3. Core Information and Requirements

An undesired event is an event that results in any one of the following:

- Harm to people, fatalities involving Company employees and contractors, lost work days and/or modified duty days associated with injuries and illnesses, Occupational Safety and Health Administration (OSHA)-recordable incidents and first aid cases
- Damage to Company and/or third party (including customer's) facilities, equipment, property, vehicles (facilities can include pipelines and associated equipment)
- Environmental impacts, all unplanned or unscheduled releases of a chemical substance, gas, or loss of product into the workplace or environment (Refer to **O&M Procedure 1030 – Unmeasured Gas Use/Loss Reporting** and **O&M Procedure 1201 – Environmental Release Response**)
- Operational process interruption
- Partial or full customer interruption
- A serious or potentially high loss near miss that could have resulted in any of the above conditions if it had occurred under slightly different circumstances (as determined by the Environmental, Health and Safety [EHS] representative or the affected area's senior Company official). Refer to **O&M Procedure 166 – Safety Hazard/Near Miss Reporting** and/or
- A pipeline Safety-Related Condition meeting the requirements of **O&M Procedure 214 – Reporting Pipeline Safety-Related Conditions, Reporting Safety Related Conditions Subsection**

The Company requires internal reporting and investigating of any undesired event. Various agencies require reporting, including U.S. Department of Transportation (DOT), OSHA, Environmental Protection Agency (EPA) and implementing state or local agencies. The Company uses an incident-tracking database (**IMPACT**) and various forms for reporting, tracking, investigating and documenting undesired events. The **Emergency Response Line** (**ERL**) system is designed to facilitate real-time notification of Level I and Level II undesired events that affected or potentially affected Company stakeholders.

Personnel requesting additional ERL lists must submit an email request including manager approval to the ERL List Administrator identified on the **ERL List** (http://██████

Refer to Attachment 1 – ERL Communication Protocol for a timeline of actions taken and persons responsible for each phase of the event.

If an ERL call is necessary, it will be held on the dedicated emergency response conference line: ████████████ The extensions for each entity are listed in **Attachment 3 – Initial Control Room Notification Checklist / ERL Conference Lines**.

3.1. Initial Release Discovery Response and Regulatory Reporting

Determine regulatory reporting in a timely manner is important. On the initial ERL call, Operations and/or Control Center personnel will provide known release discovery information to EHS and/or Codes and Standards personnel who will be responsible for assisting Operations management with determining applicable regulatory reporting and making the notifications.

1) Immediately upon identification of undesired event:

   A) Determine whether there is a hazard to persons or property.
   B) Use extreme caution if in the immediate vicinity of a hazard. Before approaching a hazardous situation, review and follow the instructions in the Safe Approach Checklist

(see Attachment 6 – Safe Approach Checklist for more information).

C) Take whatever steps are necessary to make the immediate situation safe.
D) Determine whether any water bodies have been impacted. If water bodies have been impacted, initiate an **ERL** call immediately.
E) Follow applicable Company procedures. Refer to **O&M Procedure 1900 – Emergency Response** and the site-specific Emergency Response Manual for site-specific response actions.

2) Company personnel identifying the event will:

A) Notify their Supervisor. If the Supervisor cannot be reached immediately, contact Gas Control.
B) Determine event classification using Attachment 2 – Event Classification Chart.
C) Immediately contact Gas Control for any ERL/ERL+ events. Refer to Attachment 3 – Initial Gas Control Notification Checklist for baseline information requirements. During this call, a decision should be made regarding who will initiate the ERL process (whether it will be Gas Control or other appropriate company personnel). Gas Control will initiate all ERL+ Notifications
D) Operations Management or the EHS representative will notify Gas Control of any event that they consider significant even if it does not meet any of the criteria listed in Determining ERL Notification Levels Subsection.

3) Gas Control or other appropriate company personnel will initiate the **ERL** process, which will notify designated Company personnel to join the ERL conference call. For the purposes of ERL initiation, appropriate company personnel are those employees who have been trained in ERL system data entry and are familiar with the details of the event. Refer to Determining ERL Notification Levels Subsection for more information.

4) Field Operations Management will convene and facilitate the ERL conference call during which participants will determine immediate actions and necessary follow-up activities and notifications. The on-site Company representative or designee will be asked to give details about the event. When the event includes unintentional gas loss, the **ERL Workbook** spreadsheet can be used to calculate estimated gas loss. Refer to Attachment 4 – Initial ERL Call Checklist.

5) Appropriate Company personnel will issue an update ERL message to schedule additional conference calls or conclude the event.

6) Company personnel will investigate the event in conformance with Investigation Subsection.

Refer to Attachment 1 – ERL Communication Protocol for a timeline of actions taken and persons responsible for each phase of the event.

