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Enhancing Execution with Experience™

North Dakota Public Service Commission

Supplemental Information Documents

In support of an application for a

Certificate of Site Compatibility

Hiland Partners Holdings LLC

Roosevelt Gas Plant Expansion Project

Prepared by:
E3 Environmental, LLC

July 2018

Hiland Partners Holdings LLC
a Kinder Morgan company

Kinder Morgan, via its wholly owned subsidiary, Hiland Partners Holdings LLC (HILAND) has prepared an application for a Certificate of Site Compatibility for the Roosevelt Gas Plant Expansion Project. In support of this application, HILAND submits the attached supplemental information documents. Attachments 3 and 5 have been prepared for the existing Roosevelt Gas Plant and will be revised to incorporate the expansion activities as appropriate.

Attachments:

Attachment 1: Corporate Documents

Attachment 2: Construction Drawings/Best Management Practices

Attachment 3: Spill Prevention Control and Countermeasures Plan

Attachment 4: Erosion Control Plan

Attachment 5: Risk Management Plan

Attachment 6: State and County Permits

Attachment 1: Corporate Documents

State of North Dakota

SECRETARY OF STATE

CERTIFICATE OF GOOD STANDING
OF

HILAND PARTNERS HOLDINGS LLC

The undersigned, as Secretary of State of the State of North Dakota, hereby certifies that HILAND PARTNERS HOLDINGS LLC, a FOREIGN LIMITED LIABILITY COMPANY, authorized to transact business in the State of North Dakota on August 24, 2011, and according to the records of this office as of this date, has paid all fees due this office as required by North Dakota statutes governing a FOREIGN LIMITED LIABILITY COMPANY.

ACCORDINGLY the undersigned, as such Secretary of State, and by virtue of the authority vested in him by law, hereby issues this Certificate of Good Standing to

HILAND PARTNERS HOLDINGS LLC

Issued: July 10, 2018

Alvin A. Jaeger
Secretary of State

RECEIVED

DEC 21 2004

SEC. OF STATE

FOREIGN LIMITED PARTNERSHIP REGISTRATION

SECRETARY OF STATE
SFN 7936W (7936 + 7974) (10-03)

FOR OFFICE USE ONLY

ID Number	20,513,900 FLP
WO Number	177618
Filed	1-5-05
By:	NS

SEE REVERSE SIDE FOR FEES, FILING AND MAILING

1.A. The registration MUST be accompanied by ALL of the following
- Filing fee of $100
- Current, certificate verifying identity, existence, and status of a foreign limited partnership certified by the government officer of the state or country under the laws of which it is organized
- Signed Consent of Registered Agent and fee of $10

B. The following MAY be required:
- Signed consent to use of name and fee of $10
- Fictitious Name Certificate and fee of $25
- Fees and registrations to register general partners (SEE INSTRUCTION 14)

TYPE OR PRINT LEGIBLY Provisions regarding foreign limited partnerships are found in North Dakota Century Code, Section 45-10 1-52.

2. Name of the limited partnership EXACTLY as it appears on certificate from state of origin: Hiland Partners, LP

3 Federal ID #: [redacted]

4 If applicable, provide the fictitious name and complete the Partnership Fictitious Name Certificate form if the selected fictitious name is not already registered in North Dakota Only provide the fictitious name in this line if,
a) The limited partnership name is not in the form as required of limited partnerships in North Dakota
b) The Secretary of State has notified the limited partnership that its name is the same as or deceptively similar to a name already registered, and the limited partnership is unable to obtain consent to use of name from the previous filer or a certified copy of a final decree of a court of competent jurisdiction establishing prior right of this limited partnership to use of the name in North Dakota.
c) The limited partnership does not wish to use or protect its name in North Dakota and chooses to use a name other than its limited partnership name

Hiland Energy, LP

5. State of Origin:	6. EXACT date of formation (month, day AND year)	7 Telephone #.	8 Toll-free telephone #
Delaware	10-18-04	(508) 242-6040	

9. Nature of business or activities the limited partnership intends to conduct in North Dakota:
gathering, compressing and dehydrating gas products and water injection services

10. Name of required registered agent In North Dakota: (SEE INSTRUCTION 10)	11. Social Security/Federal ID # of registered agent.
C T Corporation System	

12 Complete address of registered agent In North Dakota which may not only be a post office box: (Street/RR, PO Box if applicable, City, State, Zip+4)
314 East Thayer Avenue, Bismarck, North Dakota 58501-4018

13 Complete address of the principal office which may not only be a post office box (Street/RR, PO Box if applicable, City, State, Zip+4)
205 West Maple, Suite 1100, Enid, Oklahoma 73701

14. The general partners, their Social Security/Federal ID #, and the addresses of their principal places of business (If needed, attach a sheet to add names of additional general partners)

NAME	SOCIAL SECURITY/ FEDERAL ID #	COMPLETE ADDRESS Street/RR	PO Box	City	State	Zip+4
Hiland Partners GP, LLC	71-0972722	205 West Maple, Suite 1100, Enid, OK 73701				
20513800						

15 The complete address of the office at which a list of the names and addresses of the limited partners is kept, their capital contributions, and an undertaking by the foreign limited partnership to keep the list until the Foreign Limited Partnership Registration is withdrawn or canceled: (Street/RR, PO Box if applicable, City, State, Zip+4)
205 West Maple, Suite 1100, Enid, Oklahoma 73701

16 The Secretary of State is appointed the agent of the foreign limited partnership for service of process if the agent's authority is revoked or if the agent cannot be found or served with the exercise of reasonable diligence

"I , a general partner, have read the foregoing registration, know the contents thereof, and believe the statements made thereon to be true "

Signature	Date
Randy Moeder, CEO & President of the General Partner (Manager)	December 15, 2004
Signature:	Date:

17. Name of person to contact about this report.	E-Mail Address	Daytime telephone # and extension, if any
Stephanie Allison	[redacted]	[redacted]

REGISTERED AGENT CONSENT TO SERVE

SECRETARY OF STATE
SFN 7974 (10-03)

RECEIVED
DEC 21 2004
SEC. OF STATE

FOR OFFICE USE ONLY

ID#:	20,513,900
WO#:	177618
Filed: 1-5-05	By: NS

SEE REVERSE SIDE FOR FILING AND MAILING INSTRUCTIONS

1. FILING FEE: $10.00

TYPE OR PRINT LEGIBLY

2. Name of the organization for which the registered agent is to serve (corporation, limited liability company, limited liability partnership, limited partnership, limited liability limited partnership or real estate investment trust):

Hiland Partners, LP

3. Name of the registered agent:

CT Corporation System

4. Registered agent is (Check one)

- ☐ An individual North Dakota resident
- ☒ A corporation
- ☐ A limited liability company
- ☐ A limited liability partnership

5. Federal ID # or social security # of registered agent:

[redacted]

6. According to state law, the newly appointed registered agent must sign a statement of consent to serve in that capacity (see instruction number 6 for authorized signers).

"The undersigned, as the newly appointed registered agent for the organization named in number 2, consents to act as the registered agent for this organization until a change or resignation is submitted to the Secretary of State according to the provisions of North Dakota state law."

Signature of Registered Agent: Victor Alfano

Date: 12/20/04

VICTOR ALFANO
ASSISTANT SECRETARY

CT
a Wolters Kluwer business

CT
111 Eighth Avenue
New York, NY 10011

212 894 8940 tel
212 590 9180 fax
www.ctlegalsolutions.com

November 16, 2010

Clara M. Jenkins
Director, Business Systems & Programs
Office of the Secretary of State
600 East Boulevard Avenue, Dept. 108
Bismarck, North Dakota 58505-0500

Re: Change of Address for C T Corporation System (A Commercial Registered Agent)

Dear Ms. Jenkins:

Please change the address of **C T Corporation System**, a commercial registered agent, to the following:

314 East Thayer Avenue

Bismarck ND 58501

As always, thank you for your kind assistance.

Very truly yours,

Kenneth Uva

Vice President

NORTH DAKOTA
Filed 11-18 2010
Secretary of State

AMENDED CERTIFICATE OF AUTHORITY OF FOREIGN LIMITED PARTNERSHIP OR FOREIGN LIMITED LIABILITY LIMITED PARTNERSHIP

SECRETARY OF STATE
SFN 53808 (07-2008)

FOR OFFICE USE ONLY

ID#:	20,513,900
WO#:	767903
Filed: 8-24-11	By: mDH

RECEIVED
AUG 08 2011
SEC. OF STATE

SEE REVERSE SIDE FOR FEES, FILING AND MAILING INSTRUCTIONS

A. The application MUST be accompanied by ALL of the following:
- Filing fee of $40
- If amending the name, a current Certificate of Fact verifying the name change certified by the government officer of the state or country under the laws of which it is orgainzed.

B. The following MAY be required:
- Signed consent to use of name and fee of $10
- Fictitious Name Certificate and fee of $25

TYPE OR PRINT LEGIBLY

For reference, see North Dakota Century Code, Section 45-10.2-81

2. This application applies to (check the ☐ that defines the type of partnership)
☑ Limited partnership ☐ Limited Liability Limited Partnership

3. Reason for Amended Certificate of Authority
☐ Partnership name change ☑ Other amendment

4. Federal ID Number [redacted]

5. Name of limited partnership or limited liability limited partnership EXACTLY as currently registered with the North Dakota Secretary of State
Hiland Partners, LP

6. Name of limited partnership or limited liability limited partnership as amended EXACTLY as it appears on Certificate of Fact from state or country of origin
MDH

7. If applicable, provide the fictitious name and complete the Partnership Fictitious Name Certificate form if the selected fictitious name is not already registered in North Dakota. Only provide the fictitious name in this line if:
a) The "new" limited partnership or limited liability limited partnership name is not in the form as required of limited partnerships or limited liability limited partnerships in North Dakota.
b) The Secretary of State has notified the limited partnership or limited liability limited partnership that its "new" name is the same as or deceptively similar to a name already registered, and the limited partnership or limited liability limited partnership is unable to obtain consent to use of name from the previous filer or a certified copy of a decree of a court of competent jurisdiction establishing prior right of this limited partnership or limited liability limited partnership to use of the name in North Dakota.
c) The limited partnership or limited liability limited partnership does not wish to use or protect its "new" name in North Dakota and chooses to use a name other than its limited partnership or limited liability limited partnership name.

8. State or Country of Origin	9. Telephone Number	10. Toll-Free Telephone Number
DE	(580) 242-6040	

11. Nature of business or activities the limited partnership or limited liability limited partnership intends to conduct in North Dakota
Gathering, compressing and dehydrating gas products and water injection services.

12.A. Name of **commercial** registered agent in North Dakota
CT Corporation Systems

OR

12.B. Name of **noncommercial** registered agent in North Dakota

12.C. Address of **noncommercial** registered agent in North Dakota: (Street/RR, PO Box, City, State, Zip+4) **May not be only a post office box.**

13. Complete address of the principal office which may not only be a post office box: (Street/RR, PO Box if applicable, City, State, Zip+4)
205 W. Maple, Suite 1100 Enid, OK 73701

14. The general partners, their Social Security/Federal ID #, and the addresses of their principal places of business: (If needed, attach a sheet to add names of additional general partners)

NAME	SOCIAL SECURITY/ FEDERAL ID #	COMPLETE ADDRESS Street/RR	PO Box	City	State	Zip+4
Hiland Partners GP Holdings, LLC	76-0828230	205 W. Maple Suite 1100		Enid	OK	73701

15. "The undersigned, a general partner of the limited partnership or limited liability limited partnership, has read the foregoing application, knows the contents thereof, and believes the statements made thereon to be true. I further authorize the Secretary of State to correct numbers 5, 6, 8, 12A and 12B if not correctly reflected."

Signature Matthew S. Harrison Date 8/2/2011

16. Name of person to contact about this document
Matthew S. Harrison

E-Mail Address [redacted]

Daytime telephone Number and extension, if any [redacted]

CERTIFICATE OF AUTHORITY FOREIGN LIMITED LIABILITY COMPANY APPLICATION

SECRETARY OF STATE
SFN 19381 (10-2012)

RECEIVED
APR 17 2015
Sec. of State

FOR OFFICE USE ONLY

System ID Number	20,513,910 FLC
WO Number	1274673
Filed	4-17-15 By TT

1. The application is accompanied by the following:
   - [X] *Filing fee of $135
   - [X] *Current CERTIFICATE OF GOOD STANDING or CERTIFICATE OF EXISTENCE duly authenticated by the organizing officer of the state or country of organization
   - [ ] Certification of professional license
   - [ ] Signed Consent to Use Business Name and fee of $10
   - [ ] Trade Name Registration and fee of $25

SEE INSTRUCTIONS FOR FEES, FILING AND MAILING INFORMATION

TYPE OR PRINT LEGIBLY — For reference, see North Dakota Century Code Sections 10-31-01, 10-31-13.1 and 10-32-138.

2. Type of Limited Liability Company Applying for Certificate of Authority (check one)
   [X] Foreign Business [ ] Foreign Professional

3. Federal ID Number [redacted]

4. Name of Limited Liability Company EXACTLY as it appears on Certificate of Good Standing from State or Country of Origin
   Hiland Partners Holdings LLC

5. If applicable, provide the trade name and complete the Trade Name Registration form if selected trade name is not already registered in North Dakota. Only provide the trade name in this line if:
   a) The limited liability company name is not in the form as required of limited liability companies in North Dakota.
   b) The Secretary of State has notified the limited liability company that its name is the same or deceptively similar to a name already registered, and the limited liability company is unable to obtain Consent to Use Business Name from the previous filer or a certified copy of a final decree of a court of competent jurisdiction establishing prior right of this limited liability company to use of the name in North Dakota.
   c) The limited liability company does not wish to use or protect its name in North Dakota and chooses to use a name other than its limited liability company name.

6. Complete Address of Principal Executive Office (Street/RR, PO Box, City, State, ZIP+4) which may not be only a post office box
   1001 Louisiana Street, Suite 1000, Houston, Texas 77002

7. State or Country Where Organized
   Delaware

8. Limited Liability Company Will Expire in State or Country of Origin (check one)
   [X] Perpetual [ ] Expires - Specify Date (mm/dd/yyyy):

9. Telephone Number
   713-369-9000

10. Toll-free Telephone Number

11A. Name of Commercial Registered Agent in North Dakota
   C T Corporation System

OR

11B. Name of Noncommercial Registered Agent in North Dakota

11C. Address of Noncommercial Registered Agent in North Dakota (Street/RR, PO Box, City, State, ZIP+4) **May not be only a post office box.**

12. Nature of Business or Activities the Limited Liability Company Intends to Conduct in North Dakota
   Own and operate midstream natural gas systems

13. **MANAGERS AND GOVERNORS OF THE LIMITED LIABILITY COMPANY**

MANAGERS	Check box if Manager also serves as Governor	COMPLETE MAILING ADDRESS Street/RR	PO Box	City	State	ZIP+4
	[ ]					
	[ ]					
	[ ]					
	[ ]					
MANAGING MEMBER Kinder Morgan, Inc.		1001 Louisiana Street, Suite 1000, Houston, Texas 77002				
MANAGING MEMBER						

If needed, attach sheet to add names of additional managers or governors.

14. "The undersigned has read the foregoing application, knows the contents, and believes the statements to be true. I further authorize the Secretary of State to correct numbers 4, 7, 11A, 11B, and 11C if not correctly reflected. I understand that if I make a false statement in this document, I may be subject to criminal penalties."

Signature		Date
	Richard E. McCord, Asst. Sec'y	April 14, 2015
15. Name of Person to Contact about this Document: Marcia D. West	Email Address: [redacted]	Daytime Telephone Number and Extension, if any: [redacted]

COMMERCIAL OR NONCOMMERCIAL REGISTERED AGENT/OFFICE STATEMENT OF CHANGE

SECRETARY OF STATE
SFN 13019 (11-2016)

For Office Use Only	
ID Number:	20513900
WO Number:	555918
Filed: 8.24.17	By: AS

ONLY complete this form and send payment if:

- Appointing an alternate registered agent (commercial or noncommercial);
- Reflecting a name change of a noncommercial registered agent; or
- Reflecting an address change of a noncommercial registered agent.

RECEIVED
AUG 14 2017
SEC. OF STATE

1. FILING FEE: $10.00

NO FEE: To change the address resulting from a postal reassignment, rezoning, or 911 address implementation.

TYPE OR PRINT LEGIBLY

SEE INSTRUCTIONS ON PAGES 2 AND 3.

For reference, see North Dakota Century Code Chapter 10-01.1.

2. Name of organization changing registered agent/office: (cooperative association, corporation, limited liability company, limited liability partnership, limited partnership, limited liability limited partnership, or real estate investment trust)	3. Federal ID number
HILAND PARTNERS HOLDINGS LLC	

4A. Name of commercial registered agent in North Dakota	OR	4B. Name of noncommercial registered agent in North Dakota (or new name of current noncommercial registered agent)
Capitol Corporate Services, Inc.		

4C. Consent of the newly appointed registered agent has been obtained:

☒ Yes ☐ No (Naming a party as registered agent without prior consent may result in involuntary termination or revocation of the organization. See instructions.) ☐ Agent not changing

5A. New address of noncommercial registered agent name in number 4B (It cannot be only a post office box. It must include the noncommercial registered agent's physical address in North Dakota.) If applicable for mailing purposes, a post office box can be added to the physical address.

Physical address	PO box	
City	State	ZIP code

5B. Change of address is result of: (check one)

☐ Appointment of a new commercial or noncommercial registered agent

☐ New location for current noncommercial registered agent

☐ Postal reassignment, rezoning, or implementation of 911 address

5C. Is the address in number 5A the same address as the principal place of business for the organization named in number 2?

☐ Yes ☐ No

6. If a new commercial registered agent or a new noncommercial registered agent has been named in number 4A or 4B, an officer, manager, or other individual authorized by the organization named in number 2 may sign this statement. If only the address of the current noncommercial registered agent is changing or the noncommercial registered agent has changed its name, then the noncommercial registered agent may sign the statement.

"As required by state law, I certify that:

- The new commercial registered agent or new noncommercial registered agent named in number 4A or 4B, if applicable, was appointed by a resolution as required by state law, and was adopted by the governing structure of the organization named in number 2;
- Consent has been obtained from the newly appointed commercial or noncommercial registered agent;
- The new address in number 5A, if applicable, for the current or newly appointed noncommercial registered agent is the same address where the noncommercial registered agent can be located during normal business hours;
- The undersigned has read the foregoing statements, knows the contents thereof and believes the same to be true;
- The undersigned is authorized to sign the statement; and
- The Secretary of State is authorized to correct numbers 2, 4A, 4B, and 5A if not correctly reflected, and I understand that if I make a false statement in the document, I may be subject to criminal penalties."

Signature		Date
Brian Radecki	Brian Radecki, Attorney-in-Fact	08/10/2017

7. Name of person to contact about this document	Email address	Daytime telephone number
Myra Simmons	[redacted]	[redacted]

State of North Dakota

SECRETARY OF STATE

CERTIFICATE OF CONVERSION OF

HILAND PARTNERS, LP

The undersigned, as Secretary of State of the State of North Dakota, hereby certifies that a Statement of Conversion of HILAND PARTNERS, LP, a Delaware Limited Partnership into

HILAND PARTNERS HOLDINGS LLC

a Delaware Limited Liability Company duly signed and verified pursuant to North Dakota statutes governing conversions, have been received in this office and are found to conform to law.

ACCORDINGLY the undersigned, as such Secretary of State, and by virtue of the authority vested in him by law, hereby issues this Certificate of Conversion of HILAND PARTNERS, LP into

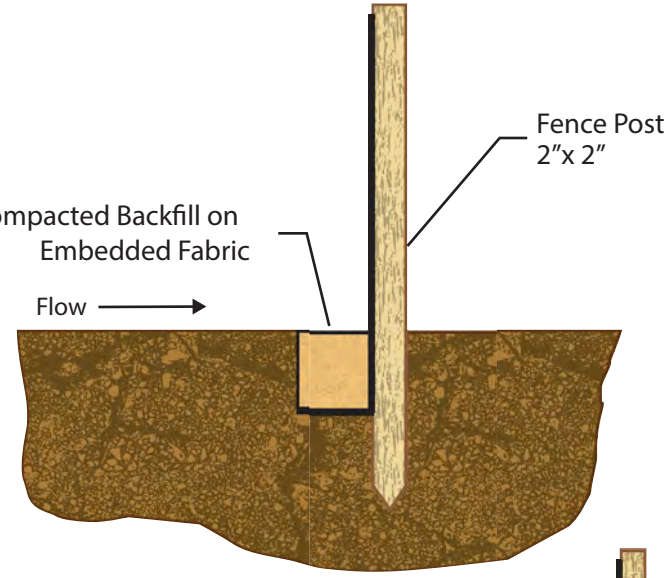
HILAND PARTNERS HOLDINGS LLC

Effective date of conversion: July 17, 2015
Issue date: July 17, 2015

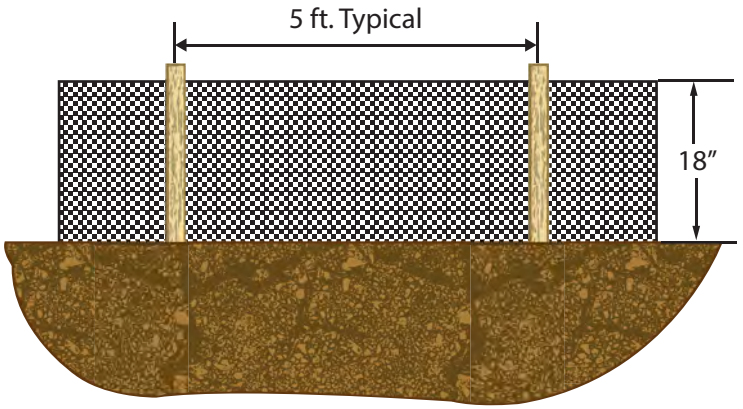
Alvin A. Jaeger
Secretary of State

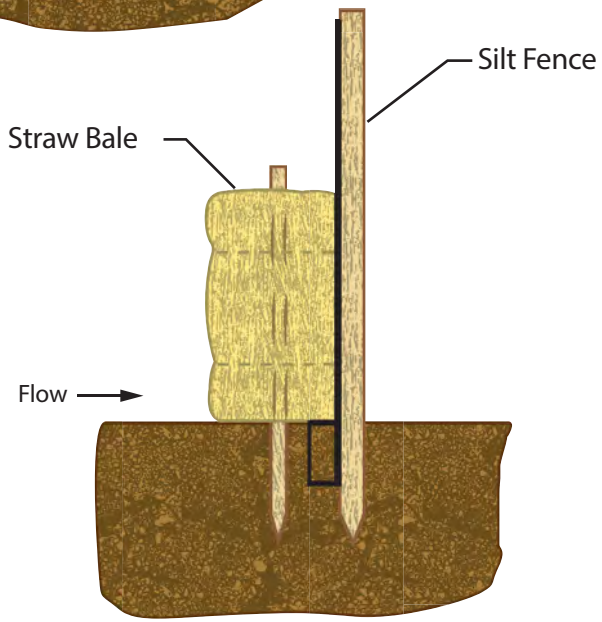
Attachment 2: Construction Drawings/Best Management Practices

Construction Drawings including plant plot plans are under development and will be provided once complete.

