Reference: 49 CFR, Part 192, Subpart P (2010)

OSHA Link:

Chapter 6: Identify and Implement Measures to Address Risk



- Excess Flow and Curb Valve Installation
- Alcohol Misuse and Drug Abuse Policy
- Continuing Surveillance Program
- Pipeline Patrolling Program
- Welding Program
- Plastic Pipe Joining Program/Electro-fusion QA/QC
- Corrosion Control Program
- Cross Bore Monitoring & Remediation
- Training Programs
- Odorization Program
- · Facility Replacement Program
- Low Pressure Systems Management Program
- Farm Tap Inspections
- Material Quality Program
- Cyber Security Risk Management Program

Additional information about these programs and policies can be found below and in Appendix D.

II. Leak Management Program

Atmos Energy's Leak Management Program complies with the minimum requirements of 49 CFR Part 192, §192.703, and §192.723. The program is described in Atmos Energy's Operations & Maintenance Procedures, Section 9, and Gas Leak Surveys. Key elements of Atmos Energy's Leak Management Program along with the document reference can be found in Appendix D.

Threats / Risks Mitigated

As a result of the surveying of distribution systems and the subsequent locating, grading, and repair and/or monitoring of leaks found within those systems, Atmos Energy's Leak Management Program contributes directly to the mitigation of the following threats or risks:



DIM Plan

Reference: 49 CFR, Part 192, Subpart P (2010)

OSHA Link:

Chapter 6: Identify and Implement Measures to Address Risk



- Corrosion
- Excavation Damage
- Natural Force Damage
- Other Outside Force Damage
- Materials
- Joints/Welds
- Incorrect Operations
- Equipment Failure
- Other

Leak Management Program Enhancements (Leak Survey and Leak Repair Schedules)

In addition to the minimum requirements pertaining to leak management prescribed in 49 CFR Part 192, certain states have promulgated rules regarding leak repair schedules and leak survey schedules that exceed the minimum requirements of 49 CFR Part 192. Related, Atmos Energy has adopted a system-wide practice of remediating pipe segments subject to grade 3 leaks via pipeline repairs completed within 36 months of identification and grading and remediating grade 2 leaks via pipeline repairs completed within 12 months of identification and grading in certain states of operation. Details of such enhancements are incorporated in applicable sections of Atmos Energy's Operations & Maintenance Procedures, Section 9, Gas Leak Surveys.

III. Damage Prevention Program

Atmos Energy's Damage Prevention Program complies with the minimum requirements of 49 CFR Part 192, §192.614 and is described in Atmos Energy's Operations & Maintenance Procedures, Section 3, Damage Prevention Program. Key elements of Atmos Energy's Damage Prevention Program along with the document can be found in <u>Appendix D</u>.

