

PU-18-405
Skunk Hill to DPR
Belle Fourche Pipeline Company
Late-Filed Exhibit 6 – Spill Response Plan

Belle Fourche’s U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration (“PHMSA”) spill response plan was designated as Late-Filed Exhibit 6. As demonstrated by the attached approval letter, PHMSA has received and reviewed Belle Fourche’s Combined Operated Systems Oil Response Plan (the “Plan”) and subsequently approved the Plan on March 13, 2018 (this document was previously filed with the Commission on March 25, 2019 as Docket No. 28). Belle Fourche’s complete Plan is over 700 hundred pages in length and contains a significant amount of confidential and/or sensitive information. Additionally, because this Plan governs both Belle Fourche’s and Bridger Pipeline LLC’s operated systems, the Plan contains a significant amount of confidential and/or sensitive information pertaining to other systems unrelated to the Project. For these reasons, Belle Fourche has provided a copy of portions of the Plan, some of which are redacted, in a good-faith effort to provide the requested information. In the event the Commission determines the information provided in this exhibit is insufficient, upon request, Belle Fourche will bring a hard copy of the Plan to the Commission to review along with the Commission.



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety Administration**

1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

March 13, 2018

Bob Dundas, P.G.
Environmental Coordinator
Belle Fourche Pipeline Company/Bridger Pipeline LLC
455 North Poplar Street
Casper, WY 82601

RECEIVED
MAR 14 2018
ENVIRONMENTAL

**RE: LETTER OF APPROVAL: Belle Fourche Pipeline and Bridger Pipeline LLC Combined
Operated Systems Oil Spill Response Plan, Sequence Number: 2740, March 2018**

Dear Mr. Dundas:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has received and reviewed Belle Fourche Pipeline and Bridger Pipeline LLC's amended Oil Spill Response Plan for the Combined Operated Systems dated March 2018. We conclude that the plan complies with PHMSA's regulations concerning onshore oil pipelines found at 49 Code of Federal Regulations (CFR) Part 194. Your response plan is approved.

This approval is valid for five years from the date of this letter. If discrepancies are found during PHMSA inspections, or if new or different operating conditions or information would substantially affect the implementation of this plan, you will be required to resubmit a revised plan. See 49 CFR § 194.121(b).

Should you have any questions or concerns, please contact me at (202) 366-4595 or by email at PHMSA.OPA90@dot.gov. Please include the sequence number and your PHMSA Operator Identification Number on any future correspondence.

Sincerely,

David K. Lehman, Director
Oil Spill Preparedness and Emergency Support Division
Office of Pipeline Safety

cc: PHMSA Central and Western Regions

OPA '90
Oil Spill Response Plan
Belle Fourche Pipeline Company/Bridger Pipeline LLC
Combined Operated Systems (Sequence Number 2740)

Section 1: INFORMATION SUMMARY

- (1) Formerly, both Belle Fourche Pipeline Company (BFPL) and Bridger Pipeline LLC (BPL) (hereinafter referred to collectively as Pipelines) operated under individual, independent response plans approved by PHMSA with unique geographic Response Zones assigned within each plan. However, after careful consideration, BFPL and BPL have elected to combine their three individual plans into one comprehensive response plan document. A combined response plan will greatly enhance the effectiveness of any response effort by the Pipelines, allow for better cross-training of employees between companies and continue to allow for sharing of spill response equipment assets at the time of a response. The existing individual response plans and their corresponding PHMSA Sequence Numbers being combined into one plan are:

Belle Fourche Pipeline Co.: Sequence Numbers- 654 Western North Dakota Response Zone, 1021 Central Eastern Montana Response Zone, 1022 SE Montana/NE Wyoming Response Zone, 1024 SE Wyoming Response Zone

Belle Fourche Pipeline Co. (Sussex Diesel System): Sequence Number- 1264 Sussex Response Zone

Bridger Pipeline LLC: Sequence Number: Sequence Numbers- 1648 Poplar Response Zone, 1649 Baker/Little Missouri Response Zone, 1650 Butte Response Zone

The three new response zones (Sequence Number 2740) are titled North Dakota, Montana, and Wyoming.

- (a) The Pipelines operate crude oil pipelines and breakout tanks in western North Dakota, eastern Montana, and eastern Wyoming. BFPL also operates the Sussex diesel fuel pipeline system in the Powder River Basin area of WY and pipeline and terminalling systems for Eighty-Eight Oil LLC (EEOLLC) in eastern Wyoming. BPL also operates pipeline and terminalling systems for Butte Pipe Line Company. These collective systems cover approximately 3000 miles. Either Belle Fourche Pipeline or Bridger Pipeline can be reached at:

455 N. Poplar Street
P.O. Drawer 2360
Casper, Wyoming 82602
(307) 237-9301

Pipelines are prepared to respond immediately upon discovery of any oil spill within the systems they operate. Crude oil and diesel fuel are materials of value, spills are a costly occurrence to be responded to as quickly as possible to minimize environmental damage and reduce product loss.