Refer to Attachment 3 – Initial Gas Control Notification Checklist for Emergency Response Contact Telephone Numbers.

3.2. Determining ERL Notification Levels

The Corporate Crisis Response Plan categorizes events according to their severity. Level 0 (local) events do not require Gas Control involvement or ERL activation. Level I and Level II events require **ERL** or **ERL**+ (ERL Plus) activation respectively.

Gas Control or other appropriate company personnel will issue an **ERL** or **ERL**+ (Gas Control will initiate all ERL+ calls) notification for any Level I or II event associated with a Company operation, including events incurred by third party contractors working for the Company. An 'Information-Only' ERL does not require a conference call.

After the initiation of an ERL, if the conditions change, an updated ERL should be sent with the latest information. If the change in conditions include any ERL+ criteria, the ERL shall be upgraded to an ERL+ and an ERL+ notification shall be issued at that time.

Refer to Attachment 2 – Event Classification Chart for a list of ERL notification levels.

Attachment 1 – ERL Communication Protocol

STEP	TIME	RESPONSIBILITY	ITEM
1		3rd Party, or Company Field Employee	Incident or Undesired Event (Level I, II, or Level undetermined) • 3rd party contacts Gas Control Center, or • Company employee contacts Supervisor, if the Supervisor cannot be reached immediately, contact Gas Control. • Company Supervisor or designee immediately contacts the Gas Control Center for notification of an undesired ERL/ERL+ event. • Refer to Attachment 3 – Initial Gas Control Notification Checklist for baseline information requirements.
2	At time of event notification	Gas Control Center	• Complete Gas Control Center Incident Information Sheet/Log • Ask if there are any agencies on the scene (State or Federal) • Repeat back information to ensure accuracy
3	As soon as possible after notification	Gas Control Center	• If contacted by 3rd party, confirm event with field or facility personnel. • Confirm contact information for Company event 1st responder.
4	As soon as possible after notification	Gas Control Center in consultation with Company Field Employee	Determine event reporting level using Attachment 2 – Event Classification Chart. • Level I – ERL (Info Only or Call) • Level II – ERL+ (Call)
5	As soon as possible after notification	Gas Control Center or appropriate Company personnel	Send ERL or ERL+ notification as determined by ERL/ERL+ criteria using the **ERL intranet notification** tool. Schedule initial conference call as soon as possible, except for Info Only events. ERL+ calls will be scheduled no later than 10 minutes following initial notification of event. Incidents involving release or threatened release to water/water bodies or environmental releases exceeding a reportable quantity require immediate ERL notification.
6	At time specified in ERL notification message	Gas Control Center, Corporate On-Call, ERL or ERL+ personnel as designated	1st Conference Call: Except for Info Only events, an initial conference call will be conducted. Affected personnel call into the dedicated emergency response conference lines (identified in Section 3 above). If multiple ERL calls occur at the same time, each call will be taken in order of event level or, when necessary, additional conference lines will be assigned. Contact the Network Operations Center (NOC) ▮▮▮▮▮ for additional lines. Conference call related problems shall be reported to the NOC. The initial conference call will include at a minimum: • Gas Control Center, if event/incident impacts transportation or commercial operations (pipeline facility events) • Field or facility Operations (person with knowledge of events) • On-Call EHS and Codes & Standards • Operations Management (Supervisor or Manager) • EHS field representative • Representative for other groups, as appropriate (Engineering, Risk Engineering, Executive and/or senior management, Insurance, IT, Public Relations, Legal, Business Development) A checklist of recommended ERL+ attendees is available in the ERL workbook. Field Operations will facilitate the meeting. The content of 1st conference call may or may not include: • Identify asset(s) and affected business unit(s); • Summarize known event details (refer to Attachment 4 – Initial ERL Call Checklist); • Determine: - Employee and public safety - Release to environment - Property damage (Company and/or third party collateral damage) - Agency report ability, required reporting timeframe, and resources required - Making site safe - Commercial interruptions and system impact - Emergency Responders on site or required

STEP	TIME	RESPONSIBILITY	ITEM
			- Any media on site - Plans for restoring operations • If immediate agency reporting is required, the appropriate Corporate On-Call designee will drop off of the call to complete reporting (refer to Step 7). • If Emergency Responder notification is required, then the local field operations representative will notify emergency officials by calling 911. • If initial notification was an ERL, determine if ERL+ notification is necessary. • Determine if **Crisis Support Plan (CSP)** should be implemented. If the CSP is implemented, follow Plan guidelines, as described in CSP Section 4.0. Otherwise: - Establish Incident Command System including an Incident Commander, if warranted - Determine time, meeting leader & participants for next conference call Persons who actively participate shall have the responsibility of communicating information to others in their respective groups as warranted.
7	As soon as possible	Corporate On-Call: • EHS • Codes and Standards • EHS / Codes and Standards Company representative	Notify appropriate regulatory agencies as soon as possible: Environmental/Safety related Notifications: • EPA (via NRC) and OSHA • CSB for non-PHMSA Reportable Incidents • Applicable state and local agencies Pipeline Safety related Notifications: • DOT (via NRC) related • CSB for PHMSA Reportable Incidents • APSC • LA DNR • OCC • TRRC • UT Division of Public Utilities Document agency notifications: • Agency Notified • Agency Contact • Notification Time • Report Details, including the Report Number

