

From: [Erin Kurilla](#)
To: [Sara Lyons](#)
Subject: RE: PSMS Information for APGA Members - NTSB Safety Recommendation
Date: Wednesday, December 13, 2023 9:45:30 AM
Attachments: [APGA Commitment to Pipeline Safety.pdf](#)

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Sara –

Thank you so much for reaching out. The APGA Board did pass a Board Resolution in July 2018 titled the APGA Commitment to Pipeline Safety. It contains 10 action items that are aligned with the 10 elements of API RP 1173. You'll notice, however, that we don't specifically reference API RP 1173. This is deliberate & I'd love an opportunity to chat with you about that...

Do you have any availability tomorrow or Friday morning? I'm also available Monday & Tuesday next week, if that works better.

Thank you,

Erin Kurilla

Vice President, Operations and Pipeline Safety

[American Public Gas Association](#)

From: Sara Lyons <[REDACTED]>
Sent: Tuesday, December 12, 2023 4:50 PM
To: Erin Kurilla <[REDACTED]>
Subject: PSMS Information for APGA Members - NTSB Safety Recommendation

Hi Erin,

I'm not sure if you were able to watch our Board Meeting on the San Pedro Bay pipeline accident last week. Our Board voted on a recommendation to all PHMSA-regulated pipeline owners and operators to develop and implement a PSMS based on API RP 1173. This was a recommendation that was proposed by Chair Homendy during the meeting and I'm now doing some research to help develop the supporting text.

I know that AGA's Board voted for all AGA members to implement a PSMS program, and I'm not sure if APGA members have made a similar commitment. Whether APGA made such a commitment or not, I'm sure that many of your member companies have voluntarily implemented PSMS. I'm trying to determine if there's a list of APGA members that already have such a program (by PHMSA OPID and parent company if possible).

I will try to narrow down the list of safety recommendation recipients to only those companies that



American Public
Gas Association

Commitment to Pipeline Safety

A safety management system is a systematic approach to managing safety. Embedded in a SMS are the overarching structures, policies and procedures an organization uses to direct and control its activities. In many situations, pipeline operators already have these elements implemented and Pipeline Safety Management Systems (PSMS) offers a framework to continuously improve these programs.

One of the elements of a safety management system that is essential to safe operations is a commitment by management.

Whereas: Safety is the highest priority of APGA members; and

Whereas: public gas systems have an excellent safety record; and

Whereas: the basic elements of pipeline safety management systems are applicable to systems of all sizes and can assist operators in identifying areas where pipeline safety performance can be enhanced; and

NOW, THEREFORE, BE IT RESOLVED: that APGA members are committed to continuing to enhance pipeline safety through the following Safety Management System elements:

1. Promoting a positive safety culture within our system.
2. Communicating and educating our employees, contractors, and the public regarding pipeline safety.
3. Implementing processes and actions that reduce risk and maintain the integrity of our pipeline assets.
4. Developing and maintaining safe work practices.
5. Investigating incidents and near-misses on our pipeline system in an effort to identify and implement corrective actions moving forward.
6. Verifying that existing operations and safety practices are improving pipeline safety.
7. Reviewing our system's safety performance to determine if additional actions are necessary to improve pipeline safety.
8. Responding effectively to pipeline incidents.
9. Ensuring that our personnel and our contractors are competent in performing all tasks that impact the integrity of our system.
10. Maintaining documentation needed to ensure pipeline safety.

Sara Lyons

From: Sames, Christina <[REDACTED]>
Sent: Wednesday, March 31, 2021 3:51 PM
To: Hall Robert; Lyons Sara
Cc: Patni, Sonal; Lynum Sean
Subject: RE: Circling back: AGA PSMS Workshop Panel presentation

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Thank you Robert and Sara!!

Sara, we greatly appreciate your willingness to participate. As you will see in the original message, we are hoping you can spend 10 minutes covering the NTSB's expectations of the industry and where the NTSB would like to see the industry head next in regards to PSMS. We don't need you to highlight why companies should implement PSMS since, in 2019, AGA's Board approved a commitment for companies to fully implement PSMS within 3 years (implement, conduct a gap analysis and begin to take actions to address the gaps) and we have a number of activities related to PSMS.

You are welcome to participate in all three days of the event and the audience participants will have a wide range of PSMS maturity. I have included Sonal Patni, AGA's lead on the workshop, on this message. She can provide you with additional information and can answer any questions you may have. Thank you again!!

Christina

Christina Sames | Senior Vice President for Safety, Operations and Security
[American Gas Association](#)

400 N. Capitol St., NW | Washington, DC | 20001

P: 2 [REDACTED] | [REDACTED]

The American Gas Association represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 72 million customers throughout the nation.

From: Hall Robert <[REDACTED]>
Sent: Wednesday, March 31, 2021 9:46 AM
To: Sames, Christina <[REDACTED]>
Cc: Lynum Sean <[REDACTED]>; Lyons Sara <[REDACTED]>
Subject: Re: Circling back: AGA PSMS Workshop Panel presentation

Sara Lyons will support for NTSB. We would like her to attend all three days.

From: Sames, Christina <[REDACTED]>
Sent: Wednesday, March 31, 2021 8:37 AM
To: Hall Robert <[REDACTED]>
Subject: Circling back: AGA PSMS Workshop Panel presentation

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Good morning Robert!

First, thank you for allowing Rachel to participate in the residential methane workshop in early May! It should be a good workshop.

Sara Lyons

From: David W. Murk <[REDACTED]>
Sent: Wednesday, December 6, 2023 4:58 PM
To: Sara Lyons
Cc: Sam Minifie; Alexa S. Burr
Subject: RE: PSMS Information for API Members - NTSB Safety Recommendation

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Hey Sara, so circling back after discussing with our Pipeline SMS lead Sam Minifie who I have cc'd on the email.

So, as far as API member companies and are tracking specific to SMS and RP 1173 being in place, we stopped tracking at the company-level around 2019. However, [API's Energy Excellence](#) program includes the 10 SMS Program Elements and requires all members to commit to these principles as an expectation of API membership. As you know INGAA and AGA have similar Board-level commitments. For more information specific to our API Energy Excellence program I am including Alexa Burr who oversees that program and can provide more details.

Also, for reference I am sharing a link to our Pipeline SMS 2022 Annual Report ([here](#)), and 2021 report ([here](#)) both which talk about the overall mileage covered in PSMS. We also recent conducted a safety culture survey with INGAA and LEPA and over 25 member companies and can provide more details on that survey as well.

Sam, anything else to add?

Hope this helps provide some context, happy to provide any more context.

Best,
Dave

From: Sara Lyons <[REDACTED]>
Sent: Tuesday, December 5, 2023 5:47 PM
To: David W. Murk <[REDACTED]>
Subject: Re: PSMS Information for API Members - NTSB Safety Recommendation

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That would be great - thanks Dave. As far as timing I may only have until the end of next week to put forward a draft. So, if something does not already exist, we may not have time to develop it.

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From: David W. Murk <[REDACTED]>
Sent: Tuesday, December 5, 2023 5:03:05 PM
To: Sara Lyons <[REDACTED]>
Subject: Re: PSMS Information for API Members - NTSB Safety Recommendation