(2) The pipeline systems have been broken down into three manageable response zones based on the physical layout of the lines, proximity of response capability, location of Pipeline employees and the operating State. Within each response zone discernible, discrete line sections have been reviewed to determine their ability to cause "significant and substantial harm" in the event a release of crude oil occurs.

Response zones containing line sections meeting the criteria for "significant and substantial harm" are identified as indicated below. These decisions were made based on the "Line Section Response Plan Decision Criteria" and the accompanying "Line Section Exemption Decision Tree".

The Three Response Zones, from North to South are:

North Dakota

McKenzie, Golden Valley, Billings, Bowman, Dunn, Parshall, Mountrail and Stark Counties, North Dakota

Montana

Sheridan, Roosevelt, Richland, Dawson, Prairie, Fallon, Carter, Powder River and Wibaux Counties, Montana

Wyoming

Crook, Campbell, Natrona, Johnson, Converse, Niobrara, Goshen, Platte and Weston Counties, Wyoming

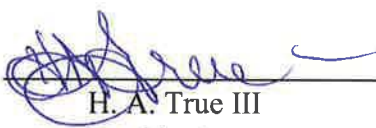

(b) (1) **An Information Summary** for each Response Zone Appendix is included in this section.

(c) **CERTIFICATIONS:**

Belle Fourche Pipeline operating on behalf of itself and Eighty - Eight Oil LLC and Bridger Pipeline LLC operating on behalf of itself and Butte Pipe Line hereby certifies that it has collectively obtained, through contract or other approved means, the necessary private personnel and equipment to respond to the maximum extent practicable, to a worst-case discharge or a substantial threat of such a discharge.

The Pipelines have prepared this Response Plan to be consistent with the National Contingency Plan, and the Region VIII Area Contingency Plan to the extent possible. The plan will be updated to assure consistency as the RCP/ACP is modified.

The Pipelines response plan will be submitted to DOT PHMSA for review and approval every five years from the last plan approval date.

Signed:  _____ 
H. A. True III
President – Belle Fourche Pipeline Company &
H. A. True III Trust, H.A. True III, Trustee –Bridger Pipeline LLC

Dated: 11/3/17

**Section 1 (b) APPENDIX. (A) NORTH DAKOTA RESPONSE ZONE
Information Summary**

- (1) Belle Fourche Pipeline/Bridger Pipeline
455 N. Poplar Street
P.O. Drawer 2360
Casper, Wyoming 82602
(307) 237-9301



- (3) The North Dakota Response Zone is located in Mountrail, McKenzie, Golden Valley, Billings, Bowman, Dunn, Mountrail and Stark counties and Parshall Township. This response zone is divided by QI into the Watford, Dickinson, Little Missouri, Parshall, Four Bears and Bowman areas, respectively.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(f) **The Release Information Report:**

This information must be provided for each release event, and for each follow-up report, if necessary.

(1) Name of Pipeline: Belle Fourche Pipeline/Bridger Pipeline
(2) Time and date of Discovery: _____ Reported: _____
Discovered by: _____

(3) Location of Discharge: _____

(4) Type of oil involved: sweet/sour crude oil: _____

(5) Reason for/cause of discharge: _____

Internal Corrosion: yes/no Third Party Damage: yes/no

Pipe Diameter: _____

(6) Estimated volume of oil discharged: _____ bbl

Estimated volume of oil recovered: _____ bbl

(7) Weather conditions: _____

(8) Actions taken or planned to clean up release: _____

(9) Other Available Information: _____

Release Notification Checklist:

Record contact person and time of calls \ subsequent contacts.

Release name: _____ Date: _____

Qualified Individual (Supervisor): _____

Person making notifications: _____

Entity Notified

Time called

National Response Center _____

State environmental department _____

BFPL/BPLLC management _____

Surface Management Agency _____

Others (as deemed appropriate) _____

list: _____

Equipment or Contractors Needed or Contacted:

List: _____

Other information:

Note: Not all agencies need to be notified for all releases.

***See Section 12 for Master Spill Notification/Information List

Section 3: SPILL DETECTION AND ON SCENE MITIGATION PROCEDURES

(a) **Methods of Initial Discharge Detection:**

- (1) Third party reports;
- (2) Regular Pipelines and contract pipeline aircraft patrol;
- (3) Casper Control Center (CCC);
- (3) Pipelines employee(s):
 - (A) Direct observation;
 - (B) Indirect observation; e.g. high flow rates or low pressures since these conditions can indicate a downstream leak. This may be noticed by either the facility operator or by the Casper Control Center (CCC). If the cause is not readily apparent, report the condition to the nearest field office (e.g. Donkey Creek, Stanly, Baker, Glendive, Bowman etc.) and the CCC.

Within the Pipeline system there are various combinations of remote sensing devices or SCADA. Generally, these systems automatically signal appropriate personnel if unusual operating conditions are detected, including high or low line pressures, power status, abnormal tank levels, etc. See the appropriate Section 9 appendix for more specific facility information. Low flows or high pressures indicate loss of a downstream booster, plugged lines, or closed valves. In any event the cause of abnormal flows or pressures must be found and corrected before normal operations can be resumed.