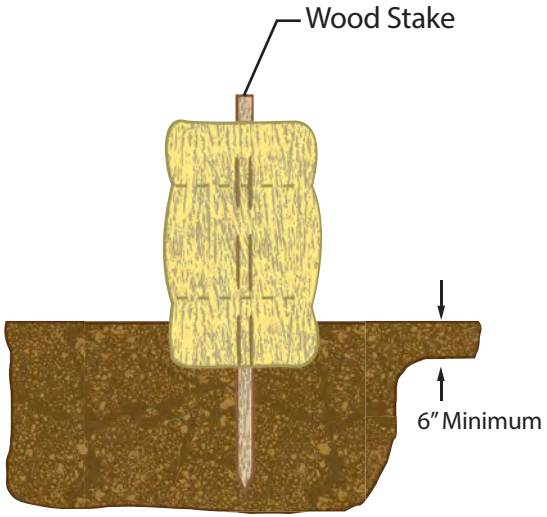


Straw/Hay Bales & Silt Fence





Straw/Hay Bales & Silt Fence



Straw/Hay Bales Only

For environmental review purposes only.

E3 Environmental™
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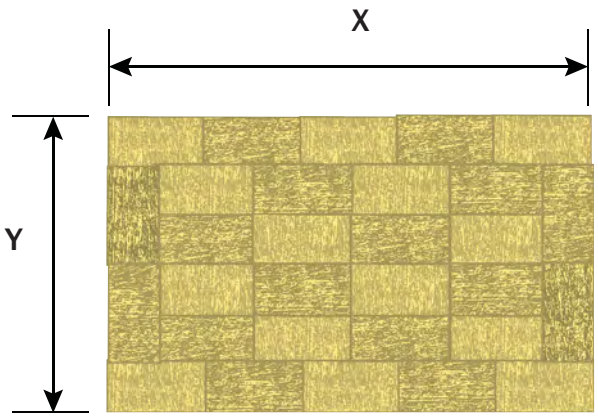
Standard Best Management Practices

Typical Silt Fence Installation and Hay Bale Figure

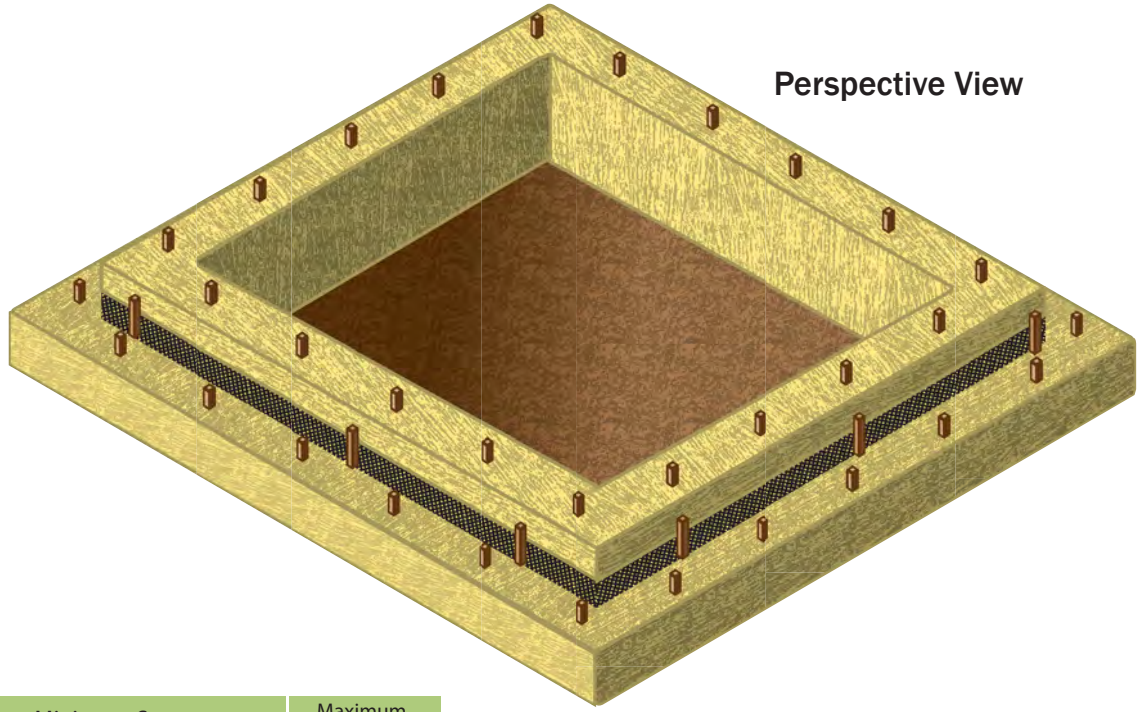
Date: 12/27/2011

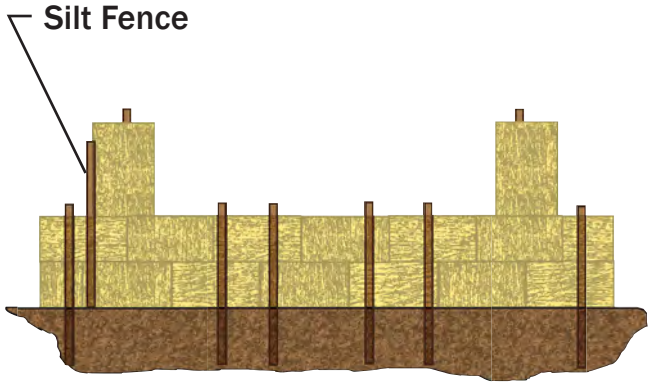
Revised: 12/27/2011



1. Arrange the straw bales to the X and Y dimensions specified below.

2. If bottom of structure is not lined with straw bales (Option 1), line entire structure with geotextile filter fabric.





Minimum Structure Dimensions (ft.)		Maximum Pumping Rate (gal./min.)
X	Y	
10	20	300
15	20	350
20	20	400
20	25	450
25	25	500
25	30	550
30	30	660

For environmental review purposes only.

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Standard Best Management Practices

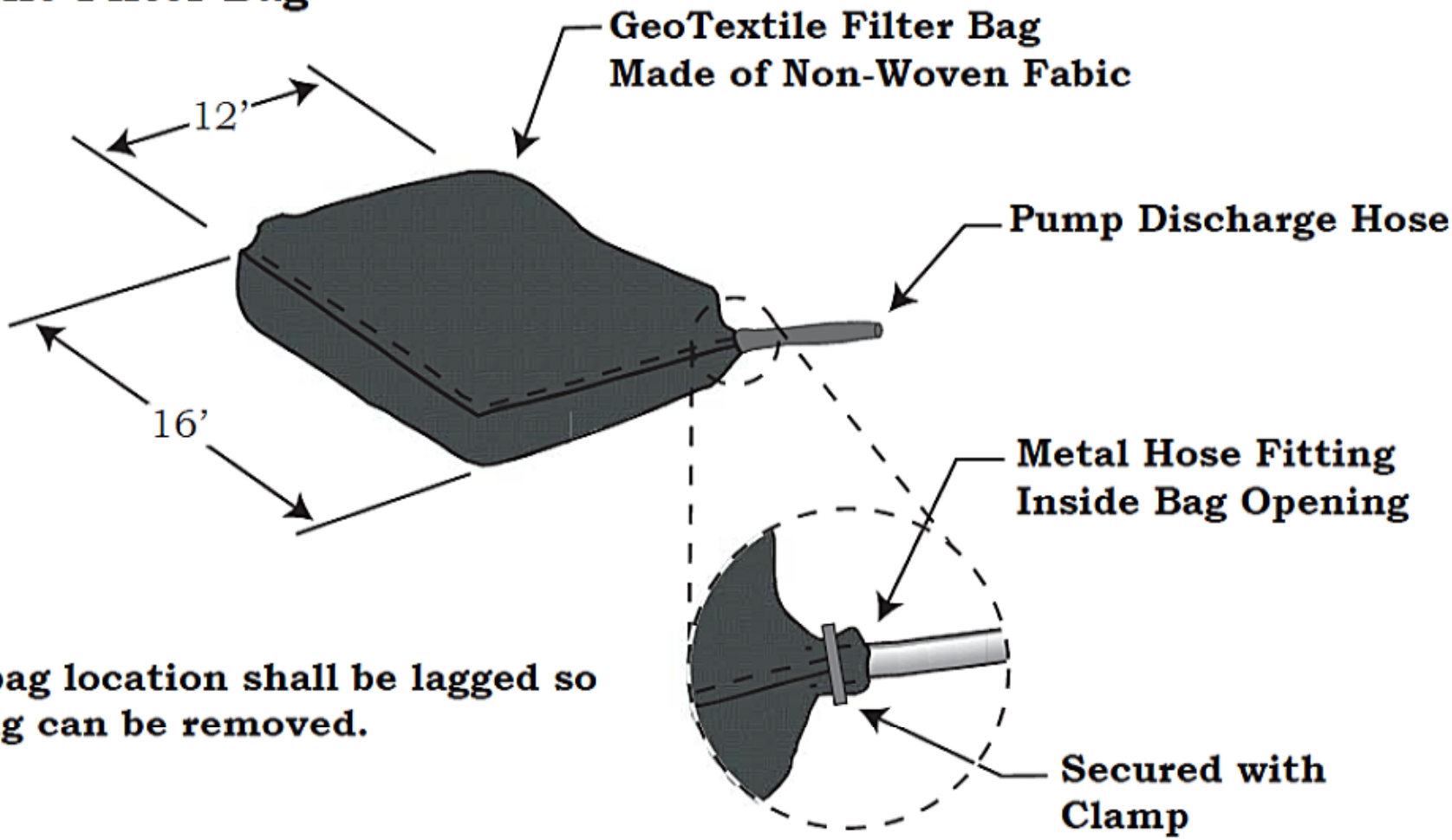
Straw Bale Dewatering Structure

Figure

Date: 12/27/2011

Revised: 7/16/2012

GeoTextile Filter Bag



Note:

1. **Filter bag location shall be lagged so that bag can be removed.**

For environmental review purposes only.

E3 ENVIRONMENTAL™
Enhancing Execution with Experience®

Typical Water Discharge BMPs

Attachment 3: Spill Prevention Control and Countermeasures Plan

2219 Sawdust Road #601 • The Woodlands, Texas 77380 USA • Tel: 281-955-9600 • Fax: 281-955-0369 • info@trpcorp.com • www.emergency-response-planning.com

Roosevelt Gas Plant

SPCC

Plan Last Revised: 04/07/2016

Developed by:

TECHNICAL RESPONSE PLANNING

2219 Sawdust Road #601 • The Woodlands, Texas 77380 USA • Tel: 281-955-9600 • Fax : 281-955-0369 • info@trpcorp.com • www.emergency-response-planning.com

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TABLE OF CONTENTS, CONTINUED

DEFINITIONS

[40 CFR §112.2]

For the purposes of this part:

Adverse weather means weather conditions that make it difficult for response equipment and personnel to clean up or remove spilled oil, and that must be considered when identifying response systems and equipment in a response plan for the applicable operating environment. Factors to consider include significant wave height as specified in appendix E to this part (as appropriate), ice conditions, temperatures, weather-related visibility, and currents within the area in which the systems or equipment is intended to function.

Alteration means any work on a container involving cutting, burning, welding, or heating operations that changes the physical dimensions or configuration of the container.

Animal fat means a non-petroleum oil, fat, or grease of animal, fish, or marine mammal origin.

Breakout tank means a container used to relieve surges in an oil pipeline system or to receive and store oil transported by a pipeline for reinjection and continued transportation by pipeline.

Bulk storage container means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.

Bunkered tank means a container constructed or placed in the ground by cutting the earth and re-covering the container in a manner that breaks the surrounding natural grade, or that lies above grade, and is covered with earth, sand, gravel, asphalt, or other material. A bunkered tank is considered an aboveground storage container for purposes of this part.

Completely buried tank means any container completely below grade and covered with earth, sand, gravel, asphalt, or other material. Containers in vaults, bunkered tanks, or partially buried tanks are considered aboveground storage containers for purposes of this part.

Complex means a facility possessing a combination of transportation-related and non-transportation-related components that is subject to the jurisdiction of more than one Federal agency under section 311(j) of the CWA.

Contiguous zone means the zone established by the United States under Article 24 of the Convention of the Territorial Sea and Contiguous Zone, that is contiguous to the territorial sea and that extends nine miles seaward from the outer limit of the territorial area.

Contract or other approved means means:

(1) A written contractual agreement with an oil spill removal organization that identifies and ensures the availability of the necessary personnel and equipment within appropriate response times; and/or

(2) A written certification by the owner or operator that the necessary personnel and equipment resources, owned or operated by the facility owner or operator, are available to respond to a discharge within appropriate response times; and/or

(3) Active membership in a local or regional oil spill removal organization that has identified and ensures adequate access through such membership to necessary personnel and equipment to respond to a discharge within appropriate response times in the specified geographic area; and/or

(4) Any other specific arrangement approved by the Regional Administrator upon request of the owner or operator.

Discharge includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying, or dumping of oil, but excludes discharges in compliance with a permit under section 402 of the CWA; discharges resulting from circumstances identified, reviewed, and made a part of the public record with respect to a permit issued or modified under section 402 of the CWA, and subject to a condition in such permit; or continuous or anticipated intermittent discharges from a point source, identified in a permit or permit application under section 402 of the CWA, that are caused by events occurring within the scope of relevant operating or treatment systems. For purposes of this part, the term discharge shall not include any discharge of oil that is authorized by a permit issued under section 13 of the River and Harbor Act of 1899 (33 U.S.C. 407).

Facility means any mobile or fixed, onshore or offshore building, property, parcel, lease, structure, installation, equipment, pipe, or pipeline (other than a vessel or a public vessel) used in oil well drilling operations, oil production, oil refining, oil storage, oil gathering, oil processing, oil transfer, oil distribution, and oil waste treatment, or in which oil is used, as described in appendix A to this part. The boundaries of a facility depend on several site-specific factors, including but not limited to, the ownership or operation of buildings, structures, and equipment on the same site and types of activity at the site. Contiguous or non-contiguous buildings, properties, parcels, leases, structures, installations, pipes, or pipelines under the ownership or operation of the same person may be considered separate facilities. Only this definition governs whether a facility is subject to this part.

Farm means a facility on a tract of land devoted to the production of crops or raising of animals, including fish, which produced and sold, or normally would have produced and sold, $1,000 or more of agricultural products during a year.

Fish and wildlife and sensitive environments means areas that may be identified by their legal designation or by evaluations of Area Committees (for planning) or members of the Federal On-Scene Coordinator's spill response structure (during responses). These areas may include wetlands, National and State parks, critical habitats for endangered or threatened species, wilderness and natural resource areas, marine sanctuaries and estuarine reserves, conservation areas, preserves, wildlife areas, wildlife refuges, wild and scenic rivers, recreational areas, national forests, Federal and State lands that are research national areas, heritage program areas, land trust areas, and historical and archaeological sites and parks. These areas may also include unique habitats such as aquaculture sites and agricultural surface water intakes, bird nesting areas, critical biological resource areas, designated migratory routes, and designated seasonal habitats.

Injury means a measurable adverse change, either long- or short-term, in the chemical or physical quality or the viability of a natural resource resulting either directly or indirectly from exposure to a discharge, or exposure to a product of reactions resulting from a discharge.

Loading/unloading rack means a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.

Maximum extent practicable means within the limitations used to determine oil spill planning resources and response times for on-water recovery, shoreline protection, and cleanup for worst case discharges from onshore non-transportation-related facilities in adverse weather. It includes the planned capability to respond to a worst case discharge in adverse weather, as contained in a response plan that meets the requirements in § 112.20 or in a specific plan approved by the Regional Administrator.

Mobile refueler means a bulk storage container onboard a vehicle or towed, that is designed or used solely to store and transport fuel for transfer into or from an aircraft, motor vehicle, locomotive, vessel, ground service equipment, or other oil storage container.

Motive power container means any onboard bulk storage container used primarily to power the movement of a motor vehicle, or ancillary onboard oil-filled operational equipment. An onboard bulk storage container which is used to store or transfer oil for further distribution is not a motive power container. The definition of motive power container does not include oil drilling or workover equipment, including rigs.

Navigable waters of the United States means “navigable waters” as defined in section 502(7) of the FWPCA, and includes:

(1) All navigable waters of the United States, as defined in judicial decisions prior to passage of the 1972 Amendments to the FWPCA (Pub. L. 92-500), and tributaries of such waters;

(2) Interstate waters;

(3) Intrastate lakes, rivers, and streams which are utilized by interstate travelers for recreational or other purposes; and

(4) Intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold in interstate commerce.

Non-petroleum oil means oil of any kind that is not petroleum-based, including but not limited to: Fats, oils, and greases of animal, fish, or marine mammal origin; and vegetable oils, including oils from seeds, nuts, fruits, and kernels.

Offshore facility means any facility of any kind (other than a vessel or public vessel) located in, on, or under any of the navigable waters of the United States, and any facility of any kind that is subject to the jurisdiction of the United States and is located in, on, or under any other waters.

Oil means oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

Oil-filled operational equipment means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g. , those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.

Oil Spill Removal Organization means an entity that provides oil spill response resources, and includes any for-profit or not-for-profit contractor, cooperative, or in-house response resources that have been established in a geographic area to provide required response resources.

Onshore facility means any facility of any kind located in, on, or under any land within the United States, other than submerged lands.

Owner or operator means any person owning or operating an onshore facility or an offshore facility, and in the case of any abandoned offshore facility, the person who owned or operated or maintained the facility immediately prior to such abandonment.

Partially buried tank means a storage container that is partially inserted or constructed in the ground, but not entirely below grade, and not completely covered with earth, sand, gravel, asphalt, or other material. A partially buried tank is considered an aboveground storage container for purposes of this part.

Permanently closed means any container or facility for which:

(1) All liquid and sludge has been removed from each container and connecting line; and

(2) All connecting lines and piping have been disconnected from the container and blanked off, all valves (except for ventilation valves) have been closed and locked, and conspicuous signs have been posted on each container stating that it is a permanently closed container and noting the date of closure.

Person includes an individual, firm, corporation, association, or partnership.

Petroleum oil means petroleum in any form, including but not limited to crude oil, fuel oil, mineral oil, sludge, oil refuse, and refined products.

Produced water container means a storage container at an oil production facility used to store the produced water after initial oil/water separation, and prior to reinjection, beneficial reuse, discharge, or transfer for disposal.

Production facility means all structures (including but not limited to wells, platforms, or storage facilities), piping (including but not limited to flowlines or intra-facility gathering lines), or equipment (including but not limited to workover equipment, separation equipment, or auxiliary non-transportation-related equipment) used in the production, extraction, recovery, lifting, stabilization, separation or treating of oil (including condensate), or associated storage or measurement, and is located in an oil or gas field, at a facility. This definition governs whether such structures, piping, or equipment are subject to a specific section of this part.

Regional Administrator means the Regional Administrator of the Environmental Protection Agency, in and for the Region in which the facility is located.

Repair means any work necessary to maintain or restore a container to a condition suitable for safe operation, other than that necessary for ordinary, day-to-day maintenance to maintain the functional integrity of the container and that does not weaken the container.

Spill Prevention, Control, and Countermeasure Plan; SPCC Plan, or Plan means the document required by § 112.3 that details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate countermeasures to a discharge. Storage capacity of a container means the shell capacity of the container. Transportation-related and non-transportation-related , as applied to an onshore or offshore facility, are defined in the Memorandum of Understanding between the Secretary of Transportation and the Administrator of the Environmental Protection Agency, dated November 24, 1971, (appendix A of this part).

United States means the States, the District of Columbia, the Commonwealth of Puerto Rico, the Commonwealth of the Northern Mariana Islands, Guam, American Samoa, the U.S. Virgin Islands, and the Pacific Island Governments.

Vegetable oil means a non-petroleum oil or fat of vegetable origin, including but not limited to oils and fats derived from plant seeds, nuts, fruits, and kernels.

Vessel means every description of watercraft or other artificial contrivance used, or capable of being used, as a means of transportation on water, other than a public vessel.

Wetlands means those areas that are inundated or saturated by surface or groundwater at a frequency or duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include playa lakes, swamps, marshes, bogs, and similar areas such as sloughs, prairie potholes, wet meadows, prairie river overflows, mudflats, and natural ponds.

Worst case discharge for an onshore non-transportation-related facility means the largest foreseeable discharge in adverse weather conditions as determined using the worksheets in appendix D to this part.

[67 FR 47140, July 17, 2002, as amended at 71 FR 77290, Dec. 26, 2006; 73 FR 71943, Nov. 26, 2008; 73 FR 74300, Dec. 5, 2008]

REGULATORY CROSS REFERENCE TABLE

[40 CFR §112.7; §112.7(a)(1)&(5)]

This SPCC plan is organized in a manner designed to allow efficient use during an emergency as well as demonstrate this facility's conformance with the requirements listed 40 CFR §112. This Regulatory Cross Reference Table may be used to identify the location of applicable regulatory requirements within this Plan as listed by regulatory citation.

