



System Owner:
CAPTUREPOINT LLC
1101 Central Expressway South
Suite 150
Allen, Texas 75013

Emergency Response Plan



IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS

Panhandle

CAPTUREPOINT LLC Contacts		
CAPTUREPOINT LLC 24-Hr Emergency Call for pipeline incidents and emergencies		806-766-4770
Lighthouse Control Room		
Arkalon Plant Supervisor		
Director of Operations	Taylor Coleman	918-728-0133
Director of HSE	Matt Gross	325-668-4213
PHMSA Compliance	Chris Moody	713-376-8499
Panhandle Superintendent	Josh Burkhart	405-423-2498
Panhandle Lead Field Technician	Austen Pitts	806-202-4186
Panhandle Field Technician	Steve Diaz	620-391-9514
CAMS Manager of Regulatory Compliance	Phil Anderson	501-269-5215
CAMS Director – Engineering, Compliance & Ops	Jamie Kilpatrick	832-581-7806
Local Emergency Contacts – First Responders		
Emergency	Police, Fire, Medical	911
Seward County, KS Services	Sheriff's Department	620-309-2000
Seward County, KS Services	Fire Department	620-626-3267
Seward County, KS Services	Emergency Management	620-626-3265
Seward County, KS Services	Ambulance	620-626-3275
Beaver County, OK Services	Sheriff's Department	580-625-4261
Beaver County, OK Services	Volunteer Fire Department	580-625-3333
Beaver County, OK Services	Emergency Management	580-625-3498
Beaver County, OK Services	Ambulance	580-377-3338
Hutchinson County, TX Services	Sheriff's Department	806-274-6343
Hutchinson County, TX Services	Fire Department	806-273-0948
Hutchinson County, TX Services	Emergency Management	806-878-4050
Hutchinson County, TX Services	Ambulance	806-467-5616
Hansford County, TX Services	Sheriff's Department	806-659-4140
Hansford County, TX Services	Volunteer Fire Department	806-659-5511
Hansford County, TX Services	Emergency Management	806-659-4100
Hansford County, TX Services	Ambulance	806-659-5511
Ochiltree County, TX Services	Sheriff's Department	806-435-8000



Ochiltree County, TX Services	Volunteer Fire Department	806-345-3000
Ochiltree County, TX Services	Emergency Management	806-435-8000
Ochiltree County, TX Services	Ambulance	806-345-3000
Local Emergency Contacts - Vendors		
Sand Creek Pipeline	Kevin Williams	620-391-6888
Lon's Welding & Oilfield Services	Jerry Denton - Owner	806-435-0309
	Kris Lincycomb – Foreman	806-202-5939
	Francisco Chairez - Welder	806-202-2379
Independent Welder	Jerry Paisley	806-886-6715
ACE – NDT & X-ray	Tommy Anderson – Owner Cuke - Tech	903-780-4386 806-228-5482
Mach Energy	Brandon Madden	405-659-6942

Coffeyville

CAPTUREPOINT LLC. LLC Contacts		
CAPTUREPOINT LLC 24-Hr Emergency Call for pipeline incidents and emergencies		806-741-7012
Lighthouse Control Room		
Coffeyville Plant Supervisor		
Shidler Field Office		
Director of Operations	Taylor Coleman	701-732-0742
Director of HSE	Matt Gross	325-668-4213
PHMSA Compliance	Chris Moody	713-376-8499
Coffeyville Superintendent	Michael Godfrey	405-651-9651
Coffeyville Technician	James Kennedy	405-308-6759
CAMS Manager of Regulatory Compliance	Phil Anderson	501-269-5215
CAMS Director – Engineering, Compliance & Ops	Jamie Kilpatrick	832-581-7806
Local Emergency Contacts – First Responders		
Emergency	Police, Fire, Medical	911
Montgomery County, KS Services	Sheriff's Department	620-330-1000
Montgomery County, KS Services	Fire Department	620-252-6148
Montgomery County, KS Services	Emergency Management	620-330-1213
Montgomery County, KS Services	Ambulance	620-252-1501



Nowata County, OK Services	Sheriff's Department	918-273-2287
Nowata County, OK Services	Volunteer Fire Department	918-255-6372
Nowata County, OK Services	Emergency Management	918-273-1936
Nowata County, OK Services (Coffeyville EMS)	Ambulance	620-252-1501
Washington County, OK Services	Sheriff's Department	918-332-4000
Washington County, OK Services	Volunteer Fire Department	918-532-4738
Washington County, OK Services	Emergency Management	918-331-2710
Washington County, OK Services	Ambulance	918-336-1111
Osage County, OK Services	Sheriff's Department	918-287-3535
Osage County, OK Services	Fire Department	918-287-4210
Osage County, OK Services	Emergency Management	918-287-2285
Osage County, OK Services (Bartlesville EMS)	Ambulance	918-336-1111
Local Emergency Contacts - Vendors		
Arrowhead Pipeline Services	Lou Ann Smith	918-287-2110
Mach Energy	Brandon Madden	405-659-6942

State & Federal Agencies	
AGENCY	TELEPHONE NUMBERS
National Response Center – NRC	1-800-424-8802 or 202-267-2675
Oklahoma Emergency Notification - 1 hour requirement	405-521-2258 or 405-521-2111 (AH)
Texas Emergency Notification – 1 hour Notification	844-773-0305 or 512-463-6788
Kansas Emergency Notification – 1 hour Notification	785-271-3165 or 785-633-6228 (AH)
PHMSA Pipeline Safety Southwest Region – TX & OK	713-272-2859
PHMSA Pipeline Safety Central Region – KS	816-329-3800



Emergency Response Plan

Revision A

**Revision Modification Log**

This document shall be reviewed for effectiveness at least once each calendar year, but with intervals not exceeding 15 months and either issued as a new version or reaffirmed by the CAMS Regulatory Compliance Manager or designee.

This log references revisions to the CAPTUREPOINT LLC Emergency Response Plan.

Rev	Revision Date	Sections	Summary of Revisions
A	02/06/2026	All	New CAMS O&M Manual

Record of Plan Review

Reviewer	Date Reviewed	Description of Review
Everline	02/04/2025	Final use of that O&M
Phil Anderson	02/06/2026	Implement CAMS O&M

Distribution and Controlled Copy List

Personnel/Title	Location
Electronic Version	SharePoint



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1 INTRODUCTION

The CAPTUREPOINT LLC Emergency Response Plan mitigates the threat and environmental impact of a pipeline emergency or incident. This emergency response plan is mandated by 49 CFR Part 195.402.

The CAPTUREPOINT LLC Emergency Response Plan provides guidance, direction, and a procedural response for a pipeline incident or pipeline emergency. Employees, contractors, and/or third-party support, as applicable, are responsible for plan familiarity and plan execution.

1.1 Pipeline Owner

*CAPTUREPOINT LLC,
1101 Central Expressway South, Suite 150
Allen, Texas 75013*

1.2 Scope

The CAPTUREPOINT LLC Emergency Response Plan provides minimum requirements for receiving, identifying, classifying, reporting, responding to, and recovery from a pipeline incident or pipeline emergency, that could adversely affect public safety, CAPTUREPOINT LLC employees, contract employees, property, and/or the environment.

- All potential and confirmed pipeline incidents and pipeline emergencies shall be reported to CAPTUREPOINT LLC Management.
- Interconnecting pipelines, suppliers, customers, responders, regulatory agencies, medical support, law enforcement, and others, as appropriate, shall be notified.