In addition to their regularly scheduled air patrols, pipeline planes can be dispatched [REDACTED] if necessary to look for possible leaks.

- (b) Procedures to be followed by discovering employee(s) to mitigate or prevent any discharge:
- (1) Shut off valves & pumps to prevent or halt flow;
 - (2) Attempt to contain any spill by building containment dikes;
 - (3) Notify the appropriate field office and the CCC of leak at first opportunity and whether additional equipment is needed;
 - (4) Remain on scene until the Qualified Individual arrives. Direct and/or assist with immediate response, containment, cleanup, and equipment utilization. Secure the site from livestock and unauthorized persons;
 - (5) Prior to reinstating operations, the QI or field supervisor will examine pipe to determine its operating condition.
 - (6) In the event of a release to water, upon detection the QI will dispatch the nearest company owned spill trailer (Sec. 12) to the area. Establishing containment of the release is the primary focus of the immediate response. Containment may be achieved by deploying containment boom in the water body, installation of siphon dams or other earthen containment structures. Isolation of the leaking source will be performed simultaneously with the response event. Local company personnel will provide

immediate response manpower with additional 3rd party response organizations to be contacted as needed and as site conditions warrant. Upon containment, oil recovery operations will commence using skimmers, vac trucks or other collection devices. Crude oil will be transferred either into on-site storage containers (“frac tanks”) or transported to the nearest pipeline storage facility for temporary storage. The EPA Region VIII sub-area contingency plan TERA geographic response plan or other company geographic response planning documents may be used as a resource to further identify booming strategies within the response area, potential downstream receptors, equipment storage locations and other support information in the event of a release to water. As other geographic response plans are developed, they will be incorporated into the Pipelines FRP and incorporated into the response strategy.

- (7) Pipelines do not use dispersants or other chemicals for spill response in waters. Authorization to use dispersants would be requested and received from EPA Region VIII prior to any application of dispersant product. In the event that in-situ burning is required as a response strategy, EPA Region VIII and/or State regulatory agencies (i.e., WY DEQ, MT DEQ, ND DOH) will be consulted directly by the Environmental Coordinator who is familiar with requirements of the in-situ burn permitting programs. Ultimately, an expedited regulatory decision on these matters is the responsibility of the applicable permitting Federal/State regulatory agency and the timing of approval remains outside the control of the Pipelines operations. However, Pipelines is familiar with the information necessary for the in-situ burn permit application and capable for preparing and submitting these types of permits in an expeditious manner.

Cause and mitigation determination: External corrosion will show as a pitted area on the outside of the pipe with a hole at the bottom of a pit. Internal corrosion will show as a hole in the pipe wall with no surrounding pits. If the pipe has been hit or cut by someone find out who caused the damage and for whom they were working. The on-call supervisor or Qualified Individual will determine whether a leaking pipe should be clamped off and patched or a section of pipe replaced. After repair of the leak, normal operations can be resumed when directed from the appropriate field office and the Casper Control Center. If a relief has opened, attempt to learn how long the valve was open, report the valve pressure setting, and what pressure was reached. After approval from the QI or the field supervisor and correcting any problem, normal operations can be resumed.

- (c) Equipment that may be needed in response activities includes but is not limited to:
- (1) Vacuum tank trucks;
 - (2) Portable pumps, hoses;
 - (3) Picks, shovels, mechanized earth moving equipment;
 - (4) Pipe clamps;
 - (5) Sorbent booms, skimmers, boats
 - (6) Semi-tractors or pick-up trucks to pull response trailers.

Every response will be different and so will the equipment needs. The equipment available from various contractors, in-house response trailers and spill response associations can be procured and used as necessary, regardless of response zone designation.

Available equipment is listed separately in Section 12 of this plan as are sources of equipment from supply stores, as well as frac tank and vacuum truck contractors.

De-rated recovery capacity of the available equipment follows:

Vacuum trucks: storage capacity of 85-90 barrels and a recovery rate of approximately 170-180 barrels of fluid/hour.

Skimmers:	Acme 39T	2,333 barrels/day
	Elastec	240 bpd and 480 bpd
	Manta Ray	823 bpd
	Action Model 24-A drum skimmer	1954 bpd
	Acme vacuum skimmer	unknown
	Skim-Pak skimmer	unknown.

Pumps:	Honda pump nameplate rated	6343 bpd, each
	Versa-matic E-2	5314 bpd.

The remaining pumps recovery rates are unknown, it is anticipated they have similar recovery rates.

