From: Jeff Ortloff
To: Kim West
Cc: Sara Lyons
Subject: RE: [EXTERNAL]RE: Huntington Beach, CA (DCA22FM001) - Request for information 2 - updated training
Date: Monday, October 16, 2023 7:29:00 AM
Attachments: image001.png

Good morning Kim,

Please see below for additional information on these topics. We will provide courtesy copies of the materials referenced below into Kiteworks. We hope this information is helpful, and we are happy to discuss it. We have organized these responses according to the six topics that you identified.

1. *Provide Atmos LDS 2001 Operation Manual*

We previously provided this document on March 18, 2022 at NTSB_PHMSA_00004285. We will provide a courtesy copy, along with the other documents noted below.

2. *Description of the leak alarm tags that are indicated in the Alarms_OCT 1-3 Excel spreadsheet containing the various alarms. In particular, please indicate the description of the following leak alarm codes: 14_ALM_Atmos_Leak_Detected and 10_ALM_Leak_Detect_From_Atmos*

The relevant leak detection tag from the ATMOS system is 14_ALM_Atmos_Leak_Detected, which indicates a potential leak has been detected on the Pipeline. 10_ALM_Leak_Detect_From_Atmos reports that a leak detection alarm has alarmed for the Pipeline.

3. *List of OQ covered tasks Amplify required its controllers, PIC, and other[s] involved in leak response decision-making to hold.*

As part of its May 12, 2023 Response to PHMSA's Notice of Probable Violations, we provided a list of OQ modules that all Beta employees, including controllers, PICs, and others, have taken between January 1, 2008 to October 11, 2022. Please see Ex. 9, CSInc024124. These trainings constitute all OQ-covered tasks that Beta required of its controllers, PIC, and others involved in leak response decision-making (with the exception of CPM Leak Detection, which we discuss below). Beta also specifically requires its controllers to complete certain OQ modules. Please see NTSB_PHMSA_00005326. Controllers must complete the following OQ modules:

- AOC - Abnormal Operating Conditions
- OQ29 - Pig Launcher and Receiver
- OQ43A - Field Operations of a Pipeline, Including Startup and Shutdowns
- OQ43B - Control Center Operations of a Pipeline, Including Startup/Shutdown
- OQ45 - Pig Launcher Pressure Relieving Equipment
- OM01 - Safety Related Conditions

- OM02 - Incident Reporting
- CRM01 - Control Room Management
- CRM02 - Fatigue

4. *Training and examination materials for the following covered tasks, as of the date of the accident. If abnormal operating conditions are covered generically, include the associated training and examination materials, as of the date of the accident.*
    a. *Control Center Operations of a Pipeline, Including Startup/shutdown*
    b. *CPM Leak Detection*

Beta's OQ trainings were administered by Compliance Services, Inc., a third party. As we did with PHMSA, we are happy to provide NTSB a demo account to access the training platform and see all of the materials. Beta also produced the "Test Requirements and Instructions" sheet given to trainees, which contain further information on how to log-in and access the modules. Please see NTSB_PHMSA_00005326. Once an employee completes a training module, the employee completes a "Job Performance Evaluation" test. On March 18, 2022, Beta produced Job Performance Evaluations for its control room operators. Please see NTSB_PHMSA_00004811 to NTSB_PHMSA_00004893.

With respect to Control Center Operations of a Pipeline, including Startup/shutdown, the training materials concerning this covered task are accessible through Compliance Services (for which we can provide demo account access). Beta also provided the specific training materials concerning this OQ module as exhibit 16 to Beta's May 12, 2023 Response to PHMSA's Notice of Probable Violations (CSInc017009), and the examination materials for this OQ module were provided on March 18, 2022 (*see, e.g.*, NTSB_PHMSA_00004812).

With respect to CPM Leak Detection, Beta employees do not specifically train on this module including because the CPM leak detection training is not relevant to Beta employees who operate the leak detection system in the control room. CPM stands for "computational pipeline monitoring," which is a training program for maintaining the underlying software that powers the leak detection system. Beta's former leak detection vendor, Atmos, was responsible for maintenance of the leak detection software, and Beta maintained contracts with Atmos to that effect.

With respect to abnormal operating conditions, AOCs are covered generally (in that there is a general OQ module concerning AOCs), as well as specifically (in that more specific trainings, such as Control Center Operations of a Pipeline, Including Startup/shutdown, include references to AOCs specific to starting up and shutting down the Pipeline). Beta provided the general training materials concerning AOCs as Exhibit 14 to Beta's May 12, 2023 Response to PHMSA's Notice of Probable Violations (CSINC017017). As noted above, examination materials for OQ modules that include references to AOCs specific to these OQ modules were provided on March 18, 2022. *See, e.g.*, NTSB_PHMSA_00004812.