1.3 Purpose

The purpose of this manual is to:

- Resource personnel with an approved, procedural response to a pipeline incident or pipeline emergency
- Qualify personnel for a timely response to a pipeline incident or pipeline emergency.
- Minimize risk and eliminate hazards to life, property, and the environment.
- Establish requirements for emergency procedures.
- Provide guidelines for liaison with emergency responders.
- Provide for timely recognition, response, and reporting.

1.4 Policy

CAPTUREPOINT LLC shall have procedures for receiving, identifying, classifying, reporting, and responding to pipeline incidents and pipeline emergencies.



- All records for CAPTUREPOINT LLC should be secured, maintained, and retained in the CAPTUREPOINT LLC SharePoint, in accordance with the regulatory requirements and the CAPTUREPOINT LLC Compliance Manuals.

CAPTUREPOINT LLC shall provide for:

- Emergency Response procedures that include appropriate notifications to fire, police, and other appropriate public officials
- Emergency response training and procedure evaluation for effectiveness shall be conducted with operational and response personnel at least once each calendar year, but with intervals not exceeding 15 months.
- Corrective actions, as appropriate.

1.5 Safety Commitment

Personal safety, public safety, and environmental protection are top priorities for CAPTUREPOINT LLC. Employees and contractors shall understand, support, and model the CAPTUREPOINT LLC commitment to safety and environmental integrity by complying with safety requirements and procedures that support and enforce personal safety and pipeline safety.

1.6 Roles and Responsibilities

CAPTUREPOINT LLC management, supervision, control room personnel, field personnel, and designated support personnel share responsibility for the safe, efficient, reliable operations of the CAPTUREPOINT LLC system.

Field supervision, field personnel, and designated support personnel shall be trained for proficiency with procedures and instructions for the immediate deployment and execution of the CAPTUREPOINT LLC Emergency Response Plan.

Designated CAPTUREPOINT LLC designated personnel have the authority to shut down the pipeline facility or any portion of the system when a leak, pipeline failure, or similar condition presents an immediate hazard to people or property.

CAPTUREPOINT LLC management, regulatory administration, and others, as appropriate, should be notified as early as possible of a pipeline incident, or pipeline emergency. Notifications should not delay the timely shutdown of a pipeline or facility that presents immediate hazards or risk to life or property.



2 REFERENCES

2.1 CODE OF FEDERAL REGULATIONS (CFR)

SECTION	DESCRIPTION
All	49 CFR §195.402(e) - Emergencies

2.2 CAPTUREPOINT LLC Manuals

SECTION	DOCUMENT
5	O&M Manual, Section 8 - Annual, Incident, & SRC Reporting
5.1.5, 5.4, 5.4.2, 5.4.3, 5.7, 5.11	O&M Manual - Section 8.10 - Operator Assistance in Investigations
5.10	O&M Manual - Section 12.19 - Pipeline Repairs
5.4	O&M Manual - Section 12.27 - Security Plan
7	Public Awareness Manual
5.4	Operator Qualifications Manual – Incident/Incident Evaluations

2.3 CAPTUREPOINT LLC Procedures

SECTION	DOCUMENT
5.1.5, 5.11	Root Cause Analysis & Pipeline Failure Investigation Procedure

2.4 CAPTUREPOINT LLC Forms/Reports

SECTION	DESCRIPTION
5.1.1, 5.1.5, 5.4, 5.7, 5.9.2	Emergency Call Report
5.1.5, 5.4, 5.11	Root Cause Analysis and Pipeline Failure Investigation Form
6, 7	Training Roster and Liaison with Stakeholders Form



3 DEFINITIONS AND ABBREVIATIONS – 49 CFR §195.2

TERM	DESCRIPTION
Abnormal Operating Condition (AOC) 49 CFR §195.402(d)	Operating design limits have been exceeded due to pressure or flow rate change outside the limits of normal operations, or there is a malfunction of a component, deviation from normal operations, or personal error, and the occurrence does not constitute an emergency, but could escalate into an emergency if not promptly corrected.
Alarm	An audible or visible means of indicating to the controller that equipment or processes are outside operator defined, safety-related parameters.
Annually	At least once each calendar year, but with intervals not exceeding 15 months.
Barrel	A unit of measurement equal to 42 US standard gallons
Breakout Tank	A tank used to: a) Relieve surges in a hazardous liquid pipeline system or b) Receive and store hazardous liquid transported by a pipeline for reinjection and continued transportation by pipeline.
Confirmed Discovery	When it can be reasonably determined, based on information available to CAPTUREPOINT LLC at the time a reportable event has occurred, even if only based on a preliminary evaluation.
Corrosive Product	“Corrosive material” as defined by §173.136
DOT	Department of Transportation
Emergency	A leak can be an emergency even if it does not cause the closure of major roads or highways. A situation or events affecting operations of a pipeline that requires an immediate, coordinated action or response to protect the safety of people or to limit damage to property and/or the environment.
Emergency Plan (ERP)	The written procedure for responding to emergencies on CAPTUREPOINT LLC facilities
ESD	Emergency Shutdown
EH&S	Health, Safety, Security, Environmental
Event	Either a pipeline incident or pipeline emergency
Flammable Product	“Flammable Liquid” as defined by §173.120
Grade 1 Leak	A leak that presents an immediate or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous. Shall be promptly repaired, if not repaired immediately upon detection
Grade 2 Leak	A leak that is recognized as being non-hazardous at the time of detection, but requires scheduled repair based on probable future hazard. Shall be monitored and reevaluated at least once every six months until cleared
Grade 3 Leak	A leak that is non-hazardous at the time of detection and can be reasonably expected to remain non-hazardous. Shall be monitored and reevaluated during the next scheduled leak survey, or within 15 months of the date reported, whichever occurs first, until the leak is cleared



TERM	DESCRIPTION
Hazard to Navigation	A pipeline where the top of the pipe is less than 12" below the natural bottom in waters less than 15' deep, as measured from the mean low water.
Hazard Liquid	Petroleum, Petroleum Products, anhydrous ammonia, and ethanol or other non-petroleum fuel, including biofuel, which is flammable, toxic, or would be harmful to the environment if released in significant quantities.
Highly Volatile Liquid (HVL)	A hazardous liquid which will form a vapor cloud when released to the atmosphere and which has a vapor pressure exceeding 40 psia at 100degF
ICS	Incident Command System
Incident	A condition or event that results in bodily harm or property damage that the operator neither expected nor intended
NRC	National Response Center - must be notified within 1 hour of discovery
O&M	Operations and Maintenance
Petroleum	Crude Oil, condensate, natural gasoline, natural gas liquids, and liquified petroleum gas
Petroleum Product	Flammable, toxic, or corrosive products obtained from distilling and processing of crude oil, unfinished oils, natural gas liquids, blends stocks and other miscellaneous hydrocarbon compounds.
PHMSA	Pipeline and Hazardous Materials Safety Administration
Rural area	Outside the limits of any incorporated or incorporated city, town, village, or any other designated residential or commercial area such as a subdivision, a business or shopping center, or community development.
Safety Related Condition (SRC)	A condition that could lead to an imminent hazard or pipeline shutdown and causes a 20% or more reduction in operating pressure.
Toxic Product	"Poisonous material" as defined by §173.132
Unusually Sensitive Area (USA)	A drinking water or ecological resource area that is unusually sensitive to environmental damage from a hazardous liquid pipeline release, as identified under §195.6

4 SYSTEM DESCRIPTION

The CAPTUREPOINT LLC system is operated and maintained by CAPTUREPOINT LLC and designees. The system description is found in the O&M Manual.