SPCC RULE CITATION	DESCRIPTION OF RULE	PLAN SECTION(S)
§112.1	General Applicability and Scope	
(b)	General Applicability	1.0
(d)	Exemptions	1.0, 3.2.2
(e)	Statement of Compliance with other applicable laws	1.0, 4.5, 5.8
§112.2	Definitions	Preface
§112.3	Requirement to Prepare and Implement SPCC Plan	
(a)	Applicability	1.0
(d)(1)	Professional Engineer Certification	2.1, 2.2
(d)(2)	Owner/Operator Requirement to Implement	2.3
(e)	Plan Availability	1.0
§112.4	Amendment of Plan by EPA Regional Administrator	
(a)	EPA Discharge Notification	2.5.1, 4.3
(b)-(f)	Amendment of Plan by EPA Regional Administrator	2.5.2
§112.5	Amendment of the SPCC Plan	
(a)	Facility Changes	2.6.1
(b)	5 Year Review	2.6.2
(c)	P.E. Certification of Technical Amendments	2.6.1
§112.7	General requirements for SPCC Plans	1.0, 2.3
(a)(1)	Conformance with 40 CFR §112	1.0
(a)(2)	Deviations and Equivalent Environmental Protection	Preface
(a)(3)	Facility Physical Description and Diagram	3.0, Figure 3-1, Figure 3-2
(a)(3)(i)	Facility Oil Storage	3.2.2, Table 3-1 - Oil Storage
(a)(3)(ii)	Discharge Prevention Measures	3.2.3, 5.6
(a)(3)(iii)	Discharge/Drainage Controls	3.2.4, 5.2, Tables 3-1 & 3-2
(a)(3)(iv)	Spill Countermeasures	4.1
(a)(3)(v)	Disposal of Recovered Materials	4.1
(a)(3)(vi)	Contact List and Spill Notification	4.2, Preface
(a)(4)	Discharge Reporting Procedures	4.2
(a)(5)	SPCC Plan Organization for Discharge Response	Preface
(b)	Reasonable potential for equipment failure	5.1
(c)	Secondary Containment and Diversionary Structures	Table 3-2, 5.2
(d)	Secondary Containment Impracticability	5.2
(e)	Inspections, tests, and record keeping	5.3, 5.11.6
(f)	Personnel Training and Discharge Prevention Procedures	
(f)(1)	Personnel Instruction	5.4.1, 5.4.3
(f)(2)	Designated Person Accountable for Spill Prevention	5.4.2
(f)(3)	Annual Spill Briefing	5.4.3

[40 CFR §112.7; §112.7(a)(1)&(5)] (Continued)

SPCC RULE CITATION	DESCRIPTION OF RULE	PLAN SECTION(S)
(g)	Security (excluding oil production facilities)	5.5
(h)	Loading/unloading (excluding offshore facilities)	5.6
(i)	Brittle fracture evaluation requirements	5.7
(j)	Conformance with State and local requirements	1.0, 4.5, 5.8
(k)	Qualified Oil-filled operational Equipment	5.9
§112.8	Requirements for onshore facilities (excluding production facilities)	
(a)	General and specific requirements	1.0
(b)	Facility drainage	
(b)(1)	Restrain Drainage from Diked Storage Areas	5.10.1
(b)(2)	Valves Used on Diked Storage Areas	5.10.2
(b)(3)	Facility Drainage Systems from Undiked Storage Areas	5.10.3
(b)(4)	Final Discharge of Drainage	5.10.4
(b)(5)	Facility Drainage for Multiple Unit Treatment Systems	5.10.5
(c)	Bulk Storage Containers	
(c)(1)	Tank Compatibility with its Contents	5.11.1
(c)(2)	Diked Area Construction and Containment Volume for Storage Tanks	5.11.2
(c)(3)	Drainage of Rainwater from Diked Areas	5.11.3
(c)(4)	Corrosion Protection of Buried Metallic Storage Tanks	5.11.4
(c)(5)	Corrosion Protection of Partially Buried Metallic Storage Tanks	5.11.5
(c)(6)	Above Ground Tank Inspections	5.3, 5.11.6
(c)(7)	Control Leakage through Internal Heating Coils	5.11.7
(c)(8)	Engineered Overfill Prevention Features	5.11.8
(c)(9)	Observation of Effluent Treatment Facilities	5.11.9
(c)(10)	Visible Oil Leak Corrections	5.11.10
(c)(11)	Appropriate Position of Mobile or Portable Oil Storage Containers	5.11.11
(d)	Facility transfer operations, pumping, and facility process	
(d)(1)	Buried Piping Installation, Protection and Inspection	5.12.1
(d)(2)	Not-in-Service and Standby Service Terminal Connections	5.12.2
(d)(3)	Pipe Support Design	5.12.3
(d)(4)	Aboveground Valve and Pipeline Examination	5.12.4
(d)(5)	Aboveground Piping Protection from Vehicular Traffic	5.12.5
§112.20	Certification of Substantial Harm Determination	2.4, 5.13

DEVIATIONS AND EQUIVALENT ENVIRONMENTAL PROTECTION

SPCC RULE CITATION	SUMMARY OF DEVIATION AND EQUIVALENT PROTECTION	PLAN SECTION(S)
§112.8 (c)(6)	Requirement: Test or inspect each above ground container for integrity on regular schedule in accordance with industry standards. The Steel Tank Institute (STI) industry standard SP001 for low-risk tanks with 5,001 to 30,000 gallon capacities meeting the containment and construction criteria established in the standard for "Category 1" require detailed external examination by a licensed inspector once every 20 years. Deviation: Low-risk Category 1 tanks with 5,001 to 30,000 gallon capacity will undergo annual detailed external examinations by trained oil-handling facility personnel in lieu of certified inspections occurring on a 20 year cycle. Tank T-1 and T-2 are 16,800 gallon tanks with double-walled construction that will utilize Annual Visual Inspections in lieu of formal integrity testing required by STI SP001. Equivalent Protection: Annual inspections on these low-risk tanks by trained oil-handling personnel that work with the tanks on a regular basis provides adequate inspection to identify potential problems so that significant releases can be prevented.	5.3, 5.11.6 & Table 3-1

SPCC EMERGENCY CONTACT INFORMATION

* 24-hour number

SPCC Emergency Contact Information	
Primary Notifications:	
Agency Notifications:	
North Dakota Industrial Commission	701-328-8020 (Office)
North Dakota Department of Health	701-328-5210 (Office)
North Dakota Department of Emergency Services	800-472-2121 (Office)
McKenzie County Disaster Emergency Services	701-580-6936 (Office)
National Response Center (NRC) *Notification of NRC does not constitute notice to the state	800-424-8802* (Office) Reportable Spill Notification+
National Emergency Spill Response Contractors:	
Clean Harbors (Formerly Safety-Kleen)	800-645-8265* (Office)
GHD FIRST (Formerly CRA)	866-812-9565* (Office)
OMI Environmental Solutions (Oil Mop)	800-645-6671* (Office)

SUMMARY OF SPCC ACTIVITIES

Periodically, the maintenance of this SPCC Plan includes inspection of oil storage tanks and equipment, training of facility personnel, and record keeping. These actions are summarized below, with certain activities requiring documentation as noted below and within the SPCC Plan. For any questions regarding this SPCC document or changes, contact the EHS Department for assistance.

Activity	Frequency	SPCC Plan Reference
Spill Notification: Contact Gas Control to issue an Emergency Response Line (ERL) Notification	In the event of a spill or release	Page vii; Section 4.0
Containment Draining: Document secondary containment drainage for discharges to the ground or watercourse.	As required after rain events	Sections 5.11.3 & 6.0
Plan Review by Management	Every 5 years	Section 2.6.2
Periodic Visual Inspection: using Periodic SPCC Inspection Checklist in plan or equivalent	As noted in Table 3-1	Table 3-1 & Sections 5.3.1 & 6.0
Tank Integrity Testing: For tanks identified in this plan as requiring integrity testing according an industry standard.	As Noted in opsInfo	Table 3-1 & Section 5.3.2
Annual Visual Inspections: For tanks using Annual Visual Inspections in lieu of Integrity Testing, document using the Annual Inspection Checklist in plan or equivalent	Annually	Table 3-1 & Sections 5.3.2 & 6.0
Training: Provide SPCC Refresher training for oil-handling employees.	Annually	Section 5.4
Training: Provide Site Specific Plan review and Spill Briefing during a regularly scheduled safety meeting	Annually	Section 5.4
Record Retention: Inspection, training and other records must be maintained for 3 years	On-going	Section 5.3.5
Facility Changes: Immediately notify EHS of changes to facility storage tanks or secondary containment, such as tank additions, changes, removals, or repairs.	On-going	Sections 2.6.1 & 6.0

SECTION 1

Last Revised:

1.0 GENERAL APPLICABILITY AND SCOPE

1.1 Applicability and Scope

1.1 APPLICABILITY AND SCOPE

[40 CFR §112.1(b); 112.3(a)&(e); 112.7(a)(1)&(2)]

As required by Federal and State oil storage, transfer, and spill removal regulations, this Spill Prevention, Control, and Countermeasure Plan (SPCC Plan or Plan) has been prepared and implemented in accordance with the following provisions:

- **Federal Spill Prevention, Control, and Countermeasure (SPCC) Requirements** (40 CFR §112) - Oil Pollution Prevention at non-transportation related facilities meeting the following criteria:
  - Due to its location, could reasonably be expected to discharge oil in quantities that may be harmful into or upon the navigable waters of the United States or adjoining shorelines; and
  - Having a completely buried storage capacity in excess of 42,000 gallons of oil, excluding the capacity of a completely buried tank and connected underground piping, underground ancillary equipment, and containment systems, that is currently subject to all of the technical requirements of 40 CFR 280 or all of the technical requirements of a State program approved under part 281 (Underground Storage Tank regulations); or
  - Having an aggregate aboveground oil storage capacity in excess of 1,320 gallons, excluding containers with a capacity less than 55 gallons.
- **Other Applicable Requirements** - All applicable State Specific and Local Requirements are incorporated into this Plan as necessary.
- **Deviations from the Requirements** - All deviations from applicable requirements are summarized on page vii of this Plan.

The intended purpose of this SPCC Plan is to manage potential sources of oil releases, preclude a release to the environment, and outline appropriate initial responses in the event of an oil spill which could threaten human health or the environment. Although this Plan is consistent with federal requirements for SPCC Plans, the existence of this Plan for this facility does not necessarily reflect the determination that an SPCC Plan is required under federal law for this facility. The Plan for this facility may be established as a result of internal evaluations of appropriate facility management unrelated to federal requirements. In addition, the facility is a transportation-related onshore facility because it is part of an *"[i]nterstate and intrastate onshore and offshore pipeline systems including pumps and appurtenances related thereto as well as in-line or breakout storage tanks needed for the continuous operation of a pipeline system, and pipelines from onshore and offshore oil production facilities,"* as defined in 40 CFR 112.2 and Appendix A to Part 112-Memorandum of Understanding between the Secretary of Transportation and the Administrator of the Environmental Protection Agency. As such, this facility may contain compressor engines and other equipment that are part of and appurtenances to the pipeline system. While this equipment may store oil, the equipment and associated oil are transportation-related onshore facilities within DOT jurisdiction and not subject to the SPCC requirements and may therefore not be included in this plan. Any DOT jurisdictional equipment shown in this plan is shown only for reference.

A complete copy of this SPCC Plan is maintained at the facility, if the facility is normally attended at least four hours per day, or otherwise at the nearest regional field office and will be available to the EPA Regional Administrator for onsite review during normal working hours.

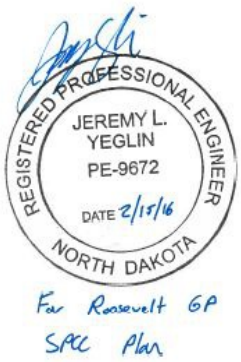
SECTION 2

Last Revised: April 7, 2016

2.0 CERTIFICATION AND REVIEWS

2.1 PROFESSIONAL ENGINEER CERTIFICATION

[40 CFR §112.3(d)(1)(i)]

40 CFR, Part 112.3(d) Professional Engineer Certification	
Being familiar with the provisions of 40 CFR, Part 112, I attest to the following: • I am familiar with the requirements of this part • I or my agent has visited and examined the Facility • The Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of this part • Procedures for required inspections and testing have been established • The Plan is adequate for the Facility	
Printed Name of Registered Professional Engineer:	Jeremy L. Yeglin
Signature of Registered Professional Engineer:	
Date:	2/15/2016
Registration No.:	PE-9672 (North Dakota)
Seal:  For Roosevelt GP SPCC Plan	

Note: When Applicable, Certification is conditional pending satisfactory resolution of the required improvements listed in Section 2.1.1. Applicable: No

2.1.1 Certification Conditions

Rule Citation	Discrepancy	Remedy	Required Due Date	Date Completed / Completed By

2.2 DECLARATION OF THE AGENT FOR THE PROFESSIONAL ENGINEER

[40 CFR §112.3(d)(1)(ii)]

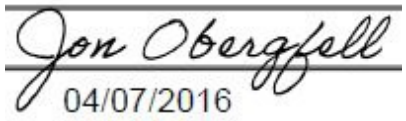
"I hereby certify that being familiar with provisions of the SPCC rules (40 CFR §112), I served as an agent for the Professional Engineer certifying this SPCC Plan by visiting the site, examining the facility, and providing technical details of the site layout and features, including but not limited to secondary containment construction details and dimensions."

2.3 MANAGEMENT COMMITMENT CERTIFICATION

[40 CFR §112.3(d)(2); §112.7; §112.7(d)(2)]

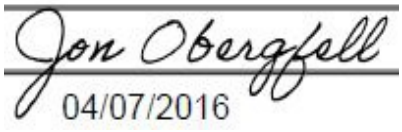
Management is committed to the implementation of the procedures outlined in this SPCC Plan and the prevention of releases of oil to navigable waters of the United States and the environment. Management understands that certification of this Plan by the Professional Engineer in no way relieves the owner or operator of this facility of the duty to prepare and fully implement this Plan in accordance with provisions of the SPCC rules (40 CFR §112). This SPCC Plan is approved by the management personnel below at a level of authority to commit the necessary resources to fully implement the Plan, including the commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

"I hereby attest that I am familiar with the requirements outlined in this plan and am committed to dedicating any and all resources necessary to implement all provisions of this SPCC Plan."

Name:	Jon Obergfell	**Signature:**	
Title:	Operations Supervisor	**Date:**	4/7/2016

2.4 CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION

[40 CFR §112.20; Appendix C, Attachment C-II]

Facility distance to navigable water; mark the appropriate line.			
0-1/4 ☑	1/4-1/2 mile ☐	1/2 - 1 mile ☐	> 1 mile ☐
APPLICABILITY OF SUBSTANTIAL HARM CRITERIA			
Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?			
YES ☐ NO ☑			
Does the facility have a total oil storage capacity greater than or equal to one million gallons and, within any storage area, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation?			
YES ☐ NO ☑			
Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the appropriate formula in or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?			
YES ☐ NO ☑			
Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (using the appropriate formula in or a comparable formula) such that a discharge from the facility would shut down a drinking water intake?			
YES ☐ NO ☑			
Does the facility have a total oil storage capacity greater than or equal to one million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?			
YES ☐ NO ☑			
CERTIFICATION			
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete.			
Signature: 		Date: 4/7/2016	
Name: Jon Obergfell		Title: Operations Supervisor	

2.5 AMENDMENT OF PLAN BY EPA REGIONAL ADMINISTRATOR

2.5.1 EPA Discharge Notification

[40 CFR §112.4(a)]

In the event of a release of any kind, implement the ERL System (Section 4.2) to determine if the release is immediately reportable to State or Federal Agencies. The EPA requires notification of the Regional Administrator for any release or discharge of oil, in any form, from this facility directly or indirectly into or upon the navigable waters of the United States or its adjoining shorelines with more than:

- 1,000-gallons in a single discharge, or
- 42-gallons in each of two or more discharges occurring within any consecutive 12-month period

Contact EHS to document the discharge details for submittal to the EPA's Regional Administrator (RA) within sixty-days (60) of the spill event. Use the "EPA Release Notification Form," available in the Section 6 or an equivalent form to ensure that all required information is reported to the EPA Regional Administrator. All spills meeting the criteria above shall be recorded on the Reportable Spill History Log included in Section 6 of this Plan.

2.5.2 Amendment of Plan by EPA Regional Administrator

[40 CFR §112.4(b)-(f)]

This section only applies in the event of a release of oil as described above. A copy of the information submitted to the EPA Regional Administrator will also be supplied to all applicable local and state agencies for their review. The EPA Regional Administrator will review comments from the local and state agencies and decide if amendments to this plan are required. The company will have 30 days to either comply with the required amendments to the plan or to provide a written appeal in accordance with 40 CFR § 112.4.

2.6 SPCC REVIEWS AND AMENDMENTS

2.6.1 Facility Changes and Amendments

[40 CFR §112.5(a)&(c)]

In accordance with SPCC regulations, the owner or operator of a facility must *"Amend the SPCC Plan for your facility in accordance with the general requirements in § 112.7, and with any specific section of this part applicable to your facility, when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in § 112.1(b)."* To this end, all facility modifications shall be reviewed to determine the modification's impact on the facility's potential for a discharge and required amendments to this Plan. This Plan will be reviewed periodically for changes to ensure continued compliance. Any changes identified can be documented utilizing the *Facility Change Form* in Section 6 of this plan and submitted to EHS Representative for the facility, who will determine if an amendment to the Plan is required. If an amendment is required, the EHS Representative will determine if the amendment is technical or administrative.

Technical amendments, such as changes to the facility's design, operation, or maintenance that *materially affect* the potential for an oil spill or release at the facility, will require a PE review and certification as soon as possible but within six (6) months after any changes are made at the facility.

Technical amendments include, but are not limited to:

- Adding, replacing, or removing of tanks
- Reconstruction, replacement, or installation of piping systems
- Construction, alteration, or demolition of secondary containment
- Modifications of testing, inspection, and maintenance procedures

Administrative amendments, such as changes to the facility's personnel or contact information that *does not materially affect* the potential for an oil spill or release at the facility, will not require a PE review and certification.

Administrative amendments can be made as necessary and include, but are not limited to:

- Changes or updates to facility personnel or contact information
- Changes to training materials
- Other non-technical text changes

Any amendments made to the Plan will be implemented as soon as possible but not later than six (6) months following the preparation of the amendment. All amendments to the Plan will be recorded in Table 2-1: *SPCC Plan Amendment Log*.

Plan review for identification of facility changes under this section will be conducted at a frequency that will allow identification of changes and preparation of Plan amendments prior to the 6 month deadline. Periodic review schedule and documentation of completion are maintained in the company's opsInfo compliance software system.

2.6.2 Five Year Review

[40 CFR §112.5(b)]

In addition to conducting periodic Plan reviews to identify required amendments due to facility changes, SPCC regulations require that the entire Plan be reviewed and evaluated at least once every 5 years to identify more effective prevention and control technologies. The plan must be amended if the review identifies new field proven, prevention and control technologies that will significantly reduce the likelihood of a discharge as described in 40 CFR §112.1(b). The amendment must be issued within 6 months of the review and the amendment must be implemented as soon as possible, but not later than 6 months after issuance.

The first review shall be completed within 5 years of the certification date shown is Section 2.1 of this plan. Documentation of this review is captured in Table 2-2 as well as in the company's opsInfo compliance tracking software system. Any identified Plan Amendments shall be recorded on Table 2-1.

Table 2-1 - SPCC Plan Amendment Log

Date of Amendment	General Description of Change Made[1]	Page Numbers of Changes	Name of Re-Certifying PE[2]	Name of Person Completing Amendment
2/15/2016	SPCC | 2.0 Certification and Reviews | 2.1 Professional Engineer Certification			
4/6/2016	SPCC | 5.0 Prevention Methods Provided | 5.12 Facility Transfer Operations | 5.12.4 Aboveground Valve and Pipeline Examination			
4/6/2016	SPCC | 5.0 Prevention Methods Provided | 5.11 Bulk Storage Tanks/Secondary Containment | 5.11.2 Diked Area Construction and Containment Volume for Storage Tanks			
4/7/2016	SPCC | 2.0 Certification and Reviews | 2.3 Management Commitment Certification			
4/7/2016	SPCC | 2.0 Certification and Reviews | 2.4 Certification of Substantial Harm Determination			

[1] Note whether the change(s) are technical amendment, administrative amendment. Technical changes will require a PE re-certification. See Section 2.6 for additional information on amendment requirements to this SPCC Plan.

[2] Non-technical or administrative changes do not require a PE certification.

Table 2-2 - SPCC Plan 5 Year Review Log

Date of Review	Representative, Name and Title[3]	Signature	SPCC Plan Review Finding (Select One)

[3] Representative conducting 5 year review should be familiar with SPCC regulations, the facility and applicable prevention and control technologies. For further details on the 5 year review, please see section 2.6.2 of this document.

SECTION 3

Last Revised:

3.0 FACILITY INFORMATION

3.1 FACILITY LOCATION INFORMATION

[40 CFR §112.7(a)(3)]

Facility Name:	Roosevelt Gas Plant
Facility Location:	Co Rd 34 Watford City, ND 58854 47.68959 ° ' " N / -103.269977 ° ' " W Facility Location is shown on Figure 3-1 Site Location Map
Driving Directions to Watford City, ND:	Travel west approximately 1 mile on County Road 34 toward US-85 S. Travel north for 5 miles on US-85 N. Turn right on to ND-23 for approximately 1 mile. Travel north on Main Street for 2.5 miles to Watford City, ND.
Facility Owner / Operator:	Hiland Partners Holdings, LLC 1001 Louisiana St. Houston, TX 77002

3.2 FACILITY DESCRIPTION

[40 CFR Part 112.7(a) (3)]

The Roosevelt Gas Plant is a natural gas extraction and fractionation station used to create saleable natural gas. The facility of approximately 36 acres consists of natural gas transmission, extraction, and fractionation related equipment such as compressors, meters, dehydrators, separators, process equipment, loadouts, and ASTs; which includes storage facilities for oil as defined in 40 CFR § 112.2.

3.2.1 Proximity to Navigable Waters

[40 CFR §109.5(b)(1)]

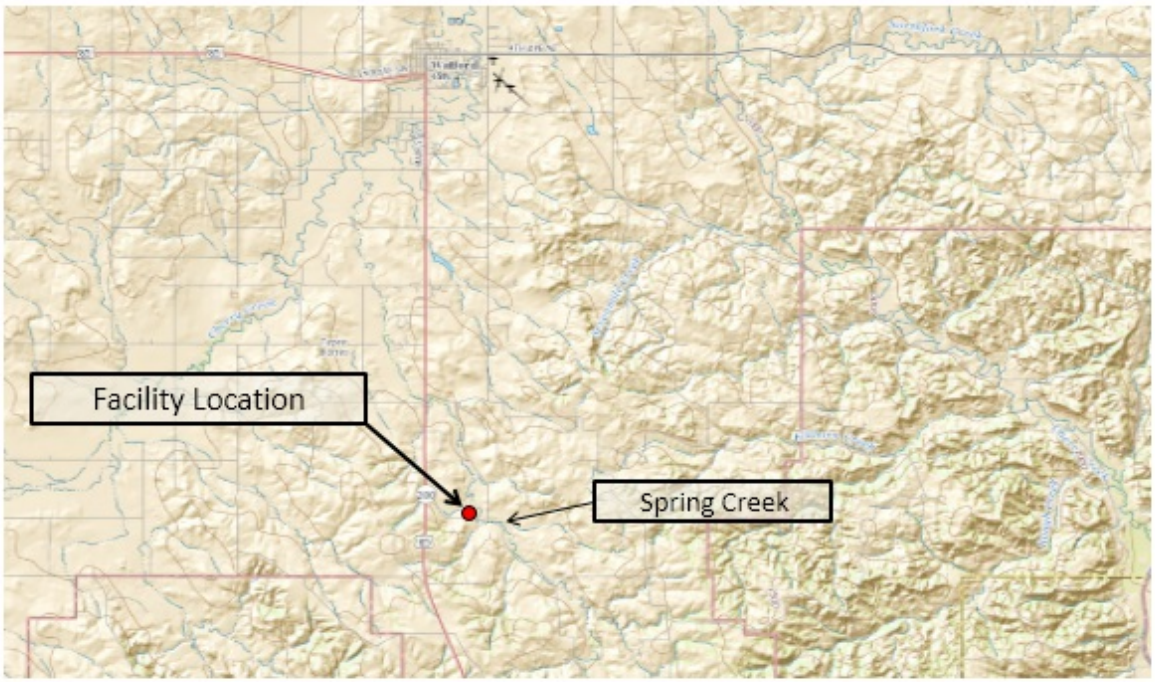
The closest navigable water body to the facility as identified on Figure 3-1 Site Location Map is Spring Creek. Spring Creek is located approximately 200 feet northeast of the facility. Surface drainage at the facility is governed by surface topography and the general direction of surface drainage is identified in Figure 3-2 Facility Diagram as north. Surface flows after the facility will drain into a tributary of Spring Creek and flow approximately ¼ mile northeast until entering Spring Creek.