Boom available for use within the Pipeline Wyoming operating area includes over 5000 feet of skirted containment boom and several thousand feet of sorbent boom, with over 3600 feet of containment boom and over 800 feet of sorbent boom available in North Dakota and over 2400' of containment boom available in the Montana operating area. This boom includes supplies provided by 3 area spill cooperatives located in Wyoming and North Dakota. Additionally, several thousand feet of additional containment boom and other response related equipment is available from Clean Harbors and SWAT Consulting (USCG approved OSRO's), and other participating cooperative member companies. Additional sorbent or containment boom can be obtained directly from Acme Boom in Tulsa, Moore Engineering in Denver and Hoerbirger Service in Casper and A-1 Supply. Specific trailer inventories are included in Section 12 of the plan.

Pipelines owned spill response equipment and contractor resources located in Wyoming, Montana and North Dakota are included in Section 12 of the plan (copy attached). These resources coupled with contracts with both Clean Harbors and SWAT Consulting (only two OSROs operating in ND, MT and WY area) demonstrates adequate spill response preparedness is available within all response zones. OSRO certification/response materials for SWAT & Clean Harbors are attached in Section 12.



Section 4: RESPONSE ACTIVITIES

- a) Once a leak is reported/detected, the supervisor on-call becomes the Qualified Individual (QI). The QI will decide the level of response needed and therefore the initial complexity of the ICS. The first effort by operations personnel will be to stop the flow of oil from the pipeline while implementing containment measures, notification(s), and mobilization of equipment and additional personnel, if necessary. See Section 3 for specific operational response requirements and the appropriate Section 9 appendix for the involved area as well as Guidance Documents for procedures consistent with the NCP in Section 11 of this plan. Clean-up efforts will continue until completed.
- b) The "Qualified Individual" shall be the "Incident Commander". The QI shall be English-speaking and available on a 24-hour basis. The QI has the full authority to: activate and contract with required oil spill removal organization(s); activate personnel and equipment maintained by the operator; act as liaison with the On Scene Commander (OSC); and obligate any funds required to carry out all required or directed oil response activities.
- c) The QI has the responsibility to manage all aspects of the response. If the complexity of the response requires such, the QI is authorized to designate a spill response team and delegate authorities for logistics, planning, operations, administration, etc. The personnel and expertise of the company, and its affiliates are available for all of these tasks. All response personnel report to the QI through their task supervisors.

The Pipelines response team structure is loosely patterned after the NIIMS Incident Command System. As defined, this system is highly flexible and capable of being adapted to the complexity or simplicity of the response action. The Pipelines QI is the in-house IC and is responsible for implementing the ICS system and expanding or contracting it as appropriate.

Incident Command System

The Incident Command System (ICS) is the emergency response organizational structure used by Pipelines to manage on-scene resources, strategies, and tactics.

The purpose of the ICS Process is to add order and structure to an incident/emergency so that it can be managed in an orderly or proactive manner.

The ICS shall be used by Pipelines when there is:

- a) an unplanned release, or
- b) an actual or potential threat to public, environment, facilities or personnel.

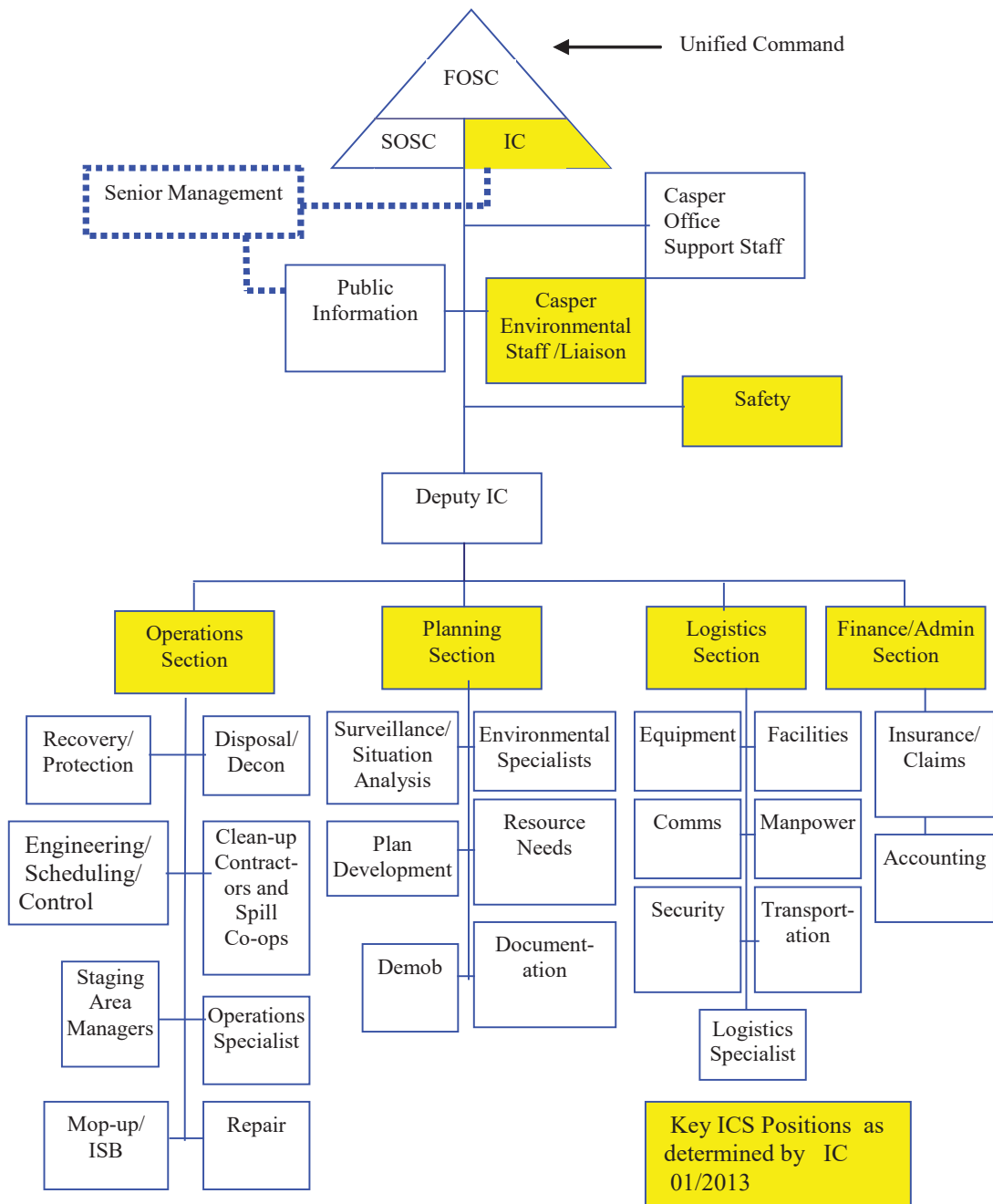
The ICS should be used to manage any incident; it is independent of incident size or complexity.