Reference Section 6 of the CAPTUREPOINT O&M Manual

5 EMERGENCY RESPONSE – 49 CFR §195.402(E) & §195.403(C)

CAPTUREPOINT LLC personnel and supporting entities shall maintain a thorough knowledge of emergency response procedures to ensure:

- National Response Center (NRC) notification within 1 hour of confirmed discovery of an incident.
- Kansas State Police & PRC notification within 1 hour of confirmed discovery of an incident.
- Texas Emergency Hotline notification within 1 hour of confirmed discovery of an incident.



- The receipt, identification, and classification of an emergency
 - *Reference Section 5.1 of this Emergency Response Plan*
- An immediate, effective response
 - *Reference Section 5.4 of this Emergency Response Plan*
- A collaborative response with local officials and emergency response agencies
 - *Reference Section 5.2 of this Emergency Response Plan*
- Proper notifications
 - *Reference Section 5.9 of this Emergency Response Plan*
- Proper documentation
 - *Reference Section 5.11.3 of this Emergency Response Plan*
- Regulatory compliance as it pertains to investigating failures
- Timely, accurate reporting
 - *Reference O&M Manual, Section 8*

The CAPTUREPOINT LLC markers, facility signs, brochures, and distribution materials shall clearly communicate the 24-hour contact number, as well as guidelines for reporting pipeline incidents and emergencies.

Notifications shall be made to CAPTUREPOINT LLC's internal emergency response personnel and/or incident command team, emergency response contractors, federal, state, and local agencies, external emergency contacts, and others, as appropriate.

Reference the IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS Table at the beginning of this manual

5.1 Receiving, Identifying & Classifying Notices of Events

CAPTUREPOINT LLC classifies events as a pipeline emergency.

5.1.1 Process Flow for Events Received

The emergency call recipient shall notify the pipeline field technician, and others, as appropriate, and disperse relevant information for an expedient response.

The *CAPTUREPOINT LLC Emergency Call Report* should be used when receiving, identifying, and classifying notices of events.

- All pertinent information should be documented, including a chronological record of incoming information, notifications, and actions taken.
- The pipeline field technician, or designee, will assume temporary command and control responsibilities, pending event resolution or approved handoff of responsibility. The pipeline field technician will dispatch immediate response personnel and notify immediate supervisor.



- Pipeline field technician, or designee shall:
 - Dispatch emergency response personnel, as appropriate.
 - Resource emergency response personnel.
 - Initiate local notifications to property owners, local public officials, etc.
 - Confirm severity and location of the leak.
 - Initiate segment isolation, if necessary, by closing the appropriate valves.
- First responders shall:
 - Be trained to recognize, identify, classify, respond, and report pipeline incidents/emergencies, as appropriate.
 - Proceed in a safe, expedient manner to ensure a safe on-site arrival.
 - Perform initial hazard assessment from a safe distance. These may include, but not limited to:
 - Giving special attention to any overhead powerlines.
 - The possibility of multiple leaks.
 - Report severity and location to the pipeline field technician.
 - Log and report, as follows:
 - Name, address, and Identification number of CAPTUREPOINT LLC
 - Name or number of the reporter
 - Time of event
 - Location of event
 - Any fatalities and/or personal injuries
 - Reason for event, if known
 - Estimated volume release, if known
 - Weather conditions, and
 - On-site actions taken or planned
 - Any other significant factors known
- The Incident Commander or designee shall:
 - Ensure personnel accessibility.
 - Confirm event classification.
 - Perform incident and/or emergency evaluation.
 - Notify CAPTUREPOINT LLC Management.



- Establish, maintain, and coordinate response activity and communications among responders and support services.
 - If applicable, initiate regulatory required notifications to PHMSA, NRC, State Police, and others, as appropriate.
 - Expand notifications, as appropriate, to include senior management, HSE, emergency contractors, etc.
 - Provide CAPTUREPOINT LLC Management, with regular updates on the incident status.
 - Activate Incident Command System, if necessary.
 - Open conference line to facilitate communications.
 - If deployed, Incident Commander shall:
 - ❖ Deploy Incident Command System.
 - ❖ Assign and deploy incident command team and third-party support.
- Reference Table 5.4: Incident Management Plan and Section 7 of this Emergency Response Plan.*
- Notify, as required by *Table: 5.1 Notification Guidance*, as follows:
 - What is about to happen or what has happened?
 - Where did it take place?
 - Who is involved?
 - When did it happen?
 - How did it happen?
 - The extent of damage, if known; and
 - What aid is needed?

Table 5.1: Notification Guidance

RESPONDER INITIALS AND TIME STAMP	TASK
	Notify emergency response personnel/organizations
	Notify the National Response Center
	Notify the respective State Emergency Notification
	Notify local emergency responders
	Notify emergency contractors



5.1.2 Field Personnel Reporting Procedure

- Notify the pipeline field technician as soon as possible.
- Communicate wind direction, proximity to the nearest house, building, road, etc.
- Communicate the existence of liquid on the ground, fire, or other pertinent information.
- Take immediate action to protect people, property, and the environment.
- **If safe to do so**, attempt to minimize public exposure.

5.1.3 Classifying Notices of Events

Field personnel shall be trained to serve as a first responder until relieved by a supervisor, incident commander, or other CAPTUREPOINT LLC designee. Field personnel shall follow herein prescribed guidelines to effectuate an appropriate response and quickly disseminate mission critical information. *Reference Sections 5.1.3.1, 5.1.3.2, 5.1.3.3*

- Special consideration should be given to the possibility of multiple leaks.
- Designated company employees and contractors are trained to recognize conditions that could potentially result in a Safety Related Conditions (SRC), and the corrective action that should be taken in the event of an SRC.
- Emergencies are classified into one of three levels to ascertain an appropriate response. Upon confirmation of an emergency condition, appropriate action shall be initiated IMMEDIATELY!

5.1.3.1 Class 1 Emergency

Any event that has the potential to escalate due to fire, explosion, increased release, etc.

- Characterized by having a high risk to public safety, property, or the environment.
- Will likely require heavy involvement from outside agencies for an extended duration.

5.1.3.2 Class 2 Emergency

Any event that has the potential to escalate due to fire, explosion, increased release, etc.

- Characterized by having a medium to high safety and environmental risk with possible involvement of outside agencies.
- May be of extended duration, requiring multiple emergency crews and resources.



5.1.3.3 Class 3 Emergency

Any event that has a low potential to escalate and would not likely result in property damage or threat to life but could become hazardous without immediate attention.

- Minor in nature and usually handled by on-site personnel with minimal outside involvement.
- Typically, short in duration, presenting low safety or environmental risk.

5.1.4 Criteria for a Reportable Incident - §195.50

Failure in a pipeline system in which there is the release of a hazardous liquid that results in any of the following:

- Explosion or fire not intentionally set by CAPTUREPOINT LLC.
- Any release resulting in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused by discoloration of the surface of the water or adjoining shoreline, or depositing a sludge or emulsion beneath the surface of the water or upon adjoining shoreline.
- Release of 5 gallons or more of hazardous liquid, except that no report for a release of less than 5 barrels resulting from a pipeline maintenance activity if the release is:
 - Confined to company property or pipeline ROW, and
 - Cleanup up promptly
- Death of any person.
- Personal injury necessitating hospitalization.
- Estimated property damage as well as the cost of clean-up, recovery, and lost product value exceeding \$50,000.
- In the judgement of CAPTUREPOINT LLC was significant even though it did not meet the criteria of any other situation above. *Reference Section 5.1.6.*

5.1.5 Recordkeeping

Initial response records shall be secured, retained, and maintained by the first responders, or an on-site designee. Records should be recorded on the *CAPTUREPOINT LLC Emergency Call Report*, or any means available, as supplementary documentation for the *CAPTUREPOINT LLC Failure Investigation Form*. Records shall include, but are not limited to:

- Time of arrival on scene.
- Time of Event.