3.2.2 Location Map

[40 CFR §112.7; §112.7(a)(3)]

This location map shows the location of facility in relation to nearest population center as well as the nearest navigable waterways and pertinent topographic details that may be required to contain any releases from the facility prior to impacting the navigable water body.

FIGURE 3-1 - SITE LOCATION MAP



SOURCE: USGS NOT TO SCALE

Golder Associates

CLIENT: Hiland Partners Holdings, LLC
FACILITY: Roosevelt Gas Plant
TITLE: Site Location Map

McKenzie, ND T149N, R98W,S30, SW1/4SE1/4	DRAWN: JMH	CHECKED: JSK	REVIEWED: RSM	DATE: 1-28-16	REV: 0	PROJECT NO.: 1531507	FIGURE: 3-1

3.2.3 Facility Diagram

[40 CFR §112.7(a)(3)]

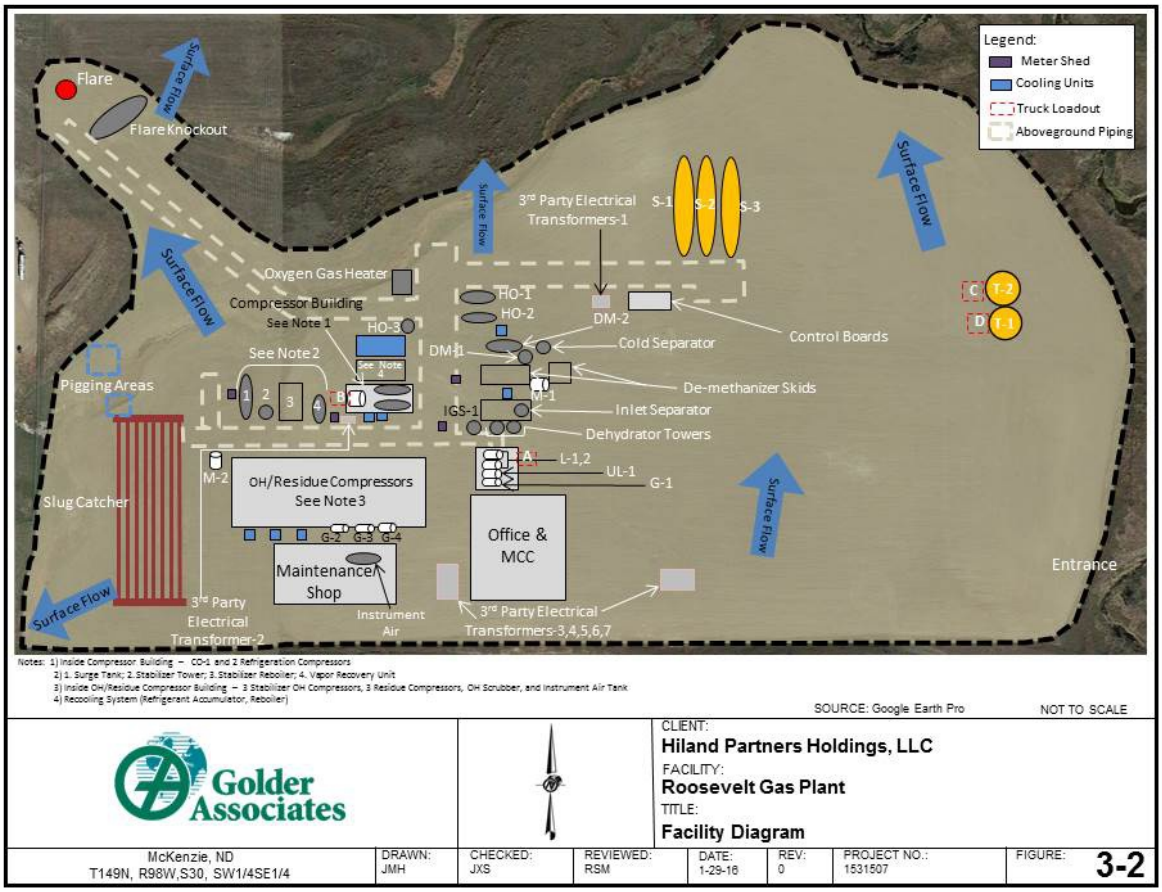
Per the requirements listed in 40 CFR §112.7 (a)(3); the facility diagram(s) on the following page(s) shows the location of the following facility elements if applicable to the site:

- Aboveground storage tanks with greater 55 gallons of oil storage (including ID #, location, and contents);
- Underground storage tanks (including location and contents). This includes those that are subject to the SPCC rule or those that are exempt;
- Storage area(s) where mobile or portable containers (55 gallons or greater) are located;
- Transfer stations such as oil transfer areas including loading/unloading racks and loading/unloading areas;
- Oil-filled Operational (Containing 55 gallons or more) such as; hydraulic systems, lubricating systems, gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device. (including location and contents);
- Connecting piping;
- Oil pits or ponds (at oil production facilities);
- Oil production facility stock tanks, separation equipment and produced water containers;
- Any other bulk storage or oil-filled operational equipment at an oil production facility; and
- Flow lines and intra-facility gathering lines at a production facility (this includes those that are subject to the SPCC rule and exempt intra-facility gathering lines subject to the requirements of 49 CFR part 192 or 195 as described in §112.1(d)(11)).

In addition to the required elements above, the facility diagram may also include the following information:

- Direction of flow in the event of a discharge (which can serve to address the SPCC requirement under §112.7(b));
- Storm drain inlets and surface waters that could be affected by a discharge;
- Location of firefighting equipment and pipe stands for foam application;
- Location of valves or drainage system control that could be used in the event of a discharge to contain oil on the site; and
- The location of important piping appurtenances such as valves, checks or other piping-related equipment (to aid in facility response and inspection efforts);

FIGURE 3-2 - FACILITY DIAGRAM



3.2.4 Facility Oil Storage

Oil, as defined in 40 CFR §112.2, is stored at the facility. An inventory of the materials at the facility that are regulated under this SPCC Plan is presented in Table 3-1. The location of bulk oil storage containers and other qualified oil-filled equipment may be found on Figure 3-2 Facility Diagram.

The facility is a transportation-related onshore facility because it is part of an "[i]nterstate and intrastate onshore and offshore pipeline systems including pumps and appurtenances related thereto as well as in-line or breakout storage tanks needed for the continuous operation of a pipeline system, and pipelines from onshore and offshore oil production facilities," as defined in 40 CFR 112.2 and Appendix A to Part 112-Memorandum of Understanding between the Secretary of Transportation and the Administrator of the Environmental Protection Agency. As such, this facility may contain compressor engines and other equipment that are part of and appurtenances to the pipeline system. While this equipment may store oil, the equipment and associated oil are transportation-related onshore facilities within DOT jurisdiction and not subject to the SPCC requirements and may therefore not be included in this plan. Any DOT jurisdictional equipment shown in this plan is shown only for reference.

3.2.5 Discharge Prevention Measures

[40 CFR §112.7(a)(3)(ii)]

This facility employs a variety of Discharge Prevention Measures including, but not limited to, oil handling employee and contractor training, equipment inspection and oil handling/loading/unloading procedures. Further detailed information on measures implemented at this facility is included in Section 5.0 of this document.

3.2.6 Discharge/Drainage Controls

[40 CFR §112.7(a)(3)(iii)]

The facility employs a variety of Discharge and Drainage Control systems, such as secondary containment around containers for the control of any drips, leaks, or spills that may occur. Detailed information can be found in Table 3-1 and Section 5.10 of this document.

Table 3-1 - Oil Storage

Per the requirements listed in 40 CFR §112.7 (a)(3) & (b); Table 3-1 identifies the contents and volume of each applicable storage container identified in Figure 3-2, including oil-filled operational equipment. Table 3-1 also identifies the following information:

- Overfill prevention method
- Secondary containment description and capacity
- Oil-filled Operational Equipment, noted as (OOE)
- Flow Through Process Vessels, noted as (PV)
- Maximum discharge rate and direction from the potential of equipment failure, such as transfer pipe, hose leaks or tank overfill.
- Integrity Testing and Inspection Methods:
    - PD = Periodic inspection conducted on a daily basis
    - PM = Periodic inspection conducted on a monthly basis
    - PQ = Periodic inspection conducted on a quarterly basis
    - AVI = Annual Visual Inspection
    - SP001 = Steel Tank Institute (STI) Standard SP001
    - API 12R = American Petroleum Institute (API) Standard 12R
    - API 653 = American Petroleum Institute (API) Standard 653
    - FTPI 2007-1 = Fiberglass Tank and Pipe Institute Standard 2007-1
- General Containment Methods should be identified as
    - Dikes, berms, or retaining walls sufficiently impervious to contain oil;
    - Curbing or drip pans;
    - Sumps and collection systems;
    - Culverting, gutters, or other drainage systems;
    - Weirs, booms, or other barriers;
    - Spill diversion ponds;
    - Retention ponds; or
    - Sorbent materials.

Bulk Storage Containers				Secondary Containment		Potential Discharge Prediction		Integrity Testing and Inspection
Container Name	Product Content	Storage Capacity (gal)	Overfill Prevention Feature	Containment Description	Capacity, Net. (gal)	Discharge Rate, Max. (gal/min)	Direction of Flow	Method
**M-1	Methane	1,000	Level Gauge	Double-Walled Tank	>1,000	50	North	N/A
**M-2	Methane	1,000	Level Gauge	Double-Walled Tank	>1,000	50	Northeast	N/A
T-1	Natural Gas Condensate	16,800	High Level Alarm/ Closed Loop	Double-Walled Tank	>16,800	250	Northwest	PM, AVI
T-2	Natural Gas Condensate	16,800	High Level Alarm/ Closed Loop	Double-Walled Tank	>16,800	250	Northwest	PM, AVI
S-1 (PV)	Natural Gas Liquids	90,000	High Level Alarm/ Closed Loop	General Containment / Active Measures	General Containment / Active Measures	500	North	PM, AVI
S-2 (PV)	Natural Gas Liquids	90,000	High Level Alarm/ Closed Loop	General Containment / Active Measures	General Containment / Active Measures	500	North	PM, AVI
S-3 (PV)	Natural Gas Liquids	90,000	High Level Alarm/ Closed Loop	General Containment / Active Measures	General Containment / Active Measures	500	North	PM, AVI
CO-1	Compressor Oil	1,000	Dial Gauge	Building Containment	1,870	50	Northwest	PM
**G-1	Glycol	1,000	Level Gauge	Double-Walled Tank	>1,000	50	North	N/A
**G-2	Glycol	1,000	Closed Loop	Double-Walled Tank	>1,000	50	Northwest	N/A

Table 3-1 - Oil Storage, Continued

Bulk Storage Containers				Secondary Containment		Potential Discharge Prediction		Integrity Testing and Inspection
Container Name	Product Content	Storage Capacity (gal)	Overfill Prevention Feature	Containment Description	Capacity, Net. (gal)	Discharge Rate, Max. (gal/min)	Direction of Flow	Method
**G-3	Glycol	1,000	Closed Loop	Double-Walled Tank	>1,000	50	Northwest	N/A
**G-4	Glycol	1,000	Closed Loop	Double-Walled Tank	>1,000	50	Northwest	N/A
UL-1	Used Lube Oil	1,000	Level Gauge	Double-Walled Tank	>1,000	50	North	PM
L-1	Lube Oil	1,000	Level Gauge	Double-Walled Tank	>1,000	50	North	PM
L-2	Lube Oil	1,000	Level Gauge	Concrete Berm	1,047	50	North	PM
Flare Knockout (PV)	Natural Gas Condensate	11,217	Dial Gauge	General Containment / Active Measures	General Containment / Active Measures	500	Northwest	PM, AVI
Cold Separator (PV)	Natural Gas Condensate	5,100	Sight Gauge	General Containment / Active Measures	General Containment / Active Measures	500	North	PM, AVI
Slug Catcher (PV)	Natural Gas Condensate	140,000	Sight Gauge/ Overfill Shutoff	General Containment / Active Measures	General Containment / Active Measures	500	North	PM, AVI
Inlet Separator (PV)	Natural Gas Condensate	1,130	Closed Loop/ Emergency Shutoff	General Containment / Active Measures	General Containment / Active Measures	500	Northeast	PM, AVI
DM-1 (PV)	Natural Gas Condensate	13,855	Closed Loop/ Emergency Shutoff	General Containment / Active Measures	General Containment / Active Measures	500	Northeast	PM, AVI

Table 3-1 - Oil Storage, Continued

Bulk Storage Containers				Secondary Containment		Potential Discharge Prediction		Integrity Testing and Inspection
Container Name	Product Content	Storage Capacity (gal)	Overfill Prevention Feature	Containment Description	Capacity, Net. (gal)	Discharge Rate, Max. (gal/min)	Direction of Flow	Method
DM-2 (PV)	Natural Gas Condensate	7,614	Closed Loop/ Emergency Shutoff	General Containment / Active Measures	General Containment / Active Measures	500	North	PM, AVI
Surge Tank (PV)	Natural Gas Condensate	53,299	Closed Loop/ Emergency Shutoff	General Containment / Active Measures	General Containment / Active Measures	500	Northwest	PM, AVI
Stabilizer Tower (PV)	Natural Gas Condensate	6,364	Closed Loop/ Emergency Shutoff	General Containment / Active Measures	General Containment / Active Measures	500	Northwest	PM, AVI
Stabilizer Reboiler (PV)	Natural Gas Condensate	3,700	Closed Loop/ Emergency Shutoff	General Containment / Active Measures	General Containment / Active Measures	500	Northwest	PM, AVI
**Residue Compressor	Natural Gas	N/A	Closed Loop/ Emergency Shutoff	Building Containment	Building Containment	N/A	Northwest	PM
**Residue Compressor	Natural Gas	N/A	Closed Loop/ Emergency Shutoff	Building Containment	Building Containment	N/A	Northwest	PM
**Residue Compressor	Natural Gas	N/A	Closed Loop/ Emergency Shutoff	Building Containment	Building Containment	N/A	Northwest	PM
**Stabilizer OH Compressor	Natural Gas	N/A	Closed Loop/ Emergency Shutoff	Building Containment	Building Containment	N/A	Northwest	PM
**Stabilizer OH Compressor	Natural Gas	N/A	Closed Loop/ Emergency Shutoff	Building Containment	Building Containment	N/A	Northwest	PM
**Stabilizer OH Compressor	Natural Gas	N/A	Closed Loop/ Emergency Shutoff	Building Containment	Building Containment	N/A	Northwest	PM

Table 3-1 - Oil Storage, Continued

Bulk Storage Containers				Secondary Containment		Potential Discharge Prediction		Integrity Testing and Inspection
Container Name	Product Content	Storage Capacity (gal)	Overfill Prevention Feature	Containment Description	Capacity, Net. (gal)	Discharge Rate, Max. (gal/min)	Direction of Flow	Method
OH Scrubber (PV)	Natural Gas Condensate	1,190	Closed Loop/ Emergency Shutoff	General Containment / Active Measures	General Containment / Active Measures	250	Northwest	PM, AVI
**Refrigeration Compressor	Natural Gas	N/A	Closed Loop/ Emergency Shutoff	Building Containment	Building Containment	N/A	Northwest	PM
**Refrigeration Compressor	Natural Gas	N/A	Closed Loop/ Emergency Shutoff	Building Containment	Building Containment	N/A	Northwest	PM
HO-1 (OOE)	Hot Oil	18,000	Sight Gauge	Alternate Measures per 112.7(k)	Alternate Measures per 112.7(k)	100	North	PM, AVI
HO-2 (PV)	Hot Oil	1,200	Sight Gauge	Concrete Berm	143	50	North	PM
HO-3	Hot Oil Overflow	4,200	Sight Gauge	Double-Walled Tank	>4,200	50	North	PM
IGS-1 (PV)	Natural Gas Condensate	1,378	Sight Gauge	General Containment / Active Measures	General Containment / Active Measures	250	Northwest	PM, AVI
3rd Party Electrical Transformer-1	Mineral Oil	550	Sight Glass	Concrete Berm	748	5	North	PM, AVI
3rd Party Electrical Transformer-2	Mineral Oil	300	Sight Glass	General Containment/ Active Measures	General Containment/ Active Measures	5	Northwest	PM, AVI
3rd Party Electrical Transformer-3	Mineral Oil	625	Sight Glass	Concrete Berm	1,660	5	North	PM, AVI

Table 3-1 - Oil Storage, Continued

Bulk Storage Containers				Secondary Containment		Potential Discharge Prediction		Integrity Testing and Inspection
Container Name	Product Content	Storage Capacity (gal)	Overfill Prevention Feature	Containment Description	Capacity, Net. (gal)	Discharge Rate, Max. (gal/min)	Direction of Flow	Method
3rd Party Electrical Transformer-4	Mineral Oil	625	Sight Glass	Concrete Berm	1,660	5	North	PM, AVI
3rd Party Electrical Transformer-5	Mineral Oil	625	Sight Glass	Concrete Berm	1,660	5	North	PM, AVI
3rd Party Electrical Transformer-6	Mineral Oil	1,000	Sight Glass	Concrete Berm	7,842	5	Northeast	PM, AVI
3rd Party Electrical Transformer-7	Mineral Oil	1,000	Sight Glass	Concrete Berm	7,842	5	Northeast	PM, AVI

Table 3-2 - Oil Transfer Areas

Per the requirements listed in 40 CFR §112.7 (a)(3) & (b); this table identifies the contents of each applicable storage container identified in Figure 3-2. A "transfer or loading/unloading area" is any area of a facility where oil is transferred between bulk storage containers and tank truck(s). These areas are subject to the general containment requirements of 112.7(c) using spill kits and/or other active response measures. Predicted Maximum Discharge Rate assumed to be from the potential of equipment failure, such as transfer pipe or hose leaks or tank overfill.

Transfer Area				Potential Discharge Prediction	
Name	Location	Product Transferred	Secondary Containment Type	Discharge Rate, Max. (Gal/Min)	Direction of Flow
Truck Loadout-A	East of L-1 and L-2	Lube Oil	General Containment/ Active Measures	50	Northeast
Truck Loadout-B	West of CO-1	Compressor Oil	General Containment/ Active Measures	50	Northwest
Truck Loadout-C	West of T-2	Condensate	General Containment/ Active Measures	50	Northwest
Truck Loadout-D	West of T-1	Condensate	General Containment/ Active Measures	50	Northwest

Note: ** Items that are non-SPCC regulated and shown for reference only.

Table 3-3 - Secondary Containment Calculations

See Section 7.0 for secondary containment calculations.

SECTION 4

Last Revised:

4.0 SPILL RESPONSE AND NOTIFICATION

4.1 SPILL COUNTERMEASURES AND RESPONSE PROCEDURES

[40 CFR §112.7(a)(3)(iv)&(v)]

This SPCC plan is developed to compliment the facility's Emergency Response Plan (ERP), which was developed in accordance with Kinder Morgan O&M Procedure 1900. The ERP contains elements of an oil spill contingency plan, as described in 40 CFR §112. Pertinent sections of the Emergency Response Plan for this SPCC Plan are as follows:

- **O&M Form OM1900-02 - Facility Personnel Responsibilities**
- **O&M Form OM1900-03 - Primary Notification Contacts**
- **O&M Form OM1900-04 - Emergency Contacts**
- **O&M Form OM1900-06 - Emergency Shutdown Device Locations**
- **O&M Form OM1900-07 - Facility Isolation**
- **O&M Form OM1900-10 - On Site Emergency Response Equipment**
- **O&M Form OM1900-11 - Contractors and Available Equipment**

The information in the ERP should be used to supplement the information available in this plan.

All Incident Response Procedures shall be in accordance with O&M Procedures 159 and 1201. At a minimum, the following steps will be taken to reduce the magnitude of the spill and initiate containment and cleanup:

1. Account for personnel, assure their safety, and evacuate if a fire, explosion, or exposure hazard exists;
2. Remove all sources of ignition and position fire suppression equipment. Alert the local Fire Department if necessary;
3. Shut off pumps and close valves that allow fuel to flow to the segment of the system causing the spill. Plug or patch leak/discharge if possible;
4. Alert adjacent property owners/operators, as warranted by the incident;
5. As safety allows, attempt to contain the spill. Prevent or divert spilled fuel from approaching structures or draining towards water or storm drains using spill response material, such as sorbent material, spark-proof shovels, brooms, neoprene gloves, and other materials;
6. Once spill is safely contained, commence initial clean-up activities, including removal of oil from secondary containment via pumping and containerizing of impacted materials such as soil and used sorbent materials.
7. The Operations Supervisor or EHS representative will conduct a safety assessment and determine additional cleanup actions, as needed; and
8. All recovered material will be placed in DOT approved containers (i.e., drums, roll-offs, etc.) and stored onsite pending waste characterization as coordinated by the facility's Environmental Representative. Based on waste characterization results, the Environmental Representative will coordinate proper handling/disposal/recycling in accordance with applicable laws and regulations.
9. Update the Reportable Spill History Log in Section 6.

For all occurrences, the Incident Commander and the ERL System protocol will evaluate the incident for any additional requirements.

4.2 SPILL NOTIFICATION AND REPORTING PROCEDURES

[40 CFR §112.7(a)(3)(iv)&(v)]

In the event of a spill or release, utilize the Kinder Morgan Emergency Response Line (ERL) system by notifying Gas Control and implement the facility's Emergency Response Plan. The ERL process is designed to enhance and facilitate real-time communication of emergency events to all necessary Kinder Morgan stakeholders of incidents, including operations, corporate personnel, EHS, and local, state, or federal agency. Detailed notification and reporting procedures can be found in O&M Procedure 159 *"Emergency Reporting and Investigation."* Where required, determinations of agency notifications will be made by Kinder Morgan via the ERL system. In the event the ERL system is unavailable, notification can be made directly by the facility using the contact information provided in the *SPCC Emergency Contact Information* section of the document on Preface 8.

4.3 EPA DISCHARGE NOTIFICATION

[40 CFR §112.4(a)]

The EPA requires notification of the Regional Administrator for any release or discharge, in any form, from this facility directly or indirectly into or upon the navigable waters of the United States or its adjoining shorelines with more than:

- 1,000-gallons in a single discharge, or
- 42-gallons in each of two or more discharges occurring within any consecutive 12-month period

Contact EHS to document the discharge details for submittal to the EPA's Regional Administrator (RA) within sixty-days (60) of the spill event. Use the *"EPA Release Notification Form,"* available in the Section 6 or an equivalent form to ensure that all required information is reported to the EPA Regional Administrator. All spills meeting the criteria above shall be recorded on the Reportable Spill History Log included in Section 6 of this Plan.