Attachment 2 – Event Classification Chart

Event Classification Levels and listed ERL Notification Levels are minimum requirements and may be upgraded at the discretion of the initiating party based on event circumstances.

Review **all** event classifications and select the highest applicable ERL notification level.

Schedule all ERL calls as soon as possible following event notification. ERL+ calls will be scheduled no later than 10 minutes following initial notification of event.

Classification	Level 0 NO ERL[3]	Level I – ERL	Level II – ERL+
Any fatality or serious injury to a member of the public			CALL
Any suspected or confirmed pipeline hit on an in-service or inactive pipeline, or an abandoned pipeline with product released to the environment, and involving or caused by Company facilities, personnel, or equipment		CALL	
Where the estimated property damage to Company equipment, vehicles or facilities; or Company's portion of the repairs, cost (including cost of gas released), spill remediation and/or emergency response is likely to be greater than or equal to $500,000			CALL
Major fire, rupture or explosion that involves Company, public or private property			CALL

Attachment 4 – Initial ERL Call Checklist

ERL Call in Number:

_____ , or _____ as specified in the ERL/ERL+ electronic notification. _____ is used for a rollover in the event the primary number is already in use.

Note – A full role call is not required. Start the call by stating you will only request confirmation that you have key participants, those that have agency reporting responsibilities and those with knowledge of the event on the call. Discourage others from announcing themselves.

The following information will be discussed on the ERL call; however, the ERL call SHOULD NOT BE DELAYED to collect the information. As you discuss the event and complete this checklist, please keep in mind how you will need to respond to the event, as well as, the makeup of your response organization. Early in the call you should also make decisions on whether or not the event requires you to mobilize an ICS structure and determine if Command Post will be utilized.

- **Description of the Event**
- **Discovery Date and Time**
- **Location** (enough information to identify the site)
  - State
  - County
  - Address or nearest town
  - Company Description (Station, Index)
  - Nearest Crossroads
  - Latitude & Longitude
  - Facility Type (Underground Natural Gas Storage, Transmission or Gathering Pipeline)
  - Class Location
  - Located in HCA
  - Weather Conditions
- **Natural Gas Released**
  - Gas Lost (MCF)
    - Release ≥ 3,000 mcf (PHMSA-Reportable Incident)
    - Release and ≥ $122,000 (PHMSA-Reportable Incident)
    - Release + Property Damage ≥ $5,000 (some State incident reporting requirements)
    - Environmental Reporting (State or Federal)
  - Operating Pressure (psig)
  - Leak/Relief Diameter (inches)
  - Venting Time
  - For Blowdowns: pipe length, pipe diameter
- **Release/Spill (Other than Natural Gas)**
  - Product Released/Spilled (*CAS # Required if CSB Reportable*)
  - Volume Released (gal/bbs)
  - Sheen on any water body
    - Water body name
  - Actions taken to stop/clean release
- **Bodily Injury/Illness**
  - Number of Injured
  - Nature of Injuries
  - Name(s) of Injured
  - Job Title(s) of Injured
  - Death/Inpatient Hospitalization Required
  - Family Notified
- **Property Damage/Repairs**, estimated costs, not including gas released
- **Service Interrupted/Customer Impact**
- **Waiver/Special Permit Requirements**

- **3rd Party Line Strike (Validate One Call Number and Public Awareness Contacts)**
- **Roads Closed**
- **Public Evacuation**
- **Media Involvement**
- **Local/State/Federal Involvement**
- **If during the call a decision is made to escalate to an ERL+, have everyone remain on the call and simply issue the ERL+ notification using the same call-in number and code. Continue with coordination of response and reporting activities while the expanded group joins the call.**
- **Control Center Actions or Fatigue**
- **Abnormal Operation Event per O&M Procedure 1902 (e.g., unintended valve closure, loss of communication, operation of a safety device)**
- **Drug/Alcohol Testing Required**
- **OQ Verification Required**
- **Determine if an MOC is required**
- **Local Company Contact**, when event is reportable to a regulatory agency
- **Determine necessity, level, and assignment of follow-up investigation**
- **Determine need to staff for ICS response**
- **Determine whether the Command Post system will be used**