- Time hazardous liquid flow is suspended.
- If hazardous liquid is escaping:
 - Time affected segment is isolated.
 - Time isolation valves closed and locked.
- Other time stamps, as appropriate.
- Action, equipment, and material used to facilitate response and/or alleviate the emergency.
- Records shall be retained for five years.

Reference the CAPTUREPOINT LLC Emergency Call Report

Reference the CAPTUREPOINT LLC Failure Investigation Form

5.1.6 Regulatory Reporting

The CAMS Regulatory Compliance Manager, or designee, shall be responsible for verbal and written reports required by:

- Pipeline and Hazardous Materials Safety Administration (PHMSA)
 - After initial telephone notification to the NRC submit written incident form PHMSA F 7100-1 as soon as practical, but no later than 30 days following discovery.
 - Whenever CAPTUREPOINT LLC receives any changes in the information reported or additions to the original report (*DOT F 7100-1*), it shall file a supplemental report within 30 days.
 - Forms should be submitted electronically at <http://opsweb.phmsa.dot.gov>.
- Kansas/Oklahoma/Texas State Agencies
- Other applicable agencies

Reference CAPTUREPOINT LLC O&M Manual, Section 8.3, for Incident reporting requirements.

Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan for Regulatory Agency contact information.

5.2 Establishing & Maintaining Communications with Appropriate Fire, Police & Public Officials - §195.402(e)(7)

The CAPTUREPOINT LLC incident responder, incident commander, or qualified designee shall notify and coordinate an effective response protocol with local emergency responders, fire responders, law enforcement, and other public officials. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan*



The CAMS Regulatory Compliance Manager, designee, or third-party support shall coordinate, plan, schedule, and execute mutually beneficial response training exercises.

5.3 Public Relations

All inquiries from the news media should be referred to Management, or a management designee to ensure consistency and accuracy.

5.4 Prompt & Effective Response to Each Type of Emergency - §195.402(e)(2)

CAPTUREPOINT LLC emergency response personnel shall work collaboratively with fire, police, emergency responders, and public officials to ensure an effective response to emergencies. Information sharing and training sessions shall be utilized to facilitate a co-operative response.

Communications at the scene of an incident are under the control of a CAPTUREPOINT LLC designee.

The information officer will be responsible for communications to CAPTUREPOINT LLC Management.

The incident commander or assigned designee will be delegated to:

- Effectuate communications among relevant entities.

Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan

- Lead the efforts to protect life, property, and environment.
- Lead the efforts to minimize risk and hazards.
- Establish and maintain communications with appropriate fire, police & public officials.

Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan

- Ensure that qualified personnel suspected of contributing to a pipeline emergency are removed from performing the covered tasks pending investigation.

Reference the Operator Qualifications Manual - Section 6.6

- Ensure that personnel suspected of contributing to a pipeline incident or emergency are sent for a drug and alcohol test as soon as practicable following an incident, preferably within 2 hours, but no later than 8 hours for alcohol and 32 hours for drugs after the incident.
 - If a test, required by §199.225 (alcohol) and §199.105 (drugs) is not administered within 2 hours following an incident, prepare and maintain on file a record stating the reasons the test was not promptly administered. If a test required by paragraph (a) of §199.225 is not administered within 8 hours following the incident, CAPTUREPOINT LLC shall cease attempts to administer an alcohol test and shall state in the record the reasons for not administering the test. If a test required by §199.105 is not administered within 32



- hours following the incident, CAPTUREPOINT LLC shall cease attempts to administer a drug test and shall state in the record the reasons for not administering the test.
- Be narrowly focused on emergency related activity. Notifications should be a delegated responsibility
 - References:
 - *CAPTUREPOINT LLC Abnormal Operations Report*
 - *CAPTUREPOINT LLC Product Leak or Line Break Incident Response Procedure*
 - *CAPTUREPOINT LLC Product Leak and Investigation Report*
 - *CAPTUREPOINT LLC Failure Investigation Procedure*
 - *CAPTUREPOINT LLC Pipeline Failure Investigation Form*
 - *CAPTUREPOINT LLC Incident Management Plan - Section 8 of this Emergency Response Plan with guidelines in Table 5.4*
 - *CAPTUREPOINT LLC O&M Manual, Section 5: Security Plan*
 - *CAPTUREPOINT LLC O&M Manual, Section 8.3: Incident reporting*

Table 5.4 – Incident Management Plan

STEPS	ACTIONS
Approach	1) Wear PPE. 2) Plan for worst case scenario and ensure PPE. 3) Proceed cautiously and avoid positioning self or vehicle in a hazardous position. 4) Identify hazards (explosive atmosphere, ignition sources, accessibility obstacles). 5) Consult SDS, if required.
Assess	1) Fully assess the situation <u>before</u> helping others. 2) Weather, terrain, and immediate environment. 3) Who/what is at risk (people, property, equipment, environment)? 4) What can be done immediately and what actions should be taken?
Obtain Help	1) Call 9-1-1 for emergency services, as required. 2) Notify others (e.g., backup assistance, immediate supervisor, emergency responders, law enforcement, medical support), as required. 3) Notify responsible agencies (primarily a function of the emergency support team).
Secure	1) Establish an initial isolation zone/emergency planning zone. 2) Ensure that all personnel in the immediate area are aware of the emergency. 3) Take required actions to restrict access and establish controls. 4) Evacuate, as required. 5) Sound evacuation alarm, if applicable. 6) Establish a safe meeting area near the Incident site.



STEPS	ACTIONS
Respond <i>Reference Section 5.5 for Emergency Response Equipment</i>	1) Establish incident commander and necessary ICS positions. 2) Determine location for incident command post and staging area. 3) Determine Incident objectives and complete Incident Briefing. 4) Continually update status log with significant actions taken. 5) Complete and implement Health and Safety Plan. 6) Eliminate hazards (e.g., ignition sources). 7) Take action to shut down, isolate, control, or contain. 8) Establish a perimeter. 9) Establish and commence with tactical response plan. 10) If rescue is required, establish escape route, and if safe, initiate rescue. 11) Confirm that emergency services have been dispatched if previously contacted. 12) Continually reassess. 13) Secure Hot Work Equipment (if needed).
Briefing	1) Complete Incident Briefing.
Note	The Incident Command System is a standardized approach to the command, control and coordination of emergency response providing a common hierarchy within which responders from multiple disciplines can be effective.

5.4.1 Response to Pipeline Leak

NOTE: Circumstances may require changing the order in which these guidelines are implemented.

General procedure for responding to a pipeline leak:

- All company employees have the authority to initiate procedures to shut down any pipeline or pipeline facility suspected of having a leak that poses threat to life or property.
- Notify the pipeline field technician, as soon as possible.
 - Provide a detailed description of the leak, including the existence of a fire, damage, or other pertinent information.
 - Confirm the exact location of the leak. If the location of the leak is unknown, immediately mobilize a patrol to determine its exact location.
 - First responder, designee, or backup support shall assess and determine appropriate response.
- If it is determined to be an emergency, the Pipeline Field Technician, or designee shall initiate the Emergency Response Plan.
Reference Table 5.4 – Incident Management Plan
- Stop or reduce the flow at the leak site.
 - Prompt action is required at the leak site to stop or reduce the leak and minimize the impact of the release.