4.4 NATIONAL RESPONSE CENTER NOTIFICATION

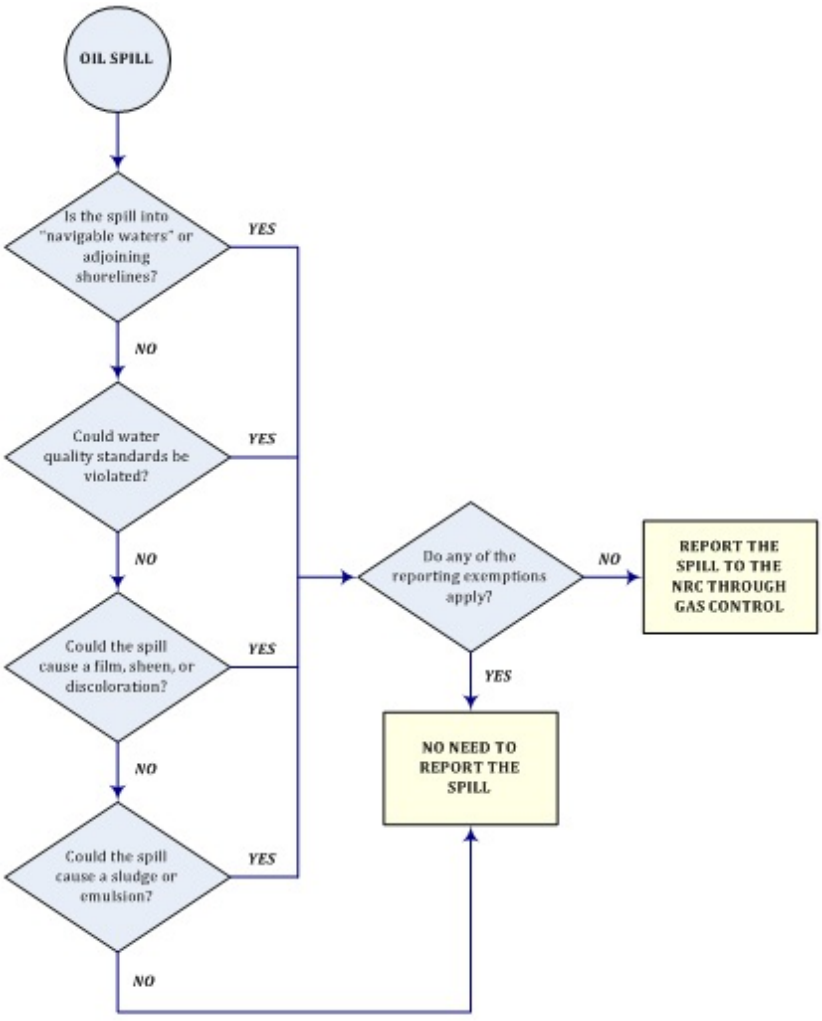
[40 CFR §110]

Certain spills or releases of oil products must be reported by the EHS Group to the National Response Center (NRC), as determined using the following flowchart. Note, this only applies to SPCC reporting criteria and does not account for reporting under other regulations, such as PHMSA. As previously noted, agency notification requirements will be determined by Kinder Morgan through the ERL System.

When notifying the National Response Center, be prepared to provide the following usually requested information:

- Name, organization and telephone number for caller
- Name, organization and contact information for party responsible for the incident
- Exact address or location of the incident
- Contact information of the Incident Commander
- Date and time of incident
- Cause of incident
- Type of oil discharged
- Estimated quantity discharged outside of containment
- Danger or threat posed by incident
- Number and type of injuries
- Weather conditions at the incident location
- Other information to help emergency personnel respond to incident

FIGURE 4-1 - NRC FEDERAL AGENCY REPORTING FLOWCHART



4.5 STATE AND LOCAL AGENCY NOTIFICATION

The State Agencies may also require notification of an oil spill or release to the appropriate agency office. Where required, notification to the State and Local Agencies will be made by Kinder Morgan via the ERL system.

SECTION 5

Last Revised: April 6, 2016

5.0 PREVENTION METHODS PROVIDED

SECTION 5

5.0 PREVENTION METHODS PROVIDED, CONTINUED

SECTION 5

5.0 PREVENTION METHODS PROVIDED, CONTINUED

5.1 POTENTIAL FOR EQUIPMENT FAILURE

[40 CFR §112.7(b)]

An inventory of the materials at the facility that are regulated under this SPCC Plan is presented in Tables 3-1 & 3-2. This table outlines a variety of information including bulk and operational equipment storage units, product contents, total storage capacities and secondary containment capacities. The locations of the storage units listed in Table 3-1 can be found on Figure 3-2: *Facility Diagram*. A prediction of the reasonable potential failures, along with flow rate and direction is also available in Tables 3-1 & 3-2.

5.2 DRAINAGE CONTROL/DIVERSIONARY STRUCTURES AND CONTAINMENT

[40 CFR §112.7(c & d)]

A description of secondary containment and/or diversionary structures or equipment for each storage unit and petroleum-handling unit at the facility is included in Tables 3-1 and 3-2. These tables include a description of the type of containment, material of construction, and containment capacity for each secondary containment structure.

All secondary containment structures described in these tables have been evaluated by the certifying PE and have been determined to be sufficiently impervious as to contain spills long enough to allow for clean up to occur in time to prevent discharges to navigable waters or adjoining shorelines, as described in 40 CFR §112.1(b). Containment capacity calculations and/or specifications are provided in Table 3-3 of this SPCC Plan.

Containment and/or diversionary structures or equipment required to prevent a discharge at the facility are practicable and there are no determinations of impracticable secondary containment.

5.3 INSPECTIONS AND RECORD KEEPING

[40 CFR §112.7(e); 112.8(c)(6), (d)(1) & (d)(4)]

This facility has developed the following written procedures for conducting inspections and tests for this facility based on good engineering practice and accepted industry standards.

5.3.1 Periodic Visual Inspections

On a periodic basis, facility personnel will visually inspect the outside of all aboveground containers and equipment for signs of deterioration, discharges, or accumulation of oil inside secondary containment areas. The periodic visual inspection will also include inspection of the secondary containment structures. Document the inspection using the Periodic SPCC Inspection Checklist available in Section 6 or an equivalent checklist as approved by the certifying engineer. The frequency of the periodic inspection is identified in Table 3-1.

Accumulated precipitation that will prevent the berms from containing the volume of the largest tank shall be removed in accordance with Section 5.10.3 of this SPCC Plan. In addition, secondary containment and bermed areas will be visually inspected after abnormally heavy rainfall events for accumulation of precipitation.

Drums or totes brought on-site are built or tested to the standard(s) or in-process inspection and testing procedures established by the drum manufacturer or the drum recycler, as applicable. While on site, drums will be visually inspected and documented at least monthly.

5.3.2 Integrity Testing

Pursuant to 40 CFR 112.8(c)(6), each above ground container must be inspected or tested on a regular schedule and when material repairs are made. The type of integrity testing to be conducted has been determined in accordance with industry standards including the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design (such as containers that are: shop-built, field-erected, skid-mounted, elevated, equipped with a liner, double-walled, or partially buried). Examples of these integrity tests include but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. The inspection or testing method used must evaluate the condition of the tank's foundation or support system.

The facility has adopted the following philosophy on integrity testing:

- For shop-built containers of 5,001 to 30,000-gallon capacity meeting Steel Tank Institute (STI) Standard SP001 Category 1 requirements, where all sides of the container are visible or where all sides of the container are visible except the bottom and the bottom is sitting on an adequately designed, maintained, and inspected synthetic liner, annual visual inspections will be utilized in lieu of formal external integrity testing every 20 years as prescribed in STI SP001. These shop-built containers present a relatively low risk for catastrophic failure and annual visual inspections provide equivalent environmental protection for identifying corrosion and maintenance issues before they pose a significant catastrophic failure risk. For tanks meeting this criteria, the Annual Checklist for External Condition Examination of Section 6, or equivalent as approved by the certifying engineer, will be completed by December 31 of each year. Tanks meeting these criteria and utilizing this environmental equivalence determination are identified as AVI in Table 3-1.
- For tanks not meeting the above criteria, integrity tests will be conducted in accordance with the appropriate industry standard (i.e., STI SP001, API 653, etc) as identified in Table 3-1. Scope and schedules will be maintained at the facility in the vessel's prior integrity testing report as the scope and schedule will vary, in accordance industry standards, based on the results of the prior integrity tests. Integrity testing schedule will also be documented in opsInfo.
- For tanks subject to other integrity testing programs designed to meet DOT, PSM or other programs that are based on industry standards and meet the tank integrity testing requirements of SPCC, the integrity testing performed to meet those requirements are considered sufficient to meet the requirements of this part and do not need to be duplicated.

5.3.3 Aboveground Pipes, Valves, and Appurtenances

All aboveground pipes, valves, and appurtenances will be inspected on a monthly basis. The inspection will include an assessment of the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces.

5.3.4 Buried Pipes, Valves, and Appurtenances

All buried pipes, valves, and appurtenances will be integrity and leak tested at the time of installation, modification, construction, relocation, or replacement.

5.3.5 Record Keeping

Document all inspections using the appropriate checklist available in Section 6 or an equivalent checklist (as approved by a Professional Engineer). The inspection checklist will be used to document the occurrence and description of inspections and integrity testing performed at the facility. Records of integrity tests should be maintained for comparison purposes. Signed and dated records of inspections and other pertinent information, such as spills, removal and disposal of spill contaminated materials, replacement or repair of equipment, and training are kept at the facility office for a minimum of 3 years.

5.4 PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

[40 CFR §112.7(f)]

5.4.1 Personnel Instructions

Personnel handling oil at the facility are instructed on job responsibilities and duties. They are under the direct supervision of the facility manager who is responsible for establishing daily performance and duty guidelines. Annual training for oil-handling employees includes:

- Operation and maintenance of equipment to prevent the discharge of oil;
- Discharge procedures and protocols (cleanup methods and notification);
- Applicable pollution control laws, rules, and regulations; and
- General facility operations, which include instruction in proper inspection techniques, record keeping, and inventory control procedures.

Successful completion of this annual training includes successful completion of the Computer Based Training (CBT) or an instructor led training for all oil-handling personnel. A record of all training is maintained for a minimum of 3 years in Kinder Morgan's LMS training management system.

5.4.2 Designated Person Accountable for Spill Prevention

The Operations Supervisor of the facility is the primary person accountable for spill prevention. The Operations Supervisor may delegate the implementation of certain elements of this Plan to qualified oil-handling employees as necessary to prevent spills. The Operations Supervisor has the authority to commit all resources and personnel necessary for spill prevention and control at the facility. Unmanned facilities are intermittently inspected by on-duty personnel. The Gas Control Department is the primary responsible party outside of normal business hours. Refer to the *SPCC Emergency Contact Information* section at the beginning of this plan for the contact information for the Kinder Morgan Gas Control and Federal and State agencies.

5.4.3 Spill Prevention Briefings and Facility SPCC Plan Review

SPCC spill prevention briefings and facility SPCC Plan Reviews are held at least once a year to assure adequate understanding of the SPCC Plan for the facility. Briefings will highlight and describe known discharges as described in 40 CFR §112.1(b), or failures, malfunctioning components, and recently developed precautionary measures. This briefing and plan review will also highlight any changes to the facility during the last year, including but not limited to, changes in oil storage and facility personnel. Spill prevention briefings will be documented in Kinder Morgan's LMS system. Spill Prevention Briefing Record form in Section 6 is also available to document topics covered during the Briefing if needed.

5.5 SITE SECURITY

[40 CFR §112.7(g)]

Site security measures are provided commensurate with the type of facility and facility location. Per SPCC regulation, onshore non-production facilities will comply with the following minimum site security requirements of 40 CFR §112.7(g). Any additional site security measures required to meet other regulatory requirements or internal company requirements are documented via a Site Security Assessment conducted in accordance O&M 510 *Security, Company Facilities*.

5.5.1 Fencing

All oil-handling, processing and storage areas are located within perimeter fencing, which provides security to protect against vandalism and access by unauthorized persons.

5.5.2 Flow Valves

Master flow and drain valves and any other valves that will permit direct outward flow of the tank's contents to the surface are located in areas only accessible by authorized personnel when in non-operating or non-standby status.

5.5.3 Start Controls

Where applicable, starter controls for all oil transfer pumps are kept in the off position and located in areas only accessible by authorized personnel when the pump is in a non-operating or non-standby status.

5.5.4 Pipeline Loading and Unloading Connections

All loading and unloading connections located in areas only accessible by authorized personnel to prevent unauthorized usage. All loading and unloading piping and hoses are blind-flanged when not in service for a period of 6-months or more.

5.5.5 Lighting

Facility lighting to prevent and detect spills at night, as well as, prevent spills through acts of vandalism has been considered and where appropriate, adequate lighting is provided. To avoid undue attention, unattended facilities that are remotely located (away from inhabited areas) may not have facility lighting[4].

5.6 FACILITY LOADING/UNLOADING OPERATIONS

[40 CFR §112.7(a)(3)(ii) & (h)]

Occasionally, natural gas condensates and other oils may be taken from the facility and oil may be delivered to the facility by tank trucks. Facility or delivery personnel are present during all loading and unloading events in designated areas. Spill kits are available during loading and unloading operations to address minor spills or releases. In areas where storm water drains not tied to a treatment system may be impacted, drain covers shall be installed during loading operations. Actions to contain and report any spills resulting from the truck loading/unloading would be immediate.

Where loading and unloading racks (containing a fixed articulating loading arm) are available, the rack transfer area is provided with secondary containment to hold at least the maximum capacity of any single compartment of a tank car or tank truck. Warning signs, wheel chocks, or a complete vehicle walk-around are used at the loading/unloading racks to prevent vehicles from departing before complete disconnection of flexible or fixed transfer lines. The drivers remain with the trucks during transfer operations to monitor the transfer; inspect outlets, connections, and valves on the tanker truck before and after the transfer; and make adjustments as necessary.

All tank truck drivers are required to comply with Department of Transportation (DOT) regulations in 49 CFR Part 177 and facility standard operating procedures. All drivers must be authorized and certified by Kinder Morgan or its subsidiaries to load or unload product at the facility. Site specific Truck loading and unloading procedures are in accordance with Kinder Morgan O&M Procedure 106.

5.7 BRITTLE FRACTURE EVALUATION

[40 CFR §112.7(i)]

All field-constructed aboveground containers and tanks that are repaired, altered, or reconstructed will be evaluated for risk of discharge or failure due to brittle fracture or other catastrophe. In addition, if there has been a change in service that might affect the risk of a discharge or failure due to fracture or other catastrophe, a brittle fracture tank evaluation will be completed. Based on the results of the evaluation, appropriate action will be taken.

5.8 CONFORMANCE WITH OTHER APPLICABLE GUIDELINES

[40 CFR §112.7(j)]

This Plan provides detailed discussions of conformance with the applicable requirements and other effective discharge prevention and containment procedures used at the facility. State environmental agency spill prevention and reporting requirements and state oil and gas commission spill prevention and reporting requirements have been included in this plan where applicable. In the event of a reportable release, notification to Federal, State and local agencies will be made by Kinder Morgan via the ERL system.

5.9 OIL FILLED OPERATIONAL EQUIPMENT

[40 CFR §112.7(k)]

Oil-filled operational equipment located at this facility have sufficient general secondary containment as described in 40 CFR §112.7(c) and may include: (i) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (ii) Curbing or drip pans; (iii) Sumps and collection systems; (iv) Culverting, gutters, or other drainage systems; (v) Weirs, booms, or other barriers; (vi) Spill diversion ponds; (vii) Retention ponds; or (viii) Sorbent materials.

It is noted that certain oil-filled operational equipment may meet the qualification of not having a single discharge of more than 1,000 US gallons or no two discharges of 42 US gallons or more in the preceding 3 years as listed in 40 CFR §112.7(k)(1). Such qualified operational oil-filled equipment may opt to meet the alternative requirements to general secondary containment as described in 40 CFR §112.7(k)(2).

The alternative requirements include:

- Establishing and documenting facility procedures for equipment inspections or a monitoring program to detect equipment failure; and,
- Submittal of a Facility Response Plan under 40 CFR §112.20, or
    - Development of an Oil Spill Contingency Plan following the provisions of 40 CFR §109; and,
    - Written commitment of manpower, equipment, and material required to expeditiously control and remove any quantity of oil discharged that may be harmful.

5.10 FACILITY DRAINAGE

[40 CFR §112.8(b)]

Surface drainage within the facility is governed by surface topography. Storm water drainage flow arrows on Figure 3-2: *Facility Diagram* indicate the general direction of storm water flow for the site, as well as any other pertinent surface features that may affect surface flow or the ability to control an oil spill and prevent it from leaving the site.

5.10.1 Restrain Drainage from Diked Storage Areas

[40 CFR §112.8(b)(1)]

Within secondary containment structures, drainage is restrained by manual release valves. Precipitation that may accumulate in the containment areas is normally allowed to evaporate. If removal of the retained water within the containment structure is necessary, it will be inspected for the presence of oil (surface sheen) prior to discharge or removal to ensure no oil will be discharged if storm water will be discharged to the ground or into a storm water drain or effluent system that flows to an open watercourse. See Section 5.11.3 for further details regarding drainage and inspection of storm water in diked storage area.

5.10.2 Valves Used on Diked Storage Area

[40 CFR §112.8(b)(2)]

Diked or bermed areas at the facilities may be equipped with drainage valves. Where drain valves are installed, flapper-type drain valves are not used to drain diked areas. Manual open-and-close design drainage valves are utilized and are secured in the closed position when not in use.

5.10.3 Facility Drainage System from Undiked Areas

[40 CFR §112.8(b)(3)]

The undiked areas of the facility may contain aboveground transfer piping without containment sleeves, including loading/unloading areas, and operational equipment, whose primary purpose is not the storage of oil in bulk. A typical release from piping would consist of minor drips/leaks. For sites with aboveground piping located in undiked areas, the facility is equipped with spill kits and absorbents to be used as general secondary containment in the event of a leak from the above ground piping. This type of active containment is appropriate to prevent discharged oil from reaching a navigable watercourse under 40 CFR §112.7(c). Regular inspections are made by facility operators and any leaks or releases will be immediately contained using on-site spill control equipment such as absorbent pads, socks, and granular absorbent. General surface drainage patterns at the facility are shown on Figure 3-2: *Facility Diagram*.

5.10.4 Final Discharge of Drainage

[40 CFR §112.8(b)(4)]

Drainage off the property follows natural drainage patterns, governed by surface topography. Any spill/flow originating from any storage container considered in this SPCC Plan would be contained on site through the use of passive and active secondary containment methods. No oil would be discharged from the property.

Personnel and equipment are available to construct additional emergency containment basins or dikes that would contain any spill should additional actions be required to prevent oil from leaving the site. Spilled oil that might accumulate will be contained with portable booms and recovered using a vacuum truck, pump, or other appropriate method, and then be properly disposed of or recycled. Detailed lists of available emergency equipment are maintained in the Emergency Response Plan in:

- **O&M Form OM1900-10 - On Site Emergency Response Equipment**
- **O&M Form OM1900-11 - Contractors and Available Equipment**

5.10.5 Facility Drainage from Multiple Unit Treatment Systems and Equipment

[40 CFR §112.8(b)(5)]

Not applicable; there is not a multiple unit treatment system with continuous treatment of drainage waters occurring at the facility.

5.11 BULK STORAGE TANKS/SECONDARY CONTAINMENT

[40 CFR §112.8(c)]

5.11.1 Tank Compatibility with its Contents

[40 CFR §112.8(c)(1)]

Materials used for all storage tanks are compatible with the product stored and the conditions of storage.

5.11.2 Diked Area Construction and Containment Volume for Storage Tanks

[40 CFR §112.8(c)(2)]

All bulk storage units are located within secondary containment structures large enough to contain the entire contents of the largest tank in the containment structure while allowing for adequate freeboard to contain precipitation events, unless the facility is covered by a Facility Response Plan under 40 CFR 112.20 or an Oil Spill Contingency Plan under 40 CFR 109. The type of containment and containment capacity are included in Tables 3-1 and 3-2. Detailed berm capacity calculations are provided in Table 3-3. Containment structure locations are shown in Figure 3-2: *Facility Diagram*. As Described in Section 5.2 of this plan, all secondary containment structures described in these tables have been evaluated by the certifying PE and have been determined to be in accordance with good engineering practice and sufficiently impervious and sized as to contain spills long enough to allow for clean up to occur in time to prevent discharges to navigable waters or adjoining shorelines, as described in 40 CFR §112.1(b).

Diked areas will be maintained in a manner that ensures the integrity of the containment structure, including, but not limited to, the removal of vegetation, sealing of cracks in concrete containment walls, and repair of erosion of earthen berms. Diked areas will be inspected on a monthly basis according the Periodic SPCC Inspection Checklist included is Section 6 of this Plan. All identified maintenance and repair issues identified that could affect the ability of the containment structure to hold a spill until such time that it can be cleaned up will be completed as soon as practicable.

5.11.3 Drainage of Rainwater from Diked Areas

[40 CFR §112.8(c)(3)]

Accumulated precipitation that will prevent the berms from containing the volume of the largest tank will be removed. In addition, diked and bermed areas will be visually inspected after abnormally heavy rainfall events for excess rainwater accumulation. Rainwater may be removed from the secondary containment in a variety ways, including, but not limited to; transferring to storage tanks, discharge to onsite treatment systems, discharge to onsite evaporation systems, removal via vacuum truck, and draining to the ground.

For uncontaminated rainwater drained from a diked secondary containment area to the ground, into a storm drain or discharge of an effluent into an open watercourse, lake, or pond:

- The containment drainage or bypass valve will normally remain secured in the closed position;
- Accumulated rainwater will be inspected for the presence of oil that could cause a discharge to navigable waters or adjoining shorelines, as described in 40 CFR §112.1(b);
- The drainage or bypass valve will be opened and re-sealed under responsible supervision of trained oil-handling personnel; and,
- Records will be kept of discharge events sufficient to meet any other regulatory requirements, such as NPDES permits issued in accordance with 40 CFR §122.41. The *Secondary Containment Drainage Log* included in Section 6 of this SPCC Plan may be used to meet this requirement.

If the presence of oil is detected in rainwater that is to be discharged from a secondary containment area as described above, the oil will be removed from the secondary containment prior to discharge or the entire contents of the oily rainwater will be removed in some other manner, such as via vacuum truck or being pumped into a holding tank for disposal. Removed water is disposed of in accordance with applicable local, state, and federal regulations. Any water removed from the containment areas via approved methods other than discharging the water directly to the ground, into a storm drain or discharge of an effluent into an open watercourse, lake, or pond are not required to be inspected prior to discharge because there is no release as described in 40 CFR §112.8(c)(3).