The first or most senior person on-scene is designated the Incident Commander (IC) and is responsible for activating the ICS.

The initial IC may be replaced when more experienced personnel arrives on-scene if it is determined that the scope or complexity of the incident requires an IC with a different skill level or experience.

The following chart is a guide for the development of an ICS structure.

Incident Command System



The ICS is developed from the top down and is headed by the Incident Commander (IC). There are nine functional positions which report to the IC. Until the IC assigns individuals to each of these positions, October 2017 - 2 -

the IC has functional responsibility for all unassigned positions. The IC can request the Casper Office Support Staff fill any of the ICS positions as needed.

All ICS personnel have the following Common Responsibilities:

- Receive assignment, notification, reporting location, reporting time, and travel instructions from supervisor,
- upon arrival at the incident, check in at the designated check-in location, generally at the Incident Command Post,
- participate in incident planning meetings,
- use clear text and ICS terminology in all radio transmissions,
- identify the incident by name in all radio communications,
- receive briefing from immediate supervisor,
- acquire work assignments and materials,
- organize, assign and brief subordinates,
- determine resource needs,
- develop and implement accountability, safety, and security for personnel and resources,
- complete forms and paperwork required of the position, including lists of supplies to be replenished,
- ensure continuity by using in/out briefings,
- respond to demobilize orders,
- brief subordinates regarding demobilization orders.

The span of control is determined by the number of people reporting to one person. ICS disciplines each member to:

- limit the span of control to a manageable number of individuals
- train and prepare for exceptions, and
- assign an area of functional responsibility to another person as needed to maintain control.

Modular development enables on-scene ICS members to make decisions about expanding the ICS based on the specific requirements of the incident. Staffing of the structure can consist of one to hundreds of individuals depending upon the magnitude of the incident and the resources required to manage it.

Common Terminology ICS is a widely accepted and used emergency response process. During an emergency, response personnel may include company personnel from other locations, contractors, and governmental agencies. Pipelines require the use of ICS terminology to help maintain consistency of communication.

An ICS team is disbanded by the IC once the incident is resolved.

Unified Command

A unified command will be established during an incident anytime agency representatives are present. When governmental agencies have jurisdiction in managing an incident, a unified command may be established as follows:

- the Pipelines Incident Commander, and
- one designated individual from each jurisdictional response agency.

An integrated command occurs when personnel from the responsible party and participating agencies staff one or more ICS sections below the Incident Commander. This is not a subset of unified command or decision by consensus, but rather one chief per section with assigned roles within that section.

(d) Roles and Responsibilities of Local Response Teams:

The FIELD SUPERVISOR on call is the QUALIFIED INDIVIDUAL or Incident Commander. The Incident Commander oversees the entire operation. Sets objectives and priorities and has responsibility for the entire operation. All operational groups within the ICS report to the QI. The QI coordinates with federal OSC and others. All other ICS functions, as appropriate to the response, report directly to the IC.