- Based on site conditions and incident circumstances (line profile, proximity and location of valves and tanks), this may include, but is not limited to:
 - ❖ Shutting down pumps
 - ❖ Diverting flow
 - ❖ Closing block valves to isolate flow to the leak area
- Dispatch qualified personnel to the site to assist with flow diversion, segment isolation, and other response support, as necessary.
- Notify responders, suppliers (CO₂), and others, as appropriate. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan*
- Mobilize and deploy appropriate response personnel and equipment. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan*
- Upon pipeline shutdown after emergency response, the affected line may not be restarted until approval is obtained from CAPTUREPOINT LLC Director of Operations, or designee.
- Investigate the cause of the emergency and take corrective action.
- Share lessons learned to prevent recurrence of a similar emergency.

5.4.2 Fire or Explosion Located Near or Directly Involving a Pipeline Facility - §195.402(e)(2)

First Responders should approach areas affected by the emergency condition with caution. **Personal safety is a priority!** *Reference Table 5.4: Incident Management Plan.*

If safe to do so, proceed as follows:

- Assess the situation and determine the most effective and safest response strategy.
- Establish and enforce a safe perimeter.
- Account for all personnel.
- Consider the potential for migration, or extent of product movement.
- Evacuate premises/area, as needed and/or appropriate.
- Eliminate sources of ignition.
- Request assistance.
- Notify appropriate CAPTUREPOINT LLC personnel.
- Notify external emergency response support.



- Isolate affected pipe from ignition source.
- Do Not extinguish a fire unless trained to do so, and necessary to protect life.
- Extinguish residual fire, if properly equipped and trained, and **if safe to do so**.
- Establish and secure safe work area for staging and entry.
- Consider potential effect on pipeline segments adjacent to failed section (if applicable), and communicate risk, as appropriate. Implement protective measures, **if safe to do so**.
- Notify affected entities, as required.
- Secure hot work equipment, if needed.
- Prior to repairs, remediation, and recovery, approval may be required by local, state, or federal regulatory agencies.
- All pertinent data shall be collected, secured, documented, and retained for incident analysis and root cause investigation.
- Report, as required by PHMSA and State Agencies.
- References:
 - *CAPTUREPOINT LLC Failure Investigation Procedure*
 - *CAPTUREPOINT LLC Failure Investigation Form*

5.4.3 Natural Disaster - §195.402(e)(2)

CAPTUREPOINT LLC shall respond promptly and effectively to any pipeline damage resulting from an incident or natural disaster that threatens life, property, or the environment.

First Responders should approach areas affected by the emergency condition with caution. **Personal safety is a priority!** *Reference Table 5.4: Incident Management Plan.*

If safe to do so, proceed as follows:

- Establish and enforce a safe perimeter.
- Account for all personnel.
- Consider the potential for migration, or extent of product movement.
- Evacuate premises/area, as needed and/or appropriate.
- Eliminate sources of ignition.
- Isolate affected pipe from product source, if applicable.
- As appropriate, extinguish fire, if properly equipped and trained, and **if safe to do so**.



- Request assistance.
- Establish and secure safe work area for staging and entry.
- Consider potential effect on adjacent pipeline segments (if applicable)
- Notify affected entities, as required. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan.*
- Secure hot work equipment, if needed.
- Report, as required by PHMSA and State Agencies.
- Prior to repairs, remediation, and recovery, approval may be required by local, state, or federal regulatory agencies.
- All pertinent data shall be collected, secured, documented, and retained for incident analysis and root cause investigation.
- References:
 - *CAPTUREPOINT LLC Failure Investigation Procedure*
 - *CAPTUREPOINT LLC Failure Investigation Form*

5.4.3.1 Tornado or Severe Thunderstorm

- Tornadoes may be monitored and detected by:
 - Listening to news reports; know the difference between tornado watch and tornado warning.
 - Sighting of a funnel cloud formation on the ground or in the sky.
 - Hearing a roar that sounds like a jet or a train.
- If a tornado is a direct threat to a pipeline facility:
 - Contact the appropriate CAPTUREPOINT LLC personnel. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan.*
 - Shutdown the facility, if deemed appropriate and approved.
 - Inform others and take appropriate shelter.
 - Indoors
 - Avoid windows.
 - move to a central part of building or bathroom.
 - Under heavy furniture.
 - Outdoors.
 - Move away from storm's path.



- Seek shelter in a depression, ditch, or ravine.
- After the tornado passes, assess damage, and notify emergency response personnel as needed. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan*
- **If safe to do so**, correct damage to facilities and restart operations, upon approval.

5.4.3.2 Hurricane

- When a hurricane threatens:
 - Monitor news reports and plot hurricane movement; know the difference between a hurricane watch and hurricane warning.
 - Determine which pipeline facilities will be affected by the hurricane.
 - Contact appropriate CAPTUREPOINT LLC personnel. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS. of this Emergency Response Plan.*
 - CAPTUREPOINT LLC management will decide whether the pipeline system will be attended and/or operated during the hurricane.
- Preparation:
 - Secure equipment that will be susceptible to damage from high winds.
 - Board or tape windows.
 - Arrange for first aid, drinking water, emergency lighting and food, if management decides to have the facility attended during the hurricane.
 - Maintain adequate inventory to prevent tanks from floating.
 - Alert emergency responders to let them know if the facility will be attended during the hurricane. When hurricane hits:
 - Monitor hurricane's progress.
- After the hurricane hits:
 - Assess damage to the pipeline system.
 - Call emergency responders and let them know status of your situation.



- **If safe to do so**, correct damage to facilities and restart operations, upon approval

5.4.3.3 Flooding

- Before and during the flood:
 - Monitor news reports for flood status.
 - Contact the appropriate CAPTUREPOINT LLC personnel. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan.*
 - CAPTUREPOINT LLC management will decide whether the pipeline system will be attended and/or operated during the flood.
 - **If safe to do so**, assess flood conditions:
 - Evaluate accessibility of block valves that may be needed to isolate water crossings or other sections of the pipeline.
 - Frequently determine if the pipeline is exposed.
 - Frequently determine if any new river channels have been cut along the pipeline by the flooding.
 - Frequently determine if facilities which are normally above ground have become submerged and are in danger of being struck by vessels or debris. If so, those facilities should be marked or protected.
- After the flood:
 - Assess damage to exposed pipeline and equipment.
 - Assess damage and notify emergency response personnel as needed. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan.*
 - Conduct surveys as needed to determine depth of cover for pipelines affected by the flood.
 - **If safe to do so**, correct damage to facilities and restart operations, upon approval.
 - Replace or repair missing or damaged pipeline markers and signs.

5.4.3.4 Earthquake

- During an earthquake, the following actions should be taken:



- If indoors, stay inside and stand in the doorway or get under heavy furniture, Stay away from windows.
- Avoid objects such as light poles, buildings, trees and telephone and electric wires.
- If you are in a vehicle, avoid underpasses/overpasses and other potential hazards.

5.4.3.5 Preplanning

Weather forecasters sometimes issue warnings to alert the public of potential natural disasters. When warnings are issued, the following items should be considered.

- Be prepared to initiate Business Continuity Plans in the event of communications failure or facility access interruption.
- Take preventative measures around facilities by storing, securing, or anchoring loose objects, tools, fire extinguishers, etc., which can become airborne during the storm.
- Store extra water, food, and other supplies.
- Fill vehicles and equipment with fuel including any propane tanks at area facilities.
- Ensure site generators have been tested and run, in anticipation of power outages.