5.11.4 Corrosion Protection of Buried Metallic Storage Tanks

[40 CFR §112.8(c)(4)]

Where applicable, buried metallic storage tanks at the facility will be provided with corrosion protection. Acceptable forms of corrosion protection include, but are not limited to, cathodic protection systems, rectifier systems, sacrificial anodes, or protective coatings.

5.11.5 Corrosion Protection of Partially Buried Metallic Storage Tanks

[40 CFR §112.8(c)(5)]

Where applicable, buried metallic storage tanks at the facility will be provided with corrosion protection. Acceptable forms of corrosion protection include, but are not limited to, cathodic protection systems, rectifier systems, sacrificial anodes, or protective coatings.

5.11.6 Aboveground Tank Inspections

[40 CFR §112.8(c)(6)]

On a periodic basis, as defined in Table 3-1, personnel will visually inspect the outside of all aboveground containers for signs of deterioration, discharges, or accumulation of oil inside diked areas and document the inspection on the periodic inspection checklist available in Section 6 or an equivalent checklist as approved by the certifying Professional Engineer. Signed and dated inspection records must be retained for 3 years. Details on Kinder Morgan's Tank Integrity Testing Program can be found in Section 5.3.2 of this document.

5.11.7 Control of Leakage through Internal Heating Coils

[40 CFR §112.8(c)(7)]

Not Applicable, steam heating coils are not utilized for bulk storage tanks. Where applicable, internal steam heating coils will be monitored for contamination at the steam returns and exhaust line.

5.11.8 Engineered Overfill Prevention Features

[40 CFR §112.8(c)(8)]

Automatically filled bulk-oil storage containers at the facility are equipped with overfill prevention devices as shown in Table 3-1. All overfill prevention devices are inspected and tested as part of the bulk storage tank examination and inspection protocol identified in Section 5.3 of this SPCC Plan. Site glasses and other gauges are inspected as part of the periodic visual inspection.

5.11.9 Observation of Disposal Facilities for Effluent Discharge

[40 CFR §112.8(c)(9)]

Where facility effluent treatment systems are utilized, the facility will inspect the system for possible upsets that could cause a discharge of oil.

5.11.10 Visible Oil Leak Corrections from Tank Seams and Gaskets

[40 CFR §112.8(c)(10)]

On-site personnel immediately repair any visible oil leaks at the facility, including but not limited to leaks form seams, gaskets, piping, pumps, valves, rivets, and bolts. Any spilled oil is cleaned up immediately using on-site spill response equipment and supplies.

5.11.11 Appropriate Position of Mobile or Portable Oil Storage Tanks

[40 CFR §112.8(c)(11)]

To prevent discharges of oil as described in 40 CFR §112.1(b), mobile or portable oil storage tanks greater than 55 US gallons in size are positioned and/or located within secondary containment of sufficient size to contain the entire contents of the largest container with sufficient freeboard for containing precipitation.

5.12 FACILITY TRANSFER OPERATIONS

[40 CFR §112.8(d)]

5.12.1 Buried Piping Installation Protection and Installation

[40 CFR §112.8(d)(1)]

Kinder Morgan has developed procedures for protecting buried metallic pipelines from external corrosion in conformance with applicable codes, accepted industry practices and company specifications. The following conditions are included in the program.

All buried piping that is installed or replaced on or after August 16, 2002 are provided with protective wrapping and coating and cathodic protection, or otherwise satisfy the corrosion protection provisions for piping in 40 CFR Part 280 or a state program approved under 40 CFR §281. Buried piping installed or replaced prior to August 16, 2002 are provided with protective wrapping and coating and cathodic protection if soil conditions warrant. Any buried equipment will be visually inspected for corrosion whenever exposed through excavation. Further inspection and correction will be conducted on the affected metal equipment if problems are identified.

5.12.2 Not in Service and Standby Service Terminal Connections

[40 CFR §112.8(d)(2)]

When an oil transfer pipe is not in service or is in a standby service for an extended period of time, such as six months or greater, the pipe is ball-plugged or blind-flanged at the transfer point and is marked as to their tie-in connection.

5.12.3 Pipe Support Design

[40 CFR §112.8(d)(3)]

All pipe supports at the facility are designed to minimize abrasion and corrosion and to allow for expansion and contraction. Pipe supports are routinely inspected as part of the monthly visual inspections described in Section 5.2 of this SPCC Plan.

5.12.4 Aboveground Valve and Pipeline Examination

[40 CFR §112.8(d)(4)]

All aboveground valves and pipelines are routinely inspected as described in Section 5.3 of this SPCC Plan.

5.12.5 Aboveground Piping Protection from Vehicular Traffic

[40 CFR §112.8(d)(5)]

Where applicable, vehicular traffic is warned by clearance signs to ensure that vehicles will not endanger aboveground piping at the facility.

5.13 FACILITY RESPONSE PLANS

[40 CFR §112.20 and §112.21]

Certification of Substantial Harm Determination, as defined in *40 CFR §112.20,* is included in Section 2.4 of this Plan. If the Substantial Harm Determination criteria is met, a Facility Response Plan shall be developed in accordance with *40 CFR §112.20* and *§112.21*.

SECTION 6

Last Revised:

6.0 FORMS, LOGS AND CHECKLISTS

Forms, Logs and Checklists

FORMS, LOGS AND CHECKLISTS

Click to view/print Reportable Spill History Log

REPORTABLE SPILL HISTORY LOG

In the event of a release of any kind, implement the ERL System (Section 4.2) to determine if the release is immediately reportable to State or Federal Agencies. The EPA requires notification of the Regional Administrator for any release or discharge of oil, in any form, from this facility directly or indirectly into or upon the navigable waters of the United States or its adjoining shorelines with more than:

- 1,000-gallons in a single discharge, or
- 42-gallons in each of two or more discharges occurring within any consecutive 12-month period

Contact EHS to document the discharge details for submittal to the EPA's Regional Administrator (RA) within sixty-days (60) of the spill event. Use the "*EPA Release Notification Form*," available in the Section 6 or an equivalent form to ensure that all required information is reported to the EPA Regional Administrator.

Date	Storage Unit	Cause of Release	Material Released	Quantity Released (gallons)	Quantity Recovered (gallons)	Water Body Impacted	Notes on Incident

FORMS, LOGS AND CHECKLISTS, CONTINUED

Click to view/print EPA Release Notification Form

EPA RELEASE NOTIFICATION FORM

INCIDENT DESCRIPTION

Reporter's Name		Title	
Office Phone No.		Mobile Phone No.	
Facility Address			
County		Owner's Address	
Spill Location			
Source/Cause of Discharge			
Date & Time of Discharge			
Spilled Product		Est. Quantity	
Water Impact	□ Yes □ No	If yes, Est. Qty into Water	

RESPONSE ACTION(S)

Action(s) taken to Correct, Control, or Mitigate Release:			
Any Injuries		Any Fatalities	
Evacuation Needed		Number Evacuated	
Description of Impacted Media:			
Notification(s)	☐ National Response Center (NRC). (800) 424-8802		
(Check all that have been contacted)	☐ State		
	☐ Fire		
	☐ Police		
	☐ Others		

FORMS, LOGS AND CHECKLISTS, CONTINUED

Click to view/print Spill Prevention Briefing Record

SPILL PREVENTION BRIEFING RECORD

INSTRUCTIONS: Briefings will be scheduled and conducted by the owner or operators for operating personnel at intervals frequent enough to assure adequate understanding of the SPCC plan for this facility. These briefings should also highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. During these briefings there will be an opportunity for facility operators and other personnel to share recommendations concerning health, safety and environmental issues encountered during operation of the facility. Completion of the "Spill Prevention Briefing Record" can be documented with the OM100-20 form (Training or Safety Attendance Record) and entered into LMS at the same time as the completion of the Site Specific SPCC Plan review.

NOTE: This spill briefing is separate from the **annual** SPCC training for oil-handling personnel.

Date: _____

Attendees:

_____

_____

_____

_____

_____

Subjects and Issues:

_____

_____

_____

_____

_____

Recommendations and Suggestions:

_____

_____

_____

_____

FORMS, LOGS AND CHECKLISTS, CONTINUED

Click to view/print Annual Checklist for External Condition Examination

ANNUAL CHECKLIST FOR EXTERNAL CONDITION EXAMINATION

Date of Inspection: _____ Facility Name: _____

Tank Name/ID: _____

Inspector Name and Signature: _____

By December 31 of each year, complete this visual inspection for each tank which qualifies for frequent visual inspections. Retain a copy of the completed checklist for 36 months (3 years). Checklist follows API and STI Inspection Standards and guidelines for tank inspections. For questions on this checklist please contact your EHS representative.

A. IDENTIFICATION		
1. Size		
2. Date of Prior Inspection		
3. Measured or Estimated Liquid Level		
4. Tank Material		
5. What type of support is tank situated on (concrete, soil, etc.)?		
6. Contents		
INSPECTION ITEMS	**Yes/No/NA**	**CORRECTIVE ACTION***
B. FOUNDATION		
1. Tank properly supported, supports in good condition?		
2. Cracking or spalling of concrete pad or ring wall?		
3. Evidence of settlement or foundation washout?		
4. Grounding strap in good condition?		
Comments: _____ _____ _____		

INSPECTION ITEMS	Yes/No/NA	CORRECTIVE ACTION
C. TANK BOTTOM		
1. Visible signs of leakage around tank bottom?		
2. Inadequate drainage away from tank?		
Comments: _____ _____ _____		
D. TANK SHELL		
1. Active leaks?		
2. Signs of past leakage?		
3. Problems with structural integrity (Distortions, Warping)?		
4. Coating condition unsatisfactory?		
5. Evidence of paint failure?		
6. Severe corrosion and/or pits?		
Comments: _____ _____ _____		
E. ROOF DECK		
1. Holes?		
2. Inadequate drainage off of deck?		
3. Coating condition unsatisfactory?		
4. Severe corrosion and/or pits?		
Comments: _____ _____ _____ _____		

INSPECTION ITEMS	Yes/No/NA	CORRECTIVE ACTION
F. VENTING		
1. Vents free of obstruction?		
2. Thief hatch and vent valve seals air tight?		
3. Emergency vent operable? Lift as required?		
4. All tank openings properly sealed?		
Comments: _____ _____ _____		
G. INSULATED TANKS		
1. Insulation in good condition?		
2. Are there noticeable areas of moisture on insulation?		
3. Mold on insulation?		
4. Is the insulation sufficiently protected from water intrusion?		
Comments: _____ _____ _____		
H. TANK CONTAINMENT		
1. Containment structure in satisfactory condition?		
2. Drainage pipes/valves fit for continued service?		
3. Tank area clear of trash and vegetation?		
Comments: _____ _____ _____		

INSPECTION ITEMS	Yes/No/NA	CORRECTIVE ACTION
I. APPURTENANCES/MISCELLANEOUS		
1. Gas blanket system operational (if applicable)?		
2. Stairways/walkways structurally sound?		
3. Proper warning signs in place?		
4. If fiberglass tanks, all metal parts bonded or gas blanket operational?		
5. Cathodic protection system operational?		
6. Rectifier Reading?		
7. Pipeline properly supported?		
8. Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?		
9. Has the liquid level sensing device been tested to ensure proper operation?		
10. Tank liquid level gauge readable and in good condition?		
11. Are overfill protection devices in proper working condition?		
12. Is electrical equipment in good condition? (grounding lines, lights, control boxes, etc.)		
Comments: _____ _____ _____		
J. OTHER		
1. Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?		
Comments: _____ _____ _____		

FORMS, LOGS AND CHECKLISTS, CONTINUED

Click to view/print Periodic SPCC Inspection Checklist

PERIODIC SPCC INSPECTION CHECKLIST

This SPCC periodic inspection checklist incorporates the elements of applicable industry standards (i.e., STI SP001, API 653) for frequent inspection of storage tanks as well as additional facility inspection requirements. This form (or an equivalent as authorized by the certifying PE) is to be completed at the frequency indicated in Table 3-1 and stored in the facility's environmental files for 3 years from the inspection date shown. All non-acceptable items identified shall be promptly noted and corrected. All corrective action shall be noted on this form along with the final completion date of corrective action.

This form is designed to be cover the entire facility; however multiple copies may be used to cover individual areas of the facility if required.

Date of Inspection: _____ Facility/Location: _____

Inspector Name and Signature: _____

INSPECTION ITEMS	ACCEPTABLE (YES/NO/NA)	CORRECTIVE ACTION*
A. BULK-STORAGE TANKS		
1. Seam integrity acceptable (no visible leaks)		
2. Equalizer lines in proper open/closed position		
3. Hi/Lo level alarms/shutdowns are operating (tested annually)		
4. Vacuum protection is unobstructed		
5. Tanks' hatches are latched closed		
6. External tank corrosion level acceptable		
7. Corrosion protection system is operating		
8. Tank foundations/supports in good condition		
9. Tank sides free of contact with soil		
10. Drain valves are operable and in the closed position		
11. Test liquid level sensing devices for proper operation		
12. Interstitial space of double-walled free of liquids using visual inspection or alarm indicator		
13. 55 Gallon Drums are in good working condition		
B. SECONDARY CONTAINMENTS		

INSPECTION ITEMS	ACCEPTABLE (YES/NO/NA)	CORRECTIVE ACTION*
1. Berms/firewalls free of erosion or integrity issues		
2. Foundation of firewall free of erosion		
3. Seals in joints of firewalls are intact		
4. Drain valves are closed and secured		
5. Drain valves have bull plugs or blind-flanges (unmanned locations)		
C. VESSELS AND EQUIPMENT		
1. Valve glands and bodies are in good condition		
2. Flange joints are properly aligned and tightened		
3. Gauge glasses are intact and operating		
4. Drip pan drains are unobstructed		
5. Equipment free of excess external corrosion		
D. PIPING AND PIPELINES		
1. Piping free of excess external corrosion		
2. Hi/Lo pressure shutdowns are operating (tested annually)		
3. Pipe supports adequately supporting pipe or pipeline		
4. Corrosion protection system is operating		
E. GENERAL FACILITY		

INSPECTION ITEMS	ACCEPTABLE (YES/NO/NA)	CORRECTIVE ACTION*
1. Drain ditches, catch basins, ponds, sumps are free of accumulated oil and operating properly		
2. Loading ground line is good condition		
3. Security gates are locked on a daily basis		
4. Any oil spills properly reported to EHS		
5. Spill kit(s) contents and equipment in good condition for spill response.		
6. All facility changes properly reported to EHS		

* Describe the corrective action(s) taken, referencing the number from above:

_____

_____

_____

_____

_____

_____

_____

_____

FORMS, LOGS AND CHECKLISTS, CONTINUED

Click to view/print Facility Change Form

FACILITY CHANGE FORM

This form may be completed and submitted to the facility's Environmental Representative for determination of any required technical or administrative amendments to the SPCC Plan.

Facility/Location: _____

Inspector Name: _____ Date of Inspection: _____

Inspector Signature: _____

Date of Facility Change: _____

Description of Facility Change: _____

_____

_____

_____

_____

_____

_____

_____

Did change include:

Adding, replacing or removing a storage tank (55 gallons or greater)?	Yes / No
Construction, alteration or demolition of secondary containment?	Yes / No
Reconstruction, replacement or installation of piping systems?	Yes / No
Modifications of testing, inspection and maintenance procedures?	Yes / No
Changes or updates facility response personnel or contact information?	Yes / No
Changes to available spill response equipment or ability to respond to a spill?	Yes / No

Any required amendments to the SPCC plan will be recorded in Table 2-1: *SPCC Plan Amendment Log.* All technical amendments will be certified by a professional engineer.

FORMS, LOGS AND CHECKLISTS, CONTINUED

Click to view/print Corrective Actions

SPCC CORRECTIVE ACTIONS

This form is to be used to record any corrective actions taken at the facility.

Issue / Deficiency	Corrective Action	Proposed Completion Date of Corrective Action	Actual Completion Date of Corrective Action	Name, Title and Signature Indicating that Corrective Action Was Completed

FORMS, LOGS AND CHECKLISTS, CONTINUED

Click to view/print Containment Drainage Log

CONTAINMENT DRAINAGE LOG

This form is to be used to meet the requirement described in Section 5.11.3 of this Plan. For uncontaminated rainwater drained from a diked secondary containment area to the ground, into a storm drain or discharge of an effluent into an open watercourse, lake, or pond:

- Visually inspect water for an oil slick or sheen
- Check for hydrocarbon odors
- If no signs of pollutants, you may discharge rain water
- If pollutants observed, Notify Operations Supervisor to conduct investigation and remove fluids by other means.
- Ensure all drain valves are sealed in the closed position after discharge is complete

Date	**Storage Unit**	**Cause of Liquid Accumulation**	**Appearance** (Visual, odor, etc.)	**Quantity Removed, Est.** (inches or gallons)	**Method of Removal**	**Time Valve Opened**	**Time Valve Closed**	**Inspected By:** (Full Name)

7.0 ADDITIONAL DOCUMENTATION

Click to view/print Roosevelt GP CO-1 Secondary Containment

Secondary Containment (Berm) Volume Calculations
Roosevelt Gas Plant CO-1 Containment

Volume of Containment Structure

Berm Type	Rectangular, No Taper	Building Containment
Height (ft)	0.17	
Width (ft)	50.00	
Length (ft)	30.00	

Containment Volume (gals) 1,870.13

Additional Containment Volume from Below-Grade Sump

Sump Shape	(none)
Length (ft)	
Width (ft)	
Depth (ft)	
Calculated Volume (gals)	

Additional Containment Volume - Manual Input

Enter Volume (gals)	
Describe Additional Vol:	

Freeboard Standard: 110% of Largest Tank Volume

Enter 0 in cell at right	0
Volume Displaced (gals)	0.00

Largest Tank Volume Calculations

Tank ID	CO-1	
Tank Contents	Compressor Oil	
Tank Shape	Cylinder	
Tank Orientation	Horizontal	
Diameter (ft)	4.50	
Length (ft)	8.50	
Calculated Volume (gals)	1011.26	
Labeled Volume (gals)*	1000.00	**If container not labeled use delete key to clear the cell.*

**Note: When available, the labeled container volume is used in the calculations.*

Volume Displacement from Tanks and Other Obstructions

Tank ID	Tank Contents	Tank Shape	Tank Orientation	Diameter Height if Rect. Tank (ft)	Length Weld to Weld if Bullet (ft)	Width Rect. Tanks Only (ft)	Volume (gals)	Volume of Secondary Containment Displaced (gals)
		Cylinder	non-elevated, vertical					
		Rectangular	non-elevated, vertical					
		Rectangular	non-elevated, vertical					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
			Enter displacement from other obstructions, in gallons (1 ft^3 = 7.481 gallons):					
			Describe Obstructions:					

Summary

Containment Capacity (gals)	1,870	
Volume Displaced by Rainfall (gals)	0	
Volume Displaced by Tanks & Obstructions (gals)	0	
Berm Volume Less Tank & Rainfall Displacement (gals)	1,870	
Largest Tank Capacity (gals)	1,000	
% of Largest Tank Volume Contained	187%	*Result must be 110% or greater to allow for adequate precipitation.*

7.0 ADDITIONAL DOCUMENTATION, CONTINUED

Click to view/print Roosevelt GP HO-2 Secondary Containment

Secondary Containment (Berm) Volume Calculations
Roosevelt Gas Plant HO-2 Containment

Volume of Containment Structure

Berm Type	Rectangular, No Taper
Height (ft)	0.50
Width (ft)	4.50
Length (ft)	8.50

Containment Volume (gals)	143.06

Additional Containment Volume from Below-Grade Sump

Sump Shape	(none)
Length (ft)	
Width (ft)	
Depth (ft)	
Calculated Volume (gals)	

Additional Containment Volume - Manual Input

Enter Volume (gals)	
Describe Additional Vol:	

Freeboard Standard: 25 yr, 24-hr Rainfall (in)

25 yr, 24-hr Rainfall (in)	3.5
Volume Displaced (gals)	83.45

Largest Tank Volume Calculations

Tank ID	HO-2
Tank Contents	Hot Oil
Tank Shape	Bullet
Tank Orientation	Horizontal
Diameter (ft)	4.50
Length Weld to Weld (ft)	8.00
Calculated Volume (gals)	1308.69
Labeled Volume (gals)*	1200.00

**If container not labeled use delete key to clear the cell.*

**Note: When available, the labeled container volume is used in the calculations.*

Volume Displacement from Tanks and Other Obstructions

Tank ID	Tank Contents	Tank Shape	Tank Orientation	Diameter Height if Rect. Tank (ft)	Length Weld to Weld if Bullet (ft)	Width Rect. Tanks Only (ft)	Volume (gals)	Volume of Secondary Containment Displaced (gals)
		Cylinder	non-elevated, vertical					
		Rectangular	non-elevated, vertical					
		Rectangular	non-elevated, vertical					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					

Enter displacement from other obstructions, in gallons (1 ft^3 = 7.481 gallons):
Describe Obstructions:

Summary

Containment Capacity (gals)	143
Volume Displaced by Rainfall (gals)	83
Volume Displaced by Tanks & Obstructions (gals)	0
Berm Volume Less Tank & Rainfall Displacement (gals)	60
Largest Tank Capacity (gals)	1,200
% of Largest Tank Volume Contained	5%

Result must equal 100% or greater to allow for adequate precipitation from 25 yr, 24-hr rainfall.