The **Incident Commander** is responsible for:

- implementing overall management of the incident to protect personnel, the public, and the environment
- assessing the situation and/or obtaining briefing from the prior Incident Commander,
- determine incident objectives and strategies,
- establish priorities,
- establish incident command post,
- establish the appropriate organization,
- approve and authorize implementation of an Incident Action Plan,
- ensure adequate safety measures are in place,
- ensuring that responders are qualified to perform the tasks assigned
- coordinate activity of all command and general staff,
- activating Local Response Team and when required, the Casper Office Support Staff
- coordinate with key stakeholders and officials through the Liaison Officer,
- approve requests for additional resources or for the release of resources,
- keep agency informed about incident status through Casper Environmental Staff,
- coordinate incident investigation responsibilities,
- order demobilization of incident resources when appropriate, and
- report directly to the Pipelines management and Casper Environmental Staff.

Operations Section Chief

The Operations Section Chief is responsible for managing all operations directly applicable to incident response and clean-up. The Operations Section Chief activates and supervises elements in accordance with the Incident Action Plan and directs its execution; activates and executes the Site Safety and Health Plan; directs the preparation of unit operational plans as needed; requests or releases resources; makes expedient changes to the Incident Action Plan as necessary; and reports such to the Incident Commander. The Operations Section Chief participates in developing and implementing the Incident Action Plan and activates and supervises the personnel required to accomplish Operation Section tasks.

- develop operation portion of Incident Action Plan (IAP)
- brief and assign operations personnel
- supervise execution of the IAP
- request resources needed to implement IAP
- release unneeded resources
- ensure safe operations
- make changes as needed to the Plan

- report information about changes to the IAP, special activities, events and occurrences to Incident Commander as well as the Planning Section Chief and Liaison Officer

Planning Section Chief

The Planning Section Chief is responsible for collecting, evaluating, disseminating, and using information about the incident to: (1) understand the current situation (2) predict probable course of incident events, and (3) prepare alternative strategies for the incident. The Planning Section Chief participates in developing and implementing the Incident Action Plan and activates and supervises the personnel required to accomplish Planning Section tasks.

- collect, evaluate, disseminate, and use information related to the development of the incident
- assist in creation of the Incident Action Plan
- maintain the status of resources available to handle the incident
- obtain information needed to resolve the situation
- prepare alternative response strategies to handle the situation
- determine the need for specialized resources to support the incident
- assign technical specialists as needed
- advise Incident Commander and Section Chiefs of significant changes in incident status

Logistics Section Chief

The Logistics Section Chief is responsible for providing facilities, services and material in support of the incident response. The Logistics Section Chief participates in developing and implementing the Incident Action Plan and activates and supervises the personnel required to accomplish Logistics Section tasks.

- identify service and support requirements for planning and expected operations
- coordinate and process requests for additional resources
- advise on current service and support capabilities
- estimate future service and support requirements
- provide input into demobilization plans
- ensure general welfare and safety of Logistics Personnel

Finance/Administration Section

The Finance/Administration Section is responsible for all financial and cost analysis aspects of the incident and for supervising members of the Finance/Administration Section. Within Pipelines separate individuals manage these responsibilities.

- determine resource needs
- ensure that financial authorities are identified
- maintain contact with administration headquarters on finance matters
- establish lines of credit at local banks
- keep records of time sheets for contract as well as company personnel
- track costs and resources
- ensure that all obligation documents initiated at the incident are properly prepared and completed
- ensure all insurance claims documents initiated at the incident are properly prepared and completed

Safety Officer

The Safety Officer is responsible for monitoring and assessing hazardous and unsafe situations and developing measures to assure personnel safety. The Safety Officer will correct unsafe acts or conditions through the regular line of authority, although the Safety Office may exercise emergency authority to prevent or stop unsafe acts when immediate action is required. The Safety Officer maintains

awareness of active and developing situations, ensures the Site Safety and Health Plan is prepared and implemented, and includes safety messages in each Incident Action Plan. Only one Safety Officer will be assigned for each incident. The Safety Office may have assistants, as necessary. In addition to the Common Duties described above, the Safety Officer duties include:

- monitor and assess hazardous and unsafe conditions
- develop and implement measures that assure personnel safety
- coordinate the preparation of the site safety plan
- make recommendations for personal protective equipment, control zones and decontamination area
- exercise authority to stop or prevent unsafe acts
- investigate accidents that occur in the incident area
- ensure preparation of the Site Safety and Health Plan
- assign assistants and manage the incident safety organization.

Casper Environmental Staff or Liaison Officer

The Liaison Officer is responsible for interfacing with, and reporting to, the appropriate regulatory agencies and stakeholders affected by the incident after conferring with the Incident Commander or his designee. The Liaison Officer is also responsible for assisting and cooperating with outside non-response regulatory agencies such as Red Cross, water departments, environmental agencies etc., to disseminate or receive needed information. The Liaison Officer provides notification and updates internally as well as seeking legal advice in support of response activities. Any press interviews or press releases will be coordinated through the Liaison Officer. Only one Liaison Officer will be assigned for each incident.