5.4.3.6 Post Event

Following a natural disaster, the following actions should be taken as appropriate:

- Care for the injured.
- Do not touch loose or dangling wires. Shut off electrical power if necessary for the safety of personnel, and **if safe to do so**. Shut down generators, if applicable.
- Conduct a “roll call” of company employees and for known contractors/visitors on site. Use company equipment to assist employees or other people in need.
- Perform leak survey, as needed, and perform a pipeline patrol in the affected area to look for damage to ROW or pipelines required within 72 hours unless unsafe or unable to do so.
 - Notify PHMSA if it is unsafe to survey pipeline for damage or leaks.
 - References:



- *CAPTUREPOINT LLC ROW Inspection & Contact Form*
- *CAPTUREPOINT LLC Product Leak and Investigation Report*
- Follow emergency procedures, as prescribed by *Sections 5.1.1 and 5.1.3 & 5.1.5 of this Emergency Response Plan.*

5.4.4 Bomb Threat

The following should be considered:

- Keep caller on the line as long as possible.
- Ask the caller to repeat the message.
- Note characteristics of the caller's voice such as an accent, impediment, pitch, tone, etc.
- Identify background noise that might give a clue to the origin of the caller (e.g., outside, crowded area, etc.).
- Obtain as much information as possible from the caller, including:
 - Location of the bomb.
 - Time of detonation.
 - Appearance or description of the bomb.
 - Reason for planting the bomb.
- Inform the caller that the explosion could result in death or injury.
- Notify appropriate CAPTUREPOINT LLC personnel and emergency responders.
- Shut down operations and/or evacuate all personnel from the area until the bomb threat has been cleared.

5.4.5 Terrorist/Cyber Threat

Reference CAPTUREPOINT LLC O&M Manual, Section 5.3 – Security Threat Levels

5.4.6 Medical Emergency

- Immediately call **911** for public emergency medical services.
- Notify the appropriate CAPTUREPOINT LLC personnel. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan*
- Use “universal precautions” for bloodborne pathogens and infectious materials.
- Only provide the level of aid to which you are trained and qualified.
- Do not move the patient unless the current location is in imminent danger.



5.5 Availability of Personnel, Equipment, Tools & Materials - §195.402(e)(3)

The appropriately qualified supervisor or designee shall conduct an on-site assessment, and shall make available required personnel, equipment, tools, and materials to provide for an expedient response. The assessment and response include, but is not limited to:

- The CAMS Regulatory Compliance Manager, field technician, and others, as appropriate, determine what steps are needed to stop and/or repair the leak or damage.
- The field technician, or designee provide for closure of the nearest automated or manually operated valves, both upstream and downstream of the release site.
- Mobilization of personnel, equipment, and supplies to the affected site.
 - Notify emergency response contractors. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan.*
 - Notify CAPTUREPOINT LLC support personnel.
 - Considerations for equipment and or resources that may be required to facilitate an expedient and safe response.
 - Company identification for entry into impact zone.
 - Special permits for entry into impact zone.
 - Appropriate means of communications, with regards to impact to communications infrastructure.
 - ❖ Cell phones
 - ❖ Two-way radios
 - ❖ Satellite telephones
 - Resources
 - ❖ Emergency call report/log
 - ❖ Emergency Contractors
 - ❖ Operating procedures
 - ❖ Operations forms, as appropriate
 - ❖ Facility/Pipeline startup/shutdown procedures
 - ❖ Emergency Response Plan – Access or Hardcopy
 - ❖ Emergency Contact List
 - ❖ Maps, including but not limited to:
 - ◇ Directions, KMZs, Alignment sheets, Facility/Pipeline drawings, GPS coordinates
 - Safety



- ❖ First Aid Kit
- ❖ Flashlights
- ❖ Protective equipment for rendering first aid
- ❖ Fire Extinguisher
- ❖ PPE – ear plugs, safety glasses, steel toe footwear, gloves, etc.
- Tools/Equipment
 - ❖ Pipe Locator
 - ❖ Probe Bar
 - ❖ Leak detector
 - ❖ Portable generator
 - ❖ Portable air compressor
 - ❖ Specialty tools
 - ◇ Wrenches for valve operations
 - ◇ Bolt cutters
 - ◇ Chainsaw
 - ◇ Axe
 - ◇ Shovel
- Other
 - ❖ Camera
 - ❖ Spare Valve handles
 - ❖ Gauges
 - ❖ Locks and keys
 - ❖ Boats and floatation devices for flooding, with guidance mechanisms.
 - ❖ Notepads and writing utensils.
 - ❖ Rope, chain, straps
 - ❖ Cone and barricade equipment
 - ❖ Tape
 - ◇ Duct
 - ◇ Electrical
 - ◇ Pipe threads
 - ❖ Pipeline markers



- ◇ Stakes
- ◇ Flagging
- ◇ Warning tape
- ◇ Paint
- ❖ Batteries

5.6 Priority of Actions - §195.402(e)(4&5)

Response in order of priority shall be executed, as follows:

- Personal safety.
- Employee, contractors, and public safety.
- Environmental protection.
- Prevent or minimize facility and property damage.
- Maintain continuity of supply (CO₂) or re-establish supply should an interruption occur.
- Assure immediate reporting and investigation of emergencies.

5.7 Emergency Shutdown & Pressure Reduction - §195.402(e)(4)

An emergency shutdown can be accomplished, as follows:

- The Plant (Coffeyville & Panhandle) or Lighthouse (Panhandle) Control Room.
- The CAPTUREPOINT LLC dispatches personnel for field verification and manual valve closures.
- Overpressure protection and pressure relief.
- CAPTUREPOINT LLC emergency response personnel are trained to execute emergency response protocols in a safe, timely manner to minimize the impact to people, property, and the environment. Effective emergency response involves the following steps:
 - Receive and accurately log information on *CAPTUREPOINT LLC Emergency Call Report*.
 - References:
 - ❖ *Section 5.1 of this ERP – Receiving, Identifying & Classifying Notices of Events.*
 - ❖ *Section 5.11 of this ERP – Failure Investigations and Documentation.*
 - ❖ *CAPTUREPOINT LLC Emergency Call Report.*
 - Prompt notifications and response to the incident.
 - Leak classification and determination of appropriate response.
 - Pipeline segment shutdown or pressure reductions, if applicable.



5.7.1 Pipeline Shutdown

When there is a confirmed leak or pipeline damage that poses a threat to people, property, or the environment, the Field Technician or designee has the authority to isolate flow and shut down the pipeline. The pipeline may be shut down for any of the following situations:

- Pipeline rupture, or leak that poses a threat to life, property, or the environment.

5.8 Safely Eliminating an Actual or Potential Hazard

Emergency procedures, as prescribed in this Emergency Response Plan, provide guidelines for safely eliminating an actual or potential hazard to life or property.

- Impacted pipelines shall be checked and determined safe by segment.

5.9 Notifying Fire, Police, & Other Public Officials During an Emergency - §195.402(e)(7)

Local authorities such as fire departments, law enforcement agencies, medical or ambulance services, telephone companies, electric power companies, etc. shall be notified with the expediency warranted by the nature of the emergency. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Manual.*

- A qualified CAPTUREPOINT LLC designee shall:
 - Determine whether a reportable incident exists.
 - Make applicable notifications to external sources to obtain needed assistance and to safeguard employees, the public, and property.
 - Make telephonic notifications to applicable regulatory agencies. *Reference IMMEDIATE NOTIFICATIONS AND EMERGENCY CONTACTS of this Emergency Response Plan.*
 - Make internal notifications, as appropriate.