7.0 ADDITIONAL DOCUMENTATION, CONTINUED

Click to view/print Roosevelt GP L-2 Secondary Containment

Secondary Containment (Berm) Volume Calculations
Roosevelt Gas Plant L-2 Containment

Volume of Containment Structure

Berm Type	Rectangular, No Taper	Under Building
Height (ft)	0.88	
Width (ft)	8.00	
Length (ft)	20.00	

Containment Volume (gals) 1,047.27

Additional Containment Volume from Below-Grade Sump

Sump Shape	(none)
Length (ft)	
Width (ft)	
Depth (ft)	
Calculated Volume (gals)	

Additional Containment Volume - Manual Input

Enter Volume (gals)	
Describe Additional Vol:	

Freeboard Standard: 110% of Largest Tank Volume

Enter 0 in cell at right	0
Volume Displaced (gals)	0.00

Largest Tank Volume Calculations

Tank ID	L-2	
Tank Contents	Lube Oil	
Tank Shape	Bullet	
Tank Orientation	Horizontal	
Diameter (ft)	4.00	
Length Weld to Weld (ft)	8.00	
Calculated Volume (gals)	1002.70	
Labeled Volume (gals)*	1000.00	*If container not labeled use delete key to clear the cell.*

**Note: When available, the labeled container volume is used in the calculations.*

Volume Displacement from Tanks and Other Obstructions

Tank ID	Tank Contents	Tank Shape	Tank Orientation	Diameter Height if Rect. Tank (ft)	Length Weld to Weld if Bullet (ft)	Width Rect. Tanks Only (ft)	Volume (gals)	Volume of Secondary Containment Displaced (gals)
		Cylinder	non-elevated, vertical					
		Rectangular	non-elevated, vertical					
		Rectangular	non-elevated, vertical					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					

Enter displacement from other obstructions, in gallons (1 ft^3 = 7.481 gallons):
Describe Obstructions:

Summary

Containment Capacity (gals)	1,047	
Volume Displaced by Rainfall (gals)	0	
Volume Displaced by Tanks & Obstructions (gals)	0	
Berm Volume Less Tank & Rainfall Displacement (gals)	1,047	
Largest Tank Capacity (gals)	1,000	
% of Largest Tank Volume Contained	105%	*Result must be 110% or greater to allow for adequate precipitation.*

7.0 ADDITIONAL DOCUMENTATION, CONTINUED

Click to view/print Roosevelt GP Transformer-1 Secondary Containment

Secondary Containment (Berm) Volume Calculations
Roosevelt Gas Plant Transformer-1 Containment

Volume of Containment Structure

Berm Type	Rectangular, No Taper
Height (ft)	1.00
Width (ft)	10.00
Length (ft)	10.00

Containment Volume (gals)	748.05

Additional Containment Volume from Below-Grade Sump

Sump Shape	(none)
Length (ft)	
Width (ft)	
Depth (ft)	
Calculated Volume (gals)	

Additional Containment Volume - Manual Input

Enter Volume (gals)	
Describe Additional Vol:	

Freeboard Standard: 25 yr, 24-hr Rainfall (in)

25 yr, 24-hr Rainfall (in)	3.5
Volume Displaced (gals)	218.18

Largest Tank Volume Calculations

Tank ID	Transformer-1	
Tank Contents	Mineral Oil	
Tank Shape	Rectangular	
Tank Orientation	Horizontal	
Height (ft)	5.00	
Length (ft)	8.00	
Width (ft)	6.00	
Calculated Volume (gals)	1795.32	
Labeled Volume (gals)*	650.00	*If container not labeled use delete key to clear the cell.*

**Note: When available, the labeled container volume is used in the calculations.*

Volume Displacement from Tanks and Other Obstructions

Tank ID	Tank Contents	Tank Shape	Tank Orientation	Diameter Height if Rect. Tank (ft)	Length Weld to Weld if Bullet (ft)	Width Rect. Tanks Only (ft)	Volume (gals)	Volume of Secondary Containment Displaced (gals)
		Rectangular	non-elevated, vertical					
		Rectangular	non-elevated, vertical					
		Rectangular	non-elevated, vertical					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
			Enter displacement from other obstructions, in gallons (1 ft^3 = 7.481 gallons):					
			Describe Obstructions:					

Summary

Containment Capacity (gals)	748
Volume Displaced by Rainfall (gals)	218
Volume Displaced by Tanks & Obstructions (gals)	0
Berm Volume Less Tank & Rainfall Displacement (gals)	530
Largest Tank Capacity (gals)	650
% of Largest Tank Volume Contained	82%

Result must equal 100% or greater to allow for adequate precipitation from 25 yr, 24-hr rainfall.

7.0 ADDITIONAL DOCUMENTATION, CONTINUED

Click to view/print Roosevelt GP Transformer-3,4,5 Secondary Containment

Secondary Containment (Berm) Volume Calculations
Roosevelt Gas Plant Transformer-3,4,5 Containment

Volume of Containment Structure

Berm Type	Rectangular, No Taper
Height (ft)	0.67
Width (ft)	9.00
Length (ft)	37.00

Containment Volume (gals)	1,660.67

Additional Containment Volume from Below-Grade Sump

Sump Shape	(none)
Length (ft)	
Width (ft)	
Depth (ft)	
Calculated Volume (gals)	

Additional Containment Volume - Manual Input

Enter Volume (gals)	
Describe Additional Vol:	

Freeboard Standard: 25 yr, 24-hr Rainfall (in)

25 yr, 24-hr Rainfall (in)	3.5
Volume Displaced (gals)	726.54

Largest Tank Volume Calculations

Tank ID	Transformer-3	
Tank Contents	Mineral Oil	
Tank Shape	Rectangular	
Tank Orientation	Horizontal	
Height (ft)	5.00	
Length (ft)	7.00	
Width (ft)	5.00	
Calculated Volume (gals)	1309.09	
Labeled Volume (gals)*	625.00	*If container not labeled use delete key to clear the cell.*

**Note: When available, the labeled container volume is used in the calculations.*

Volume Displacement from Tanks and Other Obstructions

Tank ID	Tank Contents	Tank Shape	Tank Orientation	Diameter Height if Rect. Tank (ft)	Length Weld to Weld if Bullet (ft)	Width Rect. Tanks Only (ft)	Volume (gals)	Volume of Secondary Containment Displaced (gals)
Tranformer-4	Mineral Oil	Rectangular	non-elevated, vertical	5.00	7.00	5.00	1309.09	174.55
Transformer-5	Mineral Oil	Rectangular	non-elevated, vertical	5.00	7.00	5.00		174.55
		Rectangular	non-elevated, vertical					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					

Enter displacement from other obstructions, in gallons (1 ft^3 = 7.481 gallons):
Describe Obstructions:

Summary

Containment Capacity (gals)	1,661
Volume Displaced by Rainfall (gals)	727
Volume Displaced by Tanks & Obstructions (gals)	349
Berm Volume Less Tank & Rainfall Displacement (gals)	585
Largest Tank Capacity (gals)	625
% of Largest Tank Volume Contained	94%

Result must equal 100% or greater to allow for adequate precipitation from 25 yr, 24-hr rainfall.

7.0 ADDITIONAL DOCUMENTATION, CONTINUED

Click to view/print Roosevelt GP Transformer-6,7 Secondary Containment

Secondary Containment (Berm) Volume Calculations
Roosevelt Gas Plant Transformer-6,7 Containment

Volume of Containment Structure

Berm Type	Rectangular, No Taper
Height (ft)	1.42
Width (ft)	18.50
Length (ft)	40.00

Containment Volume (gals)	7,842.06

Additional Containment Volume from Below-Grade Sump

Sump Shape	(none)
Length (ft)	
Width (ft)	
Depth (ft)	
Calculated Volume (gals)	

Additional Containment Volume - Manual Input

Enter Volume (gals)	
Describe Additional Vol:	

Freeboard Standard: 25 yr, 24-hr Rainfall (in)

25 yr, 24-hr Rainfall (in)	3.5
Volume Displaced (gals)	1614.54

Largest Tank Volume Calculations

Tank ID	Transformer-6	
Tank Contents	Mineral Oil	
Tank Shape	Rectangular	
Tank Orientation	Horizontal	
Height (ft)	5.00	
Length (ft)	10.00	
Width (ft)	5.00	
Calculated Volume (gals)	1870.13	
Labeled Volume (gals)*	1000.00	**If container not labeled use delete key to clear the cell.*

**Note: When available, the labeled container volume is used in the calculations.*

Volume Displacement from Tanks and Other Obstructions

Tank ID	Tank Contents	Tank Shape	Tank Orientation	Diameter Height if Rect. Tank (ft)	Length Weld to Weld if Bullet (ft)	Width Rect. Tanks Only (ft)	Volume (gals)	Volume of Secondary Containment Displaced (gals)
Tranformer-4	Mineral Oil	Rectangular	non-elevated, vertical	5.00	10.00	5.00	1870.13	529.87
Transformer-5	Mineral Oil	Rectangular	non-elevated, vertical	5.00	10.00	5.00	1870.13	529.87
		Rectangular	non-elevated, vertical					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					
		(none)	(none)					

Enter displacement from other obstructions, in gallons (1 ft^3 = 7.481 gallons):
Describe Obstructions:

Summary

Containment Capacity (gals)	7,842
Volume Displaced by Rainfall (gals)	1,615
Volume Displaced by Tanks & Obstructions (gals)	1,060
Berm Volume Less Tank & Rainfall Displacement (gals)	5,168
Largest Tank Capacity (gals)	1,000
% of Largest Tank Volume Contained	517%

Result must equal 100% or greater to allow for adequate precipitation from 25 yr, 24-hr rainfall.

Attachment 4: Erosion Control Plan

Erosion control measures will be addressed in the Stormwater Pollution Prevention Plan (SWPPP) which will be developed to satisfy the ND DoH Construction Stormwater Permit. HILAND will obtain a construction stormwater permit for the expansion activities.

Attachment 5: Risk Management Plan

Section 1. Registration Information

1.1 Source Identification	
1.1.a. Facility Name	Roosevelt Plant
1.1.b. Parent Company #1 Name	Hiland Partners Holdings, LLP
1.1.c. Parent Company #2 Name	Kinder Morgan, Inc.
1.2 EPA Facility Identifier	100000231457
1.3 Other EPA Systems Facility Identifier	
1.4 Dun and Bradstreet Numbers (DUNS)	
1.4.a. Facility DUNS	
1.4.b. Parent Company #1 DUNS	169105199
1.4.c. Parent Company #2 DUNS	800408192
1.5 Facility Location	
1.5.a. Street - Line 1	12527 Spring Creek Road
1.5.b. Street - Line 2	
1.5.c. City	Watford City
1.5.d. State	ND
1.5.e. Zip Code - Zip +4 Code	58854
1.5.f. County	MCKENZIE
1.5.g. Facility Latitude (in decimal degrees)	47.689722
1.5.h. Facility Longitude (in decimal degrees)	-103.27
1.5.i. Method for determining Lat/Long	GPS - Unspecified
1.5.j. Description of location identified by Lat/Long	Administrative Building
1.5.k. Horizontal Accuracy Measure (meters)	3
1.5.l. Horizontal Reference Datum Code	World Geodetic System of 1984
1.5.m. Source Map Scale Number	
1.6 Owner or Operator	
1.6.a. Name	Hiland Partners Holdings, LLP
1.6.b. Phone	(713) 369-9000
1.6.c. Street - Line 1	1001 Louisiana
1.6.d. Street - Line 2	Suite 1000
1.6.e. City	Houston
1.6.f. State	TX
1.6.g. Zip Code - Zip +4 Code	77002
Foreign Country	
Foreign State/Province	
Foreign Zip/Postal Code	
1.7 Name, title and email address of person or position responsible for RMP (part 68) implementation	
1.7.a. Name of person	George Stuckers
1.7.b. Title of person or position	Manager - Operations
1.7.c. Email address of person or position	george_stuckers@kindermorgan.com

Section 1. Registration Information

1.8 Emergency Contact	
1.8.a. Name	George Stuckers
1.8.b. Title of person or position	Manager - Operations
1.8.c. Phone	(701) 609-2461
1.8.d. 24-Hour Phone	(701) 609-2461
1.8.e. 24-Hour Phone Extension/PIN #	
1.8.f. Email address for emergency contact	george_stuckers@kindermorgan.com
1.9 Other Points of Contact	
1.9.a. Facility or Parent Company E-mail Address	
1.9.b. Facility Public Contact Phone Number	(701) 444-5060
1.9.c. Facility or Parent Company WWW Homepage Address	
1.10 Local Emergency Planning Committee (LEPC)	Mckenzie County LEPC
1.11 Number of fulltime equivalent (FTEs) employees on site	5
1.12 Covered by	
1.12.a. OSHA PSM	Y
1.12.b. EPCRA section 302	
1.12.c. CAA Title V Air Operating Permit Program	
1.12.d. Air Operating Permit ID #	
1.13 OSHA Star or Merit Ranking	
1.14 Last Safety Inspection (by an External Agency) Date	
1.15 Last Safety Inspection Performed by an External Agency	Never had one
1.16 Will this RMP involve Predictive Filing?	
1.18 RMP Preparer Information	
1.18.a. Name	
1.18.b. Phone	
1.18.c. Street - Line 1	
1.18.d. Street - Line 2	
1.18.e. City	
1.18.f. State	
1.18.g. Zip	
Foreign Country	
Foreign State/Province	
Foreign Zip Code	

Section 1. Registration Information

Section 1.17 Process Specific Information

Process 1

Process ID #	1000073245		
Process Description	NGL processing		
1.17.a. Program Level	3		
1.17.b. NAICS Code(s)			
211112 (Natural Gas Liquid Extraction)			
1.17.c. Chemical(s)			
	Chemical Name	CAS Number	Quantity
	Flammable Mixture	00-11-11	180000

Chemicals in Flammable Mixture	CAS Number of Chemical in Mixture
Ethane	74-84-0
Isobutane [Propane, 2-methyl]	75-28-5
Isopentane [Butane, 2-methyl-]	78-78-4
Methane	74-82-8
Pentane	109-66-0
Butane	106-97-8
Propane	74-98-6

Section 1. Registration Information

Section 1.17 Process Specific Information

Process 2

Process ID #	1000073246		
Process Description	NGL Storage		
1.17.a. Program Level	3		
1.17.b. NAICS Code(s)			
211112 (Natural Gas Liquid Extraction)			
1.17.c. Chemical(s)			
	Chemical Name	CAS Number	Quantity
	Flammable Mixture	00-11-11	1053222

Chemicals in Flammable Mixture	CAS Number of Chemical in Mixture
Pentane	109-66-0
Propane	74-98-6
Butane	106-97-8
Ethane	74-84-0
Isobutane [Propane, 2-methyl]	75-28-5
Isopentane [Butane, 2-methyl-]	78-78-4

Section 1. Registration Information

Section 1.17 Process Specific Information

Process 3

Process ID #	1000073247		
Process Description	Propane refrigeration		
1.17.a. Program Level	3		
1.17.b. NAICS Code(s)			
211112 (Natural Gas Liquid Extraction)			
1.17.c. Chemical(s)			
	Chemical Name	CAS Number	Quantity
	Propane	74-98-6	43982

Section 4. Flammables: Worst Case

Scenario 1

Process Name	NGL Storage
Chemical	Flammable Mixture
4.1.a. Chemical Name	Flammable Mixture
4.2 Model Used	EPA's RMP*Comp(TM)
4.3 Scenario	Vapor Cloud Explosion
4.4 Quantity Released (lbs)	351074
4.5 Endpoint Used	1 PSI
4.6 Distance to endpoint (miles)	0.6
4.7 Estimated residential population within distance to endpoint (numbers)	4
4.8 Public receptors within distance to endpoint	
4.8.a. Schools	
4.8.b. Residences	Y
4.8.c. Hospitals	
4.8.d. Prison/Correctional Facilities	
4.8.e. Recreational Areas	
4.8.f. Major commercial, office or industrial areas	Y
4.8.g. Other	
4.9 Environmental receptors within distance to endpoint	
4.9.a. National or State Parks, Forests or Monuments	
4.9.b. Officially Designated Wildlife Sanctuaries, Preserves or Refuges	
4.9.c. Federal Wilderness Area	
4.9.d. Other	
4.10 Passive mitigation considered	
4.10.a. Blast Walls	
4.10.b. Other	
4.11 Graphic file	

Section 5. Flammables: Alternative Release

Scenario 1

Process Name	NGL processing
Chemical	Flammable Mixture
5.1.a. Chemical Name	Flammable Mixture
5.2 Model Used	EPA's RMP*Comp(TM)
5.3 Scenario	Vapor Cloud Explosion
5.4 Quantity Released (lbs)	9543
5.5 Endpoint Used	1 PSI
5.6 Distance to endpoint (miles)	0.2
5.7 Estimated residential population within distance to endpoint (numbers)	0
5.8 Public receptors within distance to endpoint	
5.8.a. Schools	
5.8.b. Residences	
5.8.c. Hospitals	
5.8.d. Prison/Correctional Facilities	
5.8.e. Recreational Areas	
5.8.f. Major commercial, office or industrial areas	Y
5.8.g. Other	
5.9 Environmental receptors within distance to endpoint	
5.9.a. National or State Parks, Forests or Monuments	
5.9.b. Officially Designated Wildlife Sanctuaries, Preserves or Refuges	
5.9.c. Federal Wilderness Area	
5.9.d. Other	
5.10 Passive mitigation considered	
5.10.a. Dikes	Y
5.10.b. Fire walls	
5.10.c. Blast walls	
5.10.d. Enclosures	
5.10.e. Other	
5.11 Active mitigation considered	
5.11.a. Sprinkler systems	
5.11.b. Deluge systems	
5.11.c. Water curtain	
5.11.d. Excess flow valve	
5.11.e. Other	
5.12 Graphic file	

Section 7. Prevention Program: Program Level 3

Program 1

Prevention Program Description:	
7.1 NAICS Code for process	
7.1.a. Process Name	1000073247 (Propane refrigeration)
7.1.b. NAICS	211112 (Natural Gas Liquid Extraction)
7.2 Chemicals	
Propane	
7.3 Date on which the safety information was last reviewed or revised	12/11/2015
7.4 Process Hazard Analysis (PHA)	
7.4.a. Date of last PHA or PHA update	12/01/2015
7.4.b. Technique used	
7.4.b.1. What if	
7.4.b.2. Checklist	
7.4.b.3. What if/Checklist Combined	Y
7.4.b.4. HAZOP	
7.4.b.5. Failure mode & effects analysis	
7.4.b.6. Fault tree analysis	
7.4.b.7. Other	
7.4.c. Expected or actual date of completion of all changes resulting from last PHA or PHA update	06/09/2016
7.4.d. Major hazards identified	
7.4.d.1. Toxic release	
7.4.d.2. Fire	Y
7.4.d.3. Explosion	Y
7.4.d.4. Runaway reaction	
7.4.d.5. Polymerization	
7.4.d.6. Overpressurization	Y
7.4.d.7. Corrosion	Y
7.4.d.8. Overfilling	Y
7.4.d.9. Contamination	
7.4.d.10. Equipment failure	
7.4.d.11. Loss of cooling, heating, electricity, instrument air	Y
7.4.d.12. Earthquake	
7.4.d.13. Floods	
7.4.d.14. Tornado	
7.4.d.15. Hurricanes	
7.4.d.16. Other	
7.4.e. Process controls in use	
7.4.e.1. Vents	Y
7.4.e.2. Relief valves	Y
7.4.e.3. Check valves	Y
7.4.e.4. Scrubbers	
7.4.e.5. Flares	Y

Section 7. Prevention Program: Program Level 3

7.4.e.6. Manual shutoffs	Y
7.4.e.7. Automatic shutoffs	Y
7.4.e.8. Interlocks	
7.4.e.9. Alarms and procedures	Y
7.4.e.10. Keyed bypass	
7.4.e.11. Emergency air supply	
7.4.e.12. Emergency power	
7.4.e.13. Backup pump	Y
7.4.e.14. Grounding equipment	Y
7.4.e.15. Inhibitor additions	
7.4.e.16. Rupture disks	
7.4.e.17. Excess flow device	Y
7.4.e.18. Quench system	
7.4.e.19. Purge system	
7.4.e.20. None	
7.4.e.21. Other	
7.4.f. Mitigation systems in use	
7.4.f.1. Sprinkler system	
7.4.f.2. Dikes	Y
7.4.f.3. Fire walls	Y
7.4.f.4. Blast walls	
7.4.f.5. Deluge system	
7.4.f.6. Water curtain	
7.4.f.7. Enclosure	
7.4.f.8. Neutralization	
7.4.f.9. None	
7.4.f.10. Other	
7.4.g. Monitoring/detection systems in use	
7.4.g.1. Process area detectors	Y
7.4.g.2. Perimeter monitors	Y
7.4.g.3. None	
7.4.g.4. Other	
7.4.h. Changes since last PHA update	
7.4.h.1. Reduction in chemical inventory	
7.4.h.2. Increase in chemical inventory	
7.4.h.3. Change in process parameters	
7.4.h.4. Installation of process controls	
7.4.h.5. Installation of process detection systems	
7.4.h.6. Installation of perimeter monitoring systems	
7.4.h.7. Installation of mitigation systems	
7.4.h.8. None recommended	
7.4.h.9. None	Y
7.4.h.10. Other	
7.5 Date of most recent review or revision of operating procedures	01/18/2017

Section 7. Prevention Program: Program Level 3

7.6 Training	
7.6.a. Date of most recent review or revision of training programs	12/11/2015
7.6.b. Type of training provided	
7.6.b.1. Classroom	Y
7.6.b.2. On the job	Y
7.6.b.3. Other	Computer-based training
7.6.c. Type of competency testing used	
7.6.c.1. Written test	Y
7.6.c.2. Oral test	Y
7.6.c.3. Demonstration	
7.6.c.4. Observation	
7.6.c.5. Other	
7.7 Maintenance	
7.7.a. Date of most recent review or revision of maintenance procedures	12/11/2015
7.7.b. Date of most recent equipment inspection or test	11/21/2016
7.7.c. Equipment most recently inspected or tested (equipment list)	MI inspections of piping and vessels
7.8 Management of change	
7.8.a. Date of most recent changes that triggered management of change procedures	06/09/2017
7.8.b. Date of most recent review or revision of management of change procedures	05/02/2017
7.9 Date of most recent pre-startup review	09/23/2016
7.10 Compliance audits	
7.10.a. Date of most recent compliance audits	12/11/2015
7.10.b. Expected or actual date of completion of all changes resulting from the most recent compliance audits	12/11/2015
7.11 Incident investigation	
7.11.a. Date of most recent incident investigation	06/07/2017
7.11.b. Expected or actual date of completion of all changes resulting from the incident investigation	08/07/2017
7.12 Date of most recent review or revision of employee participation plans	12/15/2015
7.13 Date of most recent review or revision of hot work permit procedures	12/15/2015
7.14 Date of most recent review or revision of contractor safety procedures	12/01/2015
7.15 Date of most recent evaluation of contractor safety performance	08/24/2016

Section 7. Prevention Program: Program Level 3

Program 2

Prevention Program Description: NGL Storage	
7.1 NAICS Code for process	
7.1.a. Process Name	1000073246 (NGL Storage)
7.1.b. NAICS	211112 (Natural Gas Liquid Extraction)
7.2 Chemicals	
Flammable Mixture	
7.3 Date on which the safety information was last reviewed or revised	12/11/2015
7.4 Process Hazard Analysis (PHA)	
7.4.a. Date of last PHA or PHA update	12/01/2015
7.4.b. Technique used	
7.4.b.1. What if	
7.4.b.2. Checklist	
7.4.b.3. What if/Checklist Combined	Y
7.4.b.4. HAZOP	
7.4.b.5. Failure mode & effects analysis	
7.4.b.6. Fault tree analysis	
7.4.b.7. Other	
7.4.c. Expected or actual date of completion of all changes resulting from last PHA or PHA update	05/31/2016
7.4.d. Major hazards identified	
7.4.d.1. Toxic release	
7.4.d.2. Fire	Y
7.4.d.3. Explosion	Y
7.4.d.4. Runaway reaction	
7.4.d.5. Polymerization	
7.4.d.6. Overpressurization	Y
7.4.d.7. Corrosion	Y
7.4.d.8. Overfilling	Y
7.4.d.9. Contamination	
7.4.d.10. Equipment failure	
7.4.d.11. Loss of cooling, heating, electricity, instrument air	Y
7.4.d.12. Earthquake	
7.4.d.13. Floods	
7.4.d.14. Tornado	
7.4.d.15. Hurricanes	
7.4.d.16. Other	
7.4.e. Process controls in use	
7.4.e.1. Vents	Y
7.4.e.2. Relief valves	Y
7.4.e.3. Check valves	Y
7.4.e.4. Scrubbers	
7.4.e.5. Flares	Y