- ensure incident funding is available (Pipelines management has stated it's commitment to provide funding for all incidents through completion)
- seek appropriate legal counsel
- act as the point of contact for the incident
- report incident and provide updates as needed to appropriate regulatory agencies
- authorize release of information to the news media or other interested parties
- arrange field tours and briefings as may be necessary
- maintain current information summaries of the incident
- update management as to the status of the incident

(e) Roles and Responsibilities of the Casper Office Support Staff

The purpose of the Casper Office Support Staff (COSS) is to manage off-site issues associated with emergencies whenever there is a Pipeline incident or event for which the IC requests their assistance. The Casper Environmental Staff will activate any of the support staff as requested by the IC and as dictated by the complexity of the event. One person may occupy more than one of the Casper Office Support Staff positions.

The **Casper Office Support Staff** is composed of:

Environmental/Regulatory Compliance

Public Affairs

Finance

Insurance

Legal

Engineering and Scheduling

Safety
Documentation

The **Casper Environmental Staff/Liaison** is responsible for:

- emergency response coordination/planning
- developing and approving off-site strategies
- activating additional team members/resources
- assuring communication with Incident Commander, Operations Manager, owners/partners, or other companies
- coordinating all efforts of the team members
- reviewing regulatory issues, and assisting in regulatory interpretations
- communicating with agencies and other governmental entities as needed providing miscellaneous regulatory and compliance support
- providing support with the emergency response process and plan implementation
- supporting field activities by recommending and accessing internal or external consultants and/or experts for environmental and safety regulatory issues, and
- reporting of release volumes and other response information to regulatory agencies.

The **Finance Staff** is responsible for developing the strategy for support of tax and accounting issues related to the incident.

The **Insurance Staff** is responsible for coordinating insurance claims and efforts.

The **Legal Staff** is responsible for:

- communicating with owners/partners, as required.
- making recommendations concerning legal issues and courses of action.

The **Engineering and Scheduling Staff** is responsible for coordinating the:

- impact upon the business development and implementation of alternate transportation
- scheduling strategies for control center information
- arranging frequency and format of communication and communication support, and
- arranging for technical recommendations and support establishing the investigation team.

Public Affairs is handled by the Casper Environmental Staff, Law Department and 3rd party Public Information Officer (PIO) consultants as required. They are responsible for coordinating development and:

- developing and executing external affairs strategies, fact sheets, and press releases for dealing with the media, affected communities, elected officials, and other key external audiences.
- establishing a single information center where all external summaries and statements about the incident are prepared
- releasing information to the news media and other appropriate agencies, and
- maintaining appropriate communications with the public.

The **Safety Staff** is responsible for:

- providing a general oversight of safety issues
- arranging for safety support and resources, and

- supporting field activities by recommending and accessing internal or external consultants and/or experts for safety regulatory issues.

The **Land/Right-of-way Staff** is responsible for support to field land agent activities.

The **Documentation Staff** is responsible for:

- recording key meeting issues and action items, and
- following the guidelines for documentation.

(f) **Recordkeeping:** Every incident has an oral or written action plan prepared for each operational period, a period of time chosen based on the nature of the incident, typically a half day, a day or several days. The NIIMS ICS forms were created to help prepare the incident action plan and to record all aspects of the response action. NIIMS forms may or may not be used for tracking an individual incident. If the release is of sufficient complexity they will be used as appropriate.

(g) **Coordination with the OSC:**

The "Qualified Individual" will be informed of the appointment of a State or Federal "On Scene Coordinator" (OSC) as soon as Pipelines headquarters is so notified. Thereafter, the "Qualified Individual" shall inform the OSC of all steps that have been taken and those that are being taken, as well as seek the OSC's directions as to appropriate additional response measures.

If the Federal OSC takes control of the response, the resources of Pipelines will be integrated into the OSC command structure as requested by the OSC.

(h) Following is a list of the Spill Response Organizations, Associations and Contractors that are immediately available to Pipelines in the event of a release of oil to the environment. More specific information on spill response organizations and their equipment is available in Section 12 of this document.

- (1) Pipelines are a member of three voluntary oil spill response associations these are:
 - (A) Southeast Wyoming Spill Association with three response equipment trailers and,
 - (B) Williston Basin Oil Spill Cooperative with one response equipment trailer.
 - (C) Sakakawea Area Spill Response LLC with four response equipment trailers and four response boats.

■ [REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Section 6: TRAINING PROCEDURES

Pipeline field personnel are provided various levels of training dependent on their overall job responsibilities. This training is conducted per the appropriate OSHA and DOT/PHMSA OQ regulations, as are refresher classes for the same.

a) Training programs include (but not limited to):

- *Respiratory Protection; Benzene and Hydrogen Sulfide concerns
- *Lockout/Tagout procedures
- *Confined Space Entry procedures
- *Personnel Protective Equipment related to crude oil handling
- *Trenching/Excavation safety standards
- *Worker Right-to-Know/Hazard Communication Standard
- *HAZWOPER/Hazardous Waste Operations and Emergency Response
- *Drivers Safety
- *Dry Land Oil Spill Response
- *Inland Waterway Spill Response
- *Incident Command

b) All Employees know:

- (1) Their responsibilities under the response plan will be tailored to the spill event at hand and be determined by the Qualified Individual or Spill Response Coordinator (a Pipelines supervisor).
- (2) Contact with the pipeline supervisor within the incident's area field office is their first responsibility when a leak is detected.