5.9.1 Notice Requirements

Notifications shall be communicated at the earliest practical moment following discovery of a release of hazardous liquid, but not later than, one hour after confirmed discovery, as follows:

- PHMSA via NRC
- Panhandle via Kansas, Oklahoma and Texas state agencies
- Coffeyville via Kansas and Oklahoma state agencies

5.9.2 Information Required

- Name, address, and Operator Identification Number (OPID) for the CAPTUREPOINT LLC.
- Name and telephone number of the incident reporter.



- Location of the incident.
- Time of the incident.
- Any fatalities or personnel injuries.
- All other significant details that are relevant to the cause of the incident or extent of damage.

Reference CAPTUREPOINT LLC Emergency Call Report

5.9.3 Product Released

The CAMS Regulatory Compliance Manager, or designee, shall calculate and provide a reasonable initial estimate of the amount of product released.

5.9.4 New Information

The CAMS Regulatory Compliance Manager, or designee shall revise or confirm the initial telephonic notice with a revised estimate, if available, within 48 hours of the confirmed discovery of the incident with the following:

- Amount of product released.
- Location of the failure.
- Time of the failure.
- Number of injuries/fatalities.
- Any other relevant information as to the cause of the incident or extent of the damage.
- If no changes to report, The CAMS Regulatory Compliance Manager, or designee shall confirm initial estimates.

5.10 Restoration of Service

Pipeline repairs shall be made in accordance with CAPTUREPOINT LLC specifications, and in accordance with Department of Transportation (DOT). *Reference CAPTUREPOINT LLC O&M Manual, Section 12.19*

The pipeline shall be returned to service ONLY after:

- "AS IS" field conditions are thoroughly documented prior to initiating restoration work
- All repairs are complete.
- The pipeline is tested.
- The pipeline has been surveyed for leaks.
- The Facility/pipeline are monitored during restoration of service.



5.11 Failure Investigations and Documentation

In conjunction with the *CAPTUREPOINT LLC O&M Manual*, this *Emergency Response Plan* establishes and ensures that all operational failures and incidents involving pipeline facilities shall be investigated and analyzed for the purpose of determining the cause and minimizing the potential for hazards and possibility of a recurrence.

- References:
 - *Reference CAPTUREPOINT LLC Failure Investigation Procedure.*
 - *Reference CAPTUREPOINT LLC Failure Investigation Form.*

5.11.1 Securement and Preservation of Information

CAPTUREPOINT LLC shall secure, document, report, and retain, as follows:

- A complete report of all available, pertinent information.
 - Create a timeline of events including actions taken prior to and during the response. The timeline should include who (person or agency) responded and when.
 - Determine if employee actions were impaired: All employees whose actions might have contributed to the failure shall be “post-incident tested” for drugs and alcohol as per the company’s Drug and Alcohol Program.
- Laboratory analysis and/or metallurgical analysis, if applicable.
- Data requested by PHMSA and/or state agencies.
- Sufficient information and data (reportable or non-reportable), including photographs, sketches, measurements, and any other data that may be pertinent, shall be obtained for each failure or incident, as required by 49 CFR 191.
- Key factors evaluated during the failure investigation:
 - Cause of abnormal conditions or event.
 - Qualification of employees or contractors involved.
 - Chain of events leading up to the abnormal situation.
 - Response of pertinent entities after discovery.
 - Forensic Evidence for laboratory examination.
- If applicable, materials that can be utilized in a laboratory analysis to establish the possible cause of the failure or incident. These can include, but are not limited to:
 - Labels for identification.
 - Materials in their existing state so as not to impair analytical value.
 - Labels for equipment orientation, including flow.



- Recovered items prior to testing and investigation (Preserve in “as found” state).
- The laboratory should prepare a full report on the findings of the analysis or examination.
- Information gained by the investigation and analysis of failures or incidents shall be considered and utilized, as appropriate, as soon as possible to prevent a recurrence of failures or incidents from the same cause.

5.11.2 Procedure

Investigation shall proceed, as follows:

- Incident inquiries shall be directed to The CAMS Regulatory Compliance Manager, or designee.
- Ensure applicable personnel are available for assistance with investigation.
- Document the facts; do not jump to conclusions.
- Construct a timeline of events.
- Document surface conditions, weather, and environmental conditions before, during, and after the time of failure.
- Photograph and diagram the location.
 - Photographs from multiple angles, sides, or views.
- Keep a running list of photographs and time/location for future reference.
- Establish a scale (e.g., compared to a ruler, shoe, etc.)
- Interview witnesses.
- Document evidence of any recent soil disturbance, maintenance, natural forces, vandalism.
- Follow chain of custody for all evidentiary material/pieces.
- Secure and make available to regulating and/or investigating agencies, as follows:
 - Incident documentation
 - Response records
 - Investigation reports
- Information gained by the investigation and analysis of failures or incidents should be considered and utilized, as appropriate, as soon as possible to prevent a recurrence of failures or incidents from having the same cause.

5.11.3 Documentation

Secure and retain, as follows:



- Incident investigations using field reports.
- Formal written reports.
- Copies of failure/investigation and summary reports to be retained for the life of the pipeline system.

Forms and reports pertaining to components of the pipeline to be retained for the life of the pipeline.

6 EMERGENCY RESPONSE TRAINING - §195.403(A)

Emergency responders shall maintain a thorough knowledge of emergency response procedures including designated roles and responsibilities. Training shall be documented in the [Enertech Liaison Ensign](#) database. Supervisors responsible for emergency responses will be provided a copy of the emergency response procedures.

Emergency responders shall receive an invitation to training at least once each calendar year, but with intervals not exceeding 15 months, for proper response and procedural application to pipeline emergencies and pipeline incidents.

The Regulatory Compliance Manager, or designee will review and analyze the response. These actions will be compared with the emergency procedures and revised, as necessary.

Emergency Training should include:

- All levels of responsibility and complexity, including personnel from the control center, management, supervision, field personnel, patrol pilots, communications systems, etc.
- Emergency response exercises that include a wide range of activities ranging from tabletop exercises to live drills. The scope of the exercises may vary from a localized emergency to a disaster involving company-wide involvement. These exercises should include a process designed to evaluate the procedures and make changes to improve the operator's response.
- Critiquing the performance of emergency exercises. All simulated and real emergencies should be self-critiqued, with deficiencies identified, recommendations made, and corrective actions taken.
- Items discussed in emergency response training sessions shall include, but are not limited to:
 - Location of the pipelines in relation to public facilities.
 - Location and access to block valves at the receiving facilities.
 - Product type, characteristics, and hazards.
 - Steps necessary to control any accidental release and to minimize the potential of fire, explosions, toxicity, or environmental damage.
 - Appropriate use of portable fire extinguishers and other on-site control equipment.
 - Fire assessment and response.



- Supervisory training and knowledge assessment.
- Communication procedures.
- Capabilities of ambulance services and hospital facilities.
- Mutual assistance services.
- Maps indicating the line, block valves, and other pertinent information.
- Responsibility and resources of any federal, state, or local organizations.
- Records of training courses, rosters, and safety meetings shall be secured and retained.
- Recognition of conditions that are likely to cause emergencies, predict the consequences of malfunction or failures, and take appropriate actions.
- Activity reviews for previous emergencies to determine whether the procedures were effective and/or needed further discussion.