Section 7. Prevention Program: Program Level 3

7.4.e.6. Manual shutoffs	Y
7.4.e.7. Automatic shutoffs	Y
7.4.e.8. Interlocks	
7.4.e.9. Alarms and procedures	Y
7.4.e.10. Keyed bypass	
7.4.e.11. Emergency air supply	
7.4.e.12. Emergency power	Y
7.4.e.13. Backup pump	Y
7.4.e.14. Grounding equipment	Y
7.4.e.15. Inhibitor additions	
7.4.e.16. Rupture disks	
7.4.e.17. Excess flow device	Y
7.4.e.18. Quench system	
7.4.e.19. Purge system	
7.4.e.20. None	
7.4.e.21. Other	
7.4.f. Mitigation systems in use	
7.4.f.1. Sprinkler system	
7.4.f.2. Dikes	Y
7.4.f.3. Fire walls	Y
7.4.f.4. Blast walls	
7.4.f.5. Deluge system	
7.4.f.6. Water curtain	
7.4.f.7. Enclosure	
7.4.f.8. Neutralization	
7.4.f.9. None	
7.4.f.10. Other	
7.4.g. Monitoring/detection systems in use	
7.4.g.1. Process area detectors	Y
7.4.g.2. Perimeter monitors	Y
7.4.g.3. None	
7.4.g.4. Other	
7.4.h. Changes since last PHA update	
7.4.h.1. Reduction in chemical inventory	
7.4.h.2. Increase in chemical inventory	
7.4.h.3. Change in process parameters	
7.4.h.4. Installation of process controls	
7.4.h.5. Installation of process detection systems	
7.4.h.6. Installation of perimeter monitoring systems	
7.4.h.7. Installation of mitigation systems	
7.4.h.8. None recommended	
7.4.h.9. None	Y
7.4.h.10. Other	
7.5 Date of most recent review or revision of operating procedures	01/18/2017

Section 7. Prevention Program: Program Level 3

7.6 Training	
7.6.a. Date of most recent review or revision of training programs	12/01/2015
7.6.b. Type of training provided	
7.6.b.1. Classroom	Y
7.6.b.2. On the job	Y
7.6.b.3. Other	Computer-based training
7.6.c. Type of competency testing used	
7.6.c.1. Written test	Y
7.6.c.2. Oral test	
7.6.c.3. Demonstration	Y
7.6.c.4. Observation	
7.6.c.5. Other	
7.7 Maintenance	
7.7.a. Date of most recent review or revision of maintenance procedures	12/11/2015
7.7.b. Date of most recent equipment inspection or test	11/21/2016
7.7.c. Equipment most recently inspected or tested (equipment list)	MI inspections of vessels and piping
7.8 Management of change	
7.8.a. Date of most recent changes that triggered management of change procedures	06/09/2017
7.8.b. Date of most recent review or revision of management of change procedures	05/02/2017
7.9 Date of most recent pre-startup review	09/23/2016
7.10 Compliance audits	
7.10.a. Date of most recent compliance audits	12/11/2015
7.10.b. Expected or actual date of completion of all changes resulting from the most recent compliance audits	12/11/2015
7.11 Incident investigation	
7.11.a. Date of most recent incident investigation	06/07/2017
7.11.b. Expected or actual date of completion of all changes resulting from the incident investigation	08/07/2017
7.12 Date of most recent review or revision of employee participation plans	12/15/2015
7.13 Date of most recent review or revision of hot work permit procedures	12/15/2015
7.14 Date of most recent review or revision of contractor safety procedures	12/01/2015
7.15 Date of most recent evaluation of contractor safety performance	08/24/2016

Section 7. Prevention Program: Program Level 3

Program 3

Prevention Program Description: NGL processing.	
7.1 NAICS Code for process	
7.1.a. Process Name	1000073245 (NGL processing)
7.1.b. NAICS	211112 (Natural Gas Liquid Extraction)
7.2 Chemicals	
Flammable Mixture	
7.3 Date on which the safety information was last reviewed or revised	12/14/2015
7.4 Process Hazard Analysis (PHA)	
7.4.a. Date of last PHA or PHA update	07/19/2016
7.4.b. Technique used	
7.4.b.1. What if	
7.4.b.2. Checklist	
7.4.b.3. What if/Checklist Combined	Y
7.4.b.4. HAZOP	Y
7.4.b.5. Failure mode & effects analysis	
7.4.b.6. Fault tree analysis	
7.4.b.7. Other	
7.4.c. Expected or actual date of completion of all changes resulting from last PHA or PHA update	08/31/2016
7.4.d. Major hazards identified	
7.4.d.1. Toxic release	
7.4.d.2. Fire	Y
7.4.d.3. Explosion	Y
7.4.d.4. Runaway reaction	
7.4.d.5. Polymerization	
7.4.d.6. Overpressurization	Y
7.4.d.7. Corrosion	Y
7.4.d.8. Overfilling	Y
7.4.d.9. Contamination	
7.4.d.10. Equipment failure	Y
7.4.d.11. Loss of cooling, heating, electricity, instrument air	Y
7.4.d.12. Earthquake	
7.4.d.13. Floods	
7.4.d.14. Tornado	
7.4.d.15. Hurricanes	
7.4.d.16. Other	
7.4.e. Process controls in use	
7.4.e.1. Vents	Y
7.4.e.2. Relief valves	Y
7.4.e.3. Check valves	Y
7.4.e.4. Scrubbers	
7.4.e.5. Flares	Y

Section 7. Prevention Program: Program Level 3

7.4.e.6. Manual shutoffs	Y
7.4.e.7. Automatic shutoffs	Y
7.4.e.8. Interlocks	
7.4.e.9. Alarms and procedures	Y
7.4.e.10. Keyed bypass	
7.4.e.11. Emergency air supply	
7.4.e.12. Emergency power	Y
7.4.e.13. Backup pump	Y
7.4.e.14. Grounding equipment	Y
7.4.e.15. Inhibitor additions	
7.4.e.16. Rupture disks	Y
7.4.e.17. Excess flow device	Y
7.4.e.18. Quench system	
7.4.e.19. Purge system	
7.4.e.20. None	
7.4.e.21. Other	
7.4.f. Mitigation systems in use	
7.4.f.1. Sprinkler system	
7.4.f.2. Dikes	Y
7.4.f.3. Fire walls	Y
7.4.f.4. Blast walls	
7.4.f.5. Deluge system	
7.4.f.6. Water curtain	
7.4.f.7. Enclosure	
7.4.f.8. Neutralization	
7.4.f.9. None	
7.4.f.10. Other	
7.4.g. Monitoring/detection systems in use	
7.4.g.1. Process area detectors	Y
7.4.g.2. Perimeter monitors	Y
7.4.g.3. None	
7.4.g.4. Other	
7.4.h. Changes since last PHA update	
7.4.h.1. Reduction in chemical inventory	
7.4.h.2. Increase in chemical inventory	
7.4.h.3. Change in process parameters	
7.4.h.4. Installation of process controls	
7.4.h.5. Installation of process detection systems	
7.4.h.6. Installation of perimeter monitoring systems	
7.4.h.7. Installation of mitigation systems	
7.4.h.8. None recommended	
7.4.h.9. None	Y
7.4.h.10. Other	
7.5 Date of most recent review or revision of operating procedures	01/18/2017

Section 7. Prevention Program: Program Level 3

7.6 Training	
7.6.a. Date of most recent review or revision of training programs	12/11/2015
7.6.b. Type of training provided	
7.6.b.1. Classroom	Y
7.6.b.2. On the job	Y
7.6.b.3. Other	Computer-based training
7.6.c. Type of competency testing used	
7.6.c.1. Written test	Y
7.6.c.2. Oral test	
7.6.c.3. Demonstration	Y
7.6.c.4. Observation	
7.6.c.5. Other	
7.7 Maintenance	
7.7.a. Date of most recent review or revision of maintenance procedures	12/11/2015
7.7.b. Date of most recent equipment inspection or test	11/21/2016
7.7.c. Equipment most recently inspected or tested (equipment list)	API 510 and 570 external inspections of pressure vessels and piping
7.8 Management of change	
7.8.a. Date of most recent changes that triggered management of change procedures	06/09/2017
7.8.b. Date of most recent review or revision of management of change procedures	05/02/2017
7.9 Date of most recent pre-startup review	09/23/2016
7.10 Compliance audits	
7.10.a. Date of most recent compliance audits	12/11/2015
7.10.b. Expected or actual date of completion of all changes resulting from the most recent compliance audits	12/11/2015
7.11 Incident investigation	
7.11.a. Date of most recent incident investigation	06/07/2017
7.11.b. Expected or actual date of completion of all changes resulting from the incident investigation	08/07/2017
7.12 Date of most recent review or revision of employee participation plans	12/15/2015
7.13 Date of most recent review or revision of hot work permit procedures	12/01/2015
7.14 Date of most recent review or revision of contractor safety procedures	12/01/2015
7.15 Date of most recent evaluation of contractor safety performance	08/24/2016

Section 9. Emergency Response

9.1 Written emergency response (ER) plan	
9.1.a. Is your facility included in the written community emergency response plan?	
9.1.b. Does your facility have its own written emergency response plan?	Y
9.2 Does your facility's ER plan include specific actions to be taken in response to accidental releases of regulated substances?	Y
9.3 Does your facility's ER plan include procedures for informing the public and local agencies responding to accidental releases?	Y
9.4 Does your facility's ER plan include information on emergency health care?	Y
9.5 Date of most recent review or update of your facility's ER plan	04/25/2017
9.6 Date of most recent ER training for your facility's employees	01/04/2017
9.7 Local agency with which your facility's ER plan or response activities are coordinated	
9.7.a. Name of agency	Watford City Volunteer Fire Dept.
9.7.b. Phone number	(701) 842-2934
9.8 Subject to	
9.8.a. OSHA Regulations at 29 CFR 1910.38	Y
9.8.b. OSHA Regulations at 29 CFR 1910.120	Y
9.8.c. Clean Water Act Regulations at 40 CFR 112	Y
9.8.d. RCRA Regulations at 40 CFR 264, 265, 279.52	
9.8.e. OPA-90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, 30 CFR 254	
9.8.f. State EPCRA Rules of Laws	
9.8.g. Other	

Executive Summary

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At the Roosevelt Gas Plant we are committed to operating in a manner that is safe for our workers, the public and the environment. As part of this commitment we have established a system to promote the safe operation at this facility. One component of this system is a Risk Management Program (RMP) that helps manage the risks at this facility and complies with the requirements of the Environmental Protection Agency's (EPA) regulation 40 CFR Part 68, Accidental Release Prevention Requirements: Risk Management Programs (the RMP rule).

The RMP at this facility consists of three (3) elements:

1. A hazard assessment to help understand:
The potential offsite consequences of hypothetical accidental releases; and
Accidents that have occurred during the last 5 years associated with the use substances regulated by the RMP rule (regulated substances).

2. A prevention program to help maintain and safely operate the processes containing more than a threshold quantity of a regulated substance (covered processes).

3. An emergency response program to help respond to accidental releases of regulated substances from covered processes.

This facility has a comprehensive safety program in place establishing many levels of safeguards or controls against release of a hazardous substance and injuries and damage to its employees, the public and the environment. We limit the use of hazardous substances. Before using a hazardous substance, less hazardous alternatives are considered. When a hazardous substance is used, consideration is given to the potential for this substance to adversely affect our workers, the public and the environment, and we take steps to prevent any such effects.

The safety program consists of a number of elements, only some of which are required by the RMP rule. There are other prevention programs that are company specific and those required by the Department of Transportation under parts 192 or 195 and OSHA under the PSM regulation. The RMP Plan is primarily intended to describe those parts of the safety program at this facility that are required by the RMP rule.

ACCIDENTAL RELEASE

We are committed to the safety of workers and the public, and the preservation of the environment, through the prevention of accidental releases of hazardous substances. This facility implements reasonable prevention programs to prevent foreseeable releases of hazardous substances. These controls include training programs for personnel; programs to help ensure safety in the design, installation, operation, and maintenance of processes; and programs to evaluate the hazards at this facility.

In the event of an accidental release, we control and contain the release in a manner that will be safe for workers and will help prevent injury to the public or the environment. This facility coordinates response efforts with the local emergency response personnel.

REGULATED SUBSTANCES

This facility is primarily involved in the recovery of liquid hydrocarbons from a gas stream. As part of this process, we handle several regulated, flammable substances in sufficient quantities to be covered by the RMP rule. There are no such quantities of regulated toxic substances handled at the Plant. The following RMP-regulated flammables are found at the Plant:

Ethane

Methane

Propane

Iso-Butane

Butane

Iso-Pentane

Executive Summary

Pentane

PREVENTION PROGRAM

This facility uses a prevention program to help prevent accidental releases of hazardous substances. Beginning in 1994, this prevention program for processing of natural gas was formalized to comply with the 14 elements of the OSHA process safety management (PSM) prevention program. In 1996, the EPA RMP rule established two levels of prevention program requirements. Program 3 is essentially the same as OSHA PSM, except that the program also focuses on protecting the public and the environment. Our Program 3 prevention program, which applies to this plant, consists of the following 12 elements:

1. EMPLOYEE PARTICIPATION

We provide for participation by our employees in all aspects of our process operations. Employees are actively involved in the maintenance of our process safety programs.

2. PROCESS SAFETY INFORMATION

We maintain a variety of technical documents that are used to help ensure safe operation of our processes. These documents address:

a) Physical properties of hazardous substances handled
b) Operating parameters of the equipment- The engineering design documents include the operating parameters and the design basis and configuration of the equipment in each covered process. The available information includes:

1. Operating parameters
2. Simplified process flow diagrams
3. Maximum intended inventories
4. Safe upper and lower limits for parameters such as temperature, pressure or flow
5. Consequences of deviations from established operating limits
6. Design basis and configuration of equipment
7. Piping and instrument diagrams, including materials of construction
8. Electrical classification
9. Safety systems
10. Applicable design codes and standards
11. Design basis for relief and , if applicable, ventilation systems

c) Design basis and configuration of the equipment
d) Safety data sheets (SDSs) document the physical properties of hazardous substances handled, including regulated substances in covered processes. SDS for hazardous substances handled in each process are available in the Plant's SDS book so that personnel have ready reference to this information. The information available for each hazardous substance typically includes:

1. Toxicity information and permissible exposure limits
2. Physical data (e.g., boiling point, melting point, flash point)
3. Reactivity and corrosivity data
4. Thermal and chemical stability data
5. Hazards of mixing substances in the process.

3. PROCESS HAZARD ANALYSIS

This facility has a comprehensive program to help ensure that hazards associated with the covered processes are identified and controlled. Within this program, each process is systematically examined to identify hazards and ensure that adequate controls are in place to manage these hazards. The Hazard and Operability Study (HAZOP) analysis technique is the primary tool used to perform these evaluations. The analyses are conducted using a team of people who have operating and maintenance experience, as well as engineering expertise. This team identifies and evaluates hazards of the process, as well as accident prevention and mitigation measures, and the team makes suggestions for additional prevention and/or mitigation measures when the team believes such measures are necessary. The PHA team findings are forwarded to local and company corporate management for resolution. To help ensure that the process controls and/or process hazards do not eventually deviate significantly from the original design safety features, the plant updates and revalidates the hazard analysis results at least once every 5 years.

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4. OPERATING PROCEDURES

This facility maintains written operating procedures that address various modes of process operations. These procedures are used as a reference by experienced operators and provide a basis for consistent training of new operators. These procedures are periodically reviewed and annually certified as current and accurate. These procedures provide guidance on how to respond to upper or lower limit deviations for specific process or equipment parameters. This information, along with written operating procedures, is readily available to operators in the process unit and for other personnel to use as necessary to safely perform their job tasks.

5. TRAINING

To complement the written procedures for process operations, this facility has implemented a comprehensive training program for all employees involved in operating a process. New employees receive basic training in gas plant operations if they are not already familiar with such operations. After successfully completing this training, a new operator is paired with a qualified operator to learn process-specific duties and tasks. All of this training is documented for each operator, including the means used to verify that the operator understood the training. To ensure training is adequate and serves the safety of employees, operators are consulted with on the type and frequency of their training.

6. CONTRACTORS

This facility uses contractors to supplement its workforce during periods of increased maintenance or construction activities. Because some contractors work on or near process equipment, the plant has procedures in place to ensure that contractors:

a) perform their work in a safe manner
b) have the appropriate knowledge and skills
c) are aware of the hazards in their workplace
d) understand what they should do in the event of an emergency
e) understand and follow site safety rules
f) inform gas plant personnel of any hazards they find during their work

This is accomplished by providing contractors with a process overview, information about safety and health hazards, emergency response plan requirements, and safe work practices prior to their beginning work. In addition, Kinder Morgan evaluates contractor safety programs and their past performance before selection of a contractor is made. Facility personnel periodically monitor contractor performance to ensure that contractors are fulfilling their safety obligations.

7. PRE-STARTUP SAFETY REVIEWS (PSSR)

A PSSR is conducted at this facility for any major facility modifications that require a change in the process safety information. The purpose of the PSSR is to ensure that safety features, procedures, personnel, and equipment are appropriately prepared for startup prior to placing the equipment into service.

8. MECHANICAL INTEGRITY

This facility has well-established practices and procedures to maintain pressure vessels, piping systems, relief and vent systems, controls, pumps and compressors, and emergency shutdown systems and safety systems in a safe operating condition. Written procedures help ensure that work is performed in a consistent manner and provide a basis for training. Inspections and tests are performed to help ensure that equipment functions as intended and to verify that equipment is within acceptable limits (e.g., adequate wall thickness for pressure vessels). If a deficiency is identified, employees will correct the deficiency before placing the equipment back into service (if possible), or a management of change team will review the use of the equipment and determine what actions are necessary to ensure the safe operation of the equipment. Another integral part of the MI program is quality assurance. Quality assurance measures are incorporated into equipment purchases and repairs. This helps ensure that new equipment is suitable for its intended use and that proper materials and spare parts are used when repairs are made.

9. SAFE WORK PRACTICES

This facility has safe work practices in place to help ensure worker and process safety. Examples of

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these include; control of the entry/presence/exit of support personnel, a lockout/tagout procedure to ensure isolation of energy sources for equipment undergoing maintenance, a procedure for safe removal of hazardous substances before process piping or equipment is opened, a permit and procedure to control spark-producing activities (i.e., hot work), and a permit and procedure to ensure that adequate precautions are in place before entry into a confined space.

10. MANAGEMENT OF CHANGE

A comprehensive system to manage changes to all covered processes has been developed for this facility. This system requires that changes to items such as process equipment, chemicals, technology (including process operating conditions), procedures, and other facility changes be properly reviewed and authorized before being implemented. Affected hazard information, process operating limits, and equipment information, as well as procedures, are updated to incorporate these changes. In addition, operating and maintenance personnel are provided any necessary training on the change.

11. INCIDENT INVESTIGATION

Incidents are promptly investigated that result in, or reasonably could have resulted in, a fire/explosion, flammable gas release, major property damage, environmental loss, or personal injury. The goal of each investigation is to determine the facts and develop corrective actions to prevent a recurrence of the incident or a similar incident. The investigation team documents its findings, develops recommendations to prevent a recurrence, and forwards these results to gas plant management for resolution. Corrective actions taken in response to the investigation results are reviewed with all employees (including contractors) who could be affected by the findings. The final resolution if each finding or recommendation is documented, and the investigation results are reviewed with all employees (including contractors) who could be affected by the findings. Incident investigation reports are retained for at least five years so that the reports can be reviewed during future PHA revalidations.

12. COMPLIANCE AUDITS

To help ensure that the accident prevention program is functioning properly, this facility periodically conducts an audit to determine whether the procedures and practices required by the accident prevention program are being implemented. Compliance audits are conducted at least every three (3) years. Both Operations and Corporate staff personnel may participate as audit team members. The audit team develops findings that are forwarded to gas plant management for resolution. Corrective actions taken in response to the audit team's findings are tracked until they are complete. The final resolution of each finding is documented, and the two most recent audit reports are retained.

CHEMICAL-SPECIFIC PREVENTION STEPS

The processes at this facility have hazards that must be managed to ensure continued safe operation. We have safety features on many units to help; contain/control a release, quickly detect a release, and reduce the consequences of (mitigate) a release. Several safety features are utilized in the covered processes including:

a) Release detection-Hydrocarbon detectors with alarms, Release containment/control
b) Process relief valves that discharge to a flare to capture and incinerate episodic releases
c) Valves to permit isolation of the process (manual or automated)
d) Automated shutdown systems for specific process parameters (e.g., high pressure and temperature)
e) Release mitigation: Fire suppression and extinguishing systems. Our employees are trained to fight small fires or initiate an ESD only

FIVE YEAR ACCIDENT HISTORY

The Roosevelt Plant has not experienced any reportable accidents in the past 5 years.

Kinder Morgan's approach is to investigate incidents or events that either did or could have reasonably resulted in an uncontrolled release of hazardous substances, to determine ways to prevent these events from recurring.

EMERGENCY RESPONSE PROGRAM

Executive Summary

This facility maintains a written emergency plan, which is in place to protect worker and public safety, as well as the environment. The Emergency Plan is provided to assist personnel who react to and respond to plant emergencies. It contains information relating to recognition and reporting of emergencies, minimizing hazards, and actions that must be taken to protect personnel, property and gas service. The objective of the Emergency Plan is to assure that personnel who could be involved in an emergency are adequately trained to recognize and deal with emergency situations in an expeditious and safe manner.

Facility personnel are trained to take defensive or incipient firefighting actions. Local fire departments will be responsible for extinguishing fires that have gone beyond the incipient stage. Therefore, this plan is limited to providing guidance for our employees to evacuate the facility and notify the appropriate authorities.

Employees receive training in these procedures as necessary, to perform their specific emergency plan duties. The emergency plan is updated when necessary, based on modifications made to gas plant processes or other facilities. The emergency plan changes are administered through the Plant Supervisory approval process, which includes informing and/or training affected personnel in the changes.

PLANNED CHANGES to IMPROVE SAFETY

We are committed to operating this facility in a safe manner for workers, the public, and the environment. Our personnel utilize auditing processes to ensure that this facility complies with safe operations of its processes. Improvements to safety are a continual process at the plant and safety policy and procedure modifications are constantly evolving. Specific changes to control equipment or technology and installation of new mitigation systems are not in progress at this time.

Attachment 6: State and County Permits

Agency	Status	Comments
North Dakota Department of Health-Air Permit	Pending	Permit application for expansion is in development.
North Dakota Department of Health-NPDES Construction Stormwater	Pending	Stormwater plan for project is in development.
McKenzie County Conditional Use Permit	Update Pending	CUP 0068-14 issued for the original Gas Plant; permit to be updated to include expansion activities.