5. *Describe the most recent (pre-accident) control room team training and exercised that included both controllers and other individuals who would reasonable be expected to operationally collaborate with controllers during normal, abnormal or emergency situations.*

Please provide the dates and the make up of the team members at each session.

Beta controllers participate in several training exercises in which controllers and other individuals "who would reasonably be expected to operationally collaborate with controllers during normal, abnormal or emergency situations." For example, Beta controllers participate in Beta's monthly "Emergency Drills" (one for each crew, "Red" and "Blue," during its respective 14-day hitch). These drills each cover a specific emergency scenario, including (1) fire and explosion; (2) man down, man overboard, and platform evacuation; (3) terrorism; (4) severe weather; (5) uncontrolled well blowout; (6) hydrogen sulfide and other chemical release; (7) earthquakes; and (8) other scenarios as may be applicable in offshore production operations. These drills are team training exercises in which controllers work on responding to abnormal and emergency situations. The most recent, pre-accident training exercises were:

- Beta's "Red Crew" conducted an H2S/Fire/Earthquake Drill on September 12, 2021. There were the designated Drill Coordinators. The drill involved an earthquake that triggered an H2S leak and a fire on Platform Elly. We will provide a document that shows the Beta employees who attended the drill (and we trust that consistent with our prior practice, the NTSB will treat employee names as confidential).

- Beta's "Blue Crew" conducted an H2S/Fire/Earthquake Drill on September 26, 2021. There were designated Drill Coordinators. The drill involved an earthquake; the earthquake triggered an H2S leak near the sulfa treat scrubber and also caused a fire after a worker dropped a welding lead while running for safety. We will provide a document that shows the Beta employees who attended the drill (and we trust that consistent with our prior practice, the NTSB will treat employee names as confidential).

6. *Please describe the names, titles, and dates of the controllers, PIC, and [other involved in leak response decision-making] who completed the CPM Leak Detection covered task. Provide the details of the qualification for this task.*

As we explained in response to 4(b), Beta did not require controllers or the PIC to take CPM Leak Detection training including because those individuals are not responsible for maintenance of the Atmos LDS system. As of the date of the accident, training on the Leak Detection System was also conducted as a combination of on-the-job training, hands-on experience with the Leak Detection System, and OQ training modules. *See, e.g.*, Ex. 16, CSInc017009. Employees also received on-the-job training on how to conduct manual leak detection.

Thanks,
Jeff

From: Kim West <[redacted]@ntsb.gov>
Sent: Wednesday, October 11, 2023 1:35 PM
To: Jeff Ortloff <[redacted]@amplifyenergy.com>
Cc: Sara Lyons [redacted]@ntsb.gov>

Subject: [EXTERNAL]RE: Huntington Beach, CA (DCA22FM001) - Request for information 2 - updated training

CAUTION: EXTERNAL EMAIL

Hi Jeff,

I am just checking to see if have had a chance to find the information describe below?

Thank you,

Kim L. West
Pipeline Accident Investigator
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C: [redacted]
Email: [redacted]@ntsb.gov

From: Kim West
Sent: Thursday, October 5, 2023 4:01 PM
To: Jeff Ortloff [redacted]@amplifyenergy.com) <J[redacted]@amplifyenergy.com>
Cc: Sara Lyons [redacted]@ntsb.gov>
Subject: Huntington Beach, CA (DCA22FM001) - Request for information 2 - updated training

Good afternoon, Jeff,

There are a few more documents that I am requesting as part of our investigation into the release. Could you provide copies of the documents and place them in the SharePoint site Kiteworks or respond to this email. The documents are as follows:

- Provide Atmos LD 2001 Operation Manual
- Could you provide a describe of the leak alarm tags that are indicated in the Alarms_OCT 1-3 Excel spreadsheet containing the various alarms. In particular, please indicate the description of the following leak alarm codes indicate: 14_ALM_Atmos_Leak_Detected and 10_ALM_Leak_Detect_From_Atmos
- List of OQ covered tasks Amplify required its controllers, PIC, and [other involved in leak response decision-making] to hold.
- Training and examination materials for the following covered tasks, as of the date of the accident. If abnormal operating conditions are covered generically, include the associate training and examination materials, as of the date of the accident.
    - Control Center Operations of a Pipeline, Including Startup/shutdown
    - CPM Leak Detection
- Describe the most recent (pre-accident) control room team training and exercised that included both controllers and other individuals who would reasonable be expected to operationally collaborate with controllers during normal, abnormal or emergency situations.

Please provide the dates and the make up of the team members at each session.

- Please describe the names, titles, and dates of the controllers, PIC, and [other involved in leak response decision-making] who completed the CPM Leak Detection covered task. Provide the details of the qualification for this task.

Thank you again for your help,

Regards,

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