrity.asp>

³ *Additional information on these topics is available in the Public Awareness brochures. The brochures are divided by audience: Affected Public, Excavators and Emergency Officials/Public Officials. Please refer to the appropriate brochure as you need to provide more detail.*

One-call requirements:

- Accidental strikes caused while digging in the right-of-way account for a major source of pipeline damage and leaks.
- Such damage may not immediately result in a pipeline break but can weaken metal or remove the corrosion-preventing coating, which could lead to a pipeline leak months or even years later.
- Most states have laws requiring that everyone notify the local One-Call Center of any proposed digging or soil-disturbing activity – such as planting shrubs or trees – at least two (three days in some states) working days before beginning any excavation.
- One-Call notification can now be completed locally in most areas simply by dialing 8-1-1. This should connect to the nearest One-Call Center. Information is also available at www.call811.com.

Pipeline markers:

- Pipeline markers indicate the general location of buried pipelines and should never be used as a reference for the exact location of a pipeline.
- Information on the general location of pipelines is also available through the National Pipeline Mapping System, at www.npms.phmsa.dot.gov. However, do not rely on this information when planning to dig near any pipeline. The One-Call procedure must be used to properly locate pipelines prior to any soil-disturbing activity.

Leak recognition and appropriate actions to take:

- Enbridge takes its responsibility for pipeline safety seriously and we have an emergency response plan in place to work promptly and effectively with local emergency responders to protect the safety of the public and the environment.
- Given our thorough maintenance, testing, training, monitoring and safety programs, a pipeline leak is unlikely.
- Never attempt to operate pipeline valves or extinguish any pipeline fires. This could actually prolong or worsen an incident or even cause another leak in the pipeline.

Examples

For the purposes of complying with the supplemental program requirements in the new public awareness regulation, the following are examples of how you might treat different scenarios involving routine field activities. Obviously, this list is not comprehensive. Please call Public Affairs in Houston with any questions.

- A) You come across someone digging, grading, deep plowing, or conducting other soil-disturbing activity near or on a pipeline right-of-way.
 - 1) Find out if a line locate was requested and then completed.
 - 2) If no line locate was requested, approach the individual/contractor to discuss pipeline safety.
 - 3) Provide excavator brochure and discuss the importance of calling One Call before digging, grading, deep plowing, etc.
 - 4) Provide information on depth of pipe in area, easement information, etc.
 - 5) Add individual/excavator to invitation list for excavator meetings.
 - 6) Document conversation on public awareness documentation form 11.2.

- B) You respond to a request for a line locate.
 - 1) Perform normal line locate duties.
 - 2) Thank the excavator/resident for calling One Call
 - 3) Provide copy of excavator brochure and discuss pipeline safety.
 - 4) Document conversation on public awareness documentation form 11.2.

- C) You notice that a lot of development is occurring near the pipeline right-of-way.
 - 1) Notify supervisor of possible change in class/inclusion in HCA Management Plan.
 - 2) Provide excavator brochure to developer and contractor.
 - 3) Add individual/excavator to invitation list for excavator meetings.
 - 4) Document conversations on public awareness documentation form 11.2.

- D) You schedule an emergency drill/boom deployment exercise.
 - 1) Invite local emergency responders to participate.
 - 2) Notify emergency management coordinator and offer opportunity to participate or observe.
 - 3) Discuss emergency response plan
 - 4) Ask for information regarding response capabilities.
 - 5) Document exercise and conversations on public awareness documentation form 11.2.

- E) You have scheduled a major maintenance activity or construction.
 - 1) Notify local public officials – particularly if there will be any road closures.
 - i) Discuss purpose behind maintenance/construction.
 - ii) If maintenance, discuss Integrity Management Plan/HCA Management Plan and the measures undertaken by Enbridge to maintain safe, reliable pipeline operations.
 - 2) Notify residents along that segment of pipe about planned activities.
 - i) Discuss purpose behind maintenance/construction.

- ii) If maintenance, discuss Integrity Management Plan/HCA Management Plan and the measures undertaken by Enbridge to maintain safe, reliable pipeline operations.
 - 3) Notify local emergency responders.
 - i) Discuss purpose behind maintenance/construction.
 - ii) If maintenance, discuss Integrity Management Plan/HCA Management Plan and the measures undertaken by Enbridge to maintain safe, reliable pipeline operations.
 - 4) Document all discussions/conversations on public awareness documentation form 11.2.

- F) You become aware of a logging or other contractor hauling heavy loads across or parallel to the pipeline.
 - 1) Notify the contractor of hazards and potential dangers.
 - 2) Provide excavator brochure and open discussion on pipeline safety.
 - 3) Determine who hired the contractor (landowner, land developer, etc.) and provide that person with excavator brochure.
 - 4) Add contractor and employer to the excavator meetings invitation list.
 - 5) Document all discussions/conversations on public awareness documentation form 11.2.