7 LIAISON WITH STAKEHOLDER AUDIENCE

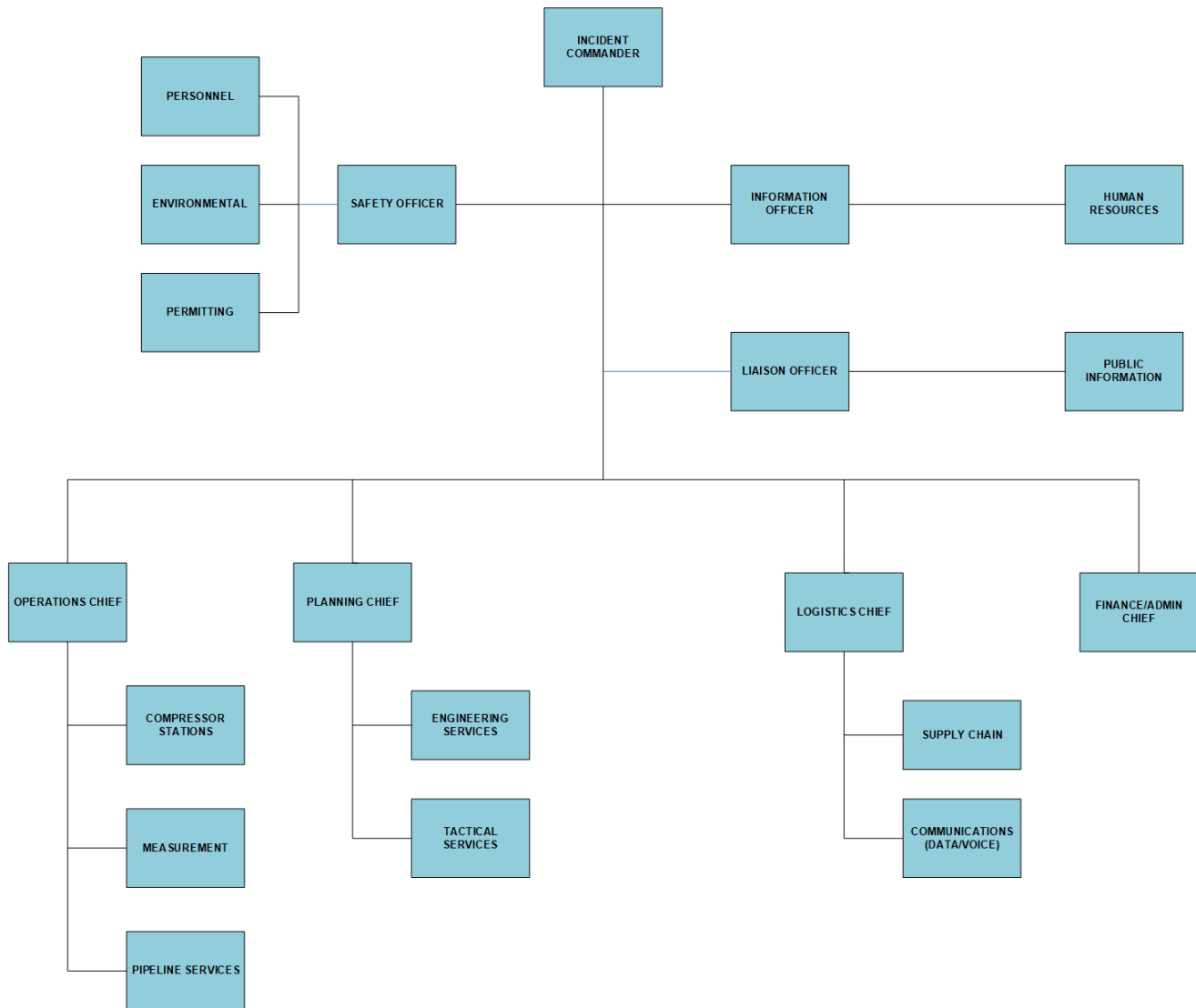
Field technicians and designees shall establish and maintain public relations with the general public, local officials, emergency responders, law enforcement, contractors and other stakeholders as appropriate, to ensure an effective response capability for pipeline emergencies and to designate roles and responsibilities for each responding entity.

- Training sessions may be scheduled with stakeholders to demonstrate proper procedures and to develop an effective working rapport for pipeline emergency response.
- Records of all communications, meetings, or training sessions with governmental and emergency response agencies for pipeline emergency response shall be documented and retained.
 - References:
 - *CAPTUREPOINT LLC Training Roster & Liaison with Stakeholders Form.*
 - *CAPTUREPOINT LLC Public Awareness Manual, Section 13.*

7.1 INCIDENT COMMAND

The incident command system is a standardized approach to the command, control, and coordination of emergency response providing a common hierarchy for responders from multiple disciplines.

7.2 Team Structure Model



7.3 Guidelines to Team Structure Model

The Incident Command Model shall be used as a guideline depending on the size and severity of the incident. Very small Incidents may only have an incident commander, whereas a very large Incident may breakdown into other subsections under the officers and chiefs of each section. Each position shall be deployed on an as-needed basis.

7.4 Designated First Responder and/or Incident Commander

A CAPTUREPOINT LLC designee shall be qualified to serve as a first responder, and secondly, as a first option to serve as an Incident commander. CAPTUREPOINT LLC reserves the right to designate an Incident commander to better serve the organization's rights and interests depending on the Incident.



7.5 Pre-Incident Preparation

- CAPTUREPOINT LLC shall establish and conduct a continuing training program to instruct emergency response personnel to carry out emergency procedures.
- CAPTUREPOINT LLC shall put in place conditions to safeguard mission critical documents, drawings, files, vendors list and provide for quick accessibility.
- CAPTUREPOINT LLC shall maintain an updated contact list for support/resources and local emergency responders.

7.6 Recovery Implementation

- Deploy incident command structure and activate core team members, as appropriate.
- Conduct an incident assessment.
 - Establish communication capabilities and a timeline for restoration.
 - Determine power capabilities and availability (commercial, backup, portable).
 - Understand materials and supplies availability and accessibility.
 - Determine contractor availability and accessibility.
 - Perform a damage assessment and restoration timelines.
 - Perform an internal employee impact and needs assessment.
 - Understand internal resources availability.
 - Set-up area access restrictions.
 - Perform a security needs assessment.
 - Determine the personal and public safety impact and/or exposure.
 - Determine the environmental impact and/or exposure.
 - Determine the regulatory impact and/or exposure.
- Strategize and develop a work plan for recovery process. Prioritize in accordance with the:
 - Impact on restoration services.
 - Resource availability.
 - Identified potential hazards.
 - Known assumptions.
- Establish daily briefings and periodic meeting schedule.
- Utilize visual aids, including but not limited to:
 - Incident command structure.
 - Work plans.



- Work prioritization.
 - Work progress/status.
 - Maps and drawings.
 - Valve status.
- Maintain front-line decision-making process.

7.7 Recovery Process

- Restore safety culture as first priority.
- Establish a location specific safety plan.
- Secure impact area and work areas.
- Prioritize restoration process.
- Deploy internal and external support resources.
 - Safety
 - Environmental
 - Regulatory
 - Permitting
 - Contractors
 - Equipment providers
 - Technical support
- Provide work aids, tools, and equipment.
- Redirect daily operations, as necessary.
- Address community impact issues.
- Perform periodic damage assessments and progress reports.
- Execute documentation process.

7.8 Post Incident Activity

- Secure all records, reports, documentation.
- Debrief Incident recovery process.
- References:
 - *CAPTUREPOINT LLC Failure Investigation Procedure.*
 - *CAPTUREPOINT LLC Failure Investigation Form.*