- (3) The supervisor on-call within the incidents area field office is the "qualified individual" to be contacted. These individuals are:

[REDACTED]

[REDACTED]

[REDACTED]

In the event of an emergency, any/all QI's listed above may be called upon to respond within their given response zone.

c) Personnel reporting releases to agencies:

- (1) Have been trained in the reporting procedures for in-house response;
- (2) Maintain a running log of release reports and remediation activities;

- (3) Appropriately report releases to State and Federal agencies. These phone numbers are contained in this document.
- (4) Shall update this response plan as described in Section 8.

d) Personnel engaged in response activities know:

- (1) The characteristics and hazards of the crude oil/diesel fuel transported in Pipelines owned and operated facilities. These characteristics include, in some black oil, elevated levels of hydrogen sulfide and, in some green oils or diesel fuel, elevated levels of benzene. All oils are slick by nature possibly creating a slipping hazard. Some light green oils may be flammable. All crude oils are combustible to some extent.
 - (2) Conditions likely to worsen emergencies include winter storms with heavy snow, subzero temperatures, fluctuating water levels and dangerous wind chill factors; Pipelines personnel have historically operated in these conditions. Other factors that could worsen emergencies include the failure of valves to function or to close fully when operated. Pipelines routinely operate all pipeline valves to assure they function as needed.
 - (3) The steps necessary to control any accidental release of oil include: containment, stopping the flow, product recovery and cleanup of contaminated materials including oily water and soil. Disposal of wastes generated during response operations will be handled on a case-by-case basis depending on the materials to be disposed. All recovered crude oil/diesel fuel will be returned to the nearest appropriate (green or black) crude oil tank or truck dump. Opportunities for explosion are limited to inappropriate tank cleaning operations. Fire is a tool often used to facilitate oil spill cleanup in an effort to reduce possible environmental damage that could be caused by a crude oil release. Pipelines do not use dispersants or other chemicals for spill response.
 - (4) Pipeline employees are trained in the proper use of chemical fire extinguishers for use on relatively small equipment fires. All other facilities rely on the local emergency response agency to provide fire protection in the event of a large fire. In most situations the facilities are quite remote and would be consumed before response personnel could arrive. In such situations heavy equipment would be used to construct additional diking as needed to contain released oil, and stop the spread of fire.
- e) Training records are maintained, including updates, in the files of the safety coordinator for Pipelines as required by the appropriate EPA, DOT and OSHA regulations. Training records for response personnel are maintained in the Casper office as long as they have assigned duties in the response plan.
- f) Training records for contract personnel are maintained by the contractor. The contractor provides assurance to Pipelines of the training his personnel receive. Any training provided to third party contractors by Pipelines will be documented and those records maintained in the contractors file. The contractors training file will be maintained by the safety coordinator for Pipelines in the Casper office.
- g) HAZWOPER (Hazardous Waste Operations and Emergency Response) training is provided for all appropriate Pipelines personnel. Refreshers are provided for HAZWOPER trained personnel as required in 29 CFR 1910.120. These records are maintained in the safety training files in

Pipelines Casper office.

Third party contractors are responsible for providing HAZWOPER training to their response personnel. Copies of these records or a letter stating such training will be provided to Pipelines by the contractor. These records will be maintained in the contractors file in the Pipelines Casper offices.

- h) The response to an accidental release may be recorded as an Unannounced Drill. A review following the event is used as a training tool to assess the Response Plan and the performance of equipment, responding personnel, and contractors. The outcomes from these reviews may be used to improve the Response Plan.

Section 6A: Equipment Testing Procedures

All response equipment is inventoried and inspected for condition on at least an annual basis. In addition, following each use of equipment the general condition is noted and that which is no longer serviceable is replaced. The equipment stores are generally maintained in a complete inventory status, exceptions include those times when equipment/supplies have been ordered and are awaiting delivery.

Southeast Wyoming Oil Spill Association conducts an annual inventory of response equipment of the Casper, Sinclair and Guernsey/Ft. Laramie response trailers. The inventory and equipment condition information is provided to each member company. Equipment inventories are also conducted following each use of the response trailer, and replacements made as needed. The frequency of equipment inventory is provided in the membership agreement.

Williston Basin Oil Spill Cooperative conducts an annual inventory of equipment and condition. These lists are provided to member companies. Equipment inventories are conducted following each use of the response trailer, and replacements made as needed. The annual report of equipment and material condition is provided for in the membership agreement.

The Sakakawea Area Spill Response LLC conducts an annual inventory of equipment and condition. These lists are provided to member companies. Equipment inventories are conducted following each use of the response trailers, and replacements made as needed. The annual report of equipment and material condition is provided for in the membership agreement.

Pipelines and Black Hills Trucking spill response equipment is inventoried following each use and annually for condition and completeness. Additions are made to the equipment stores as needed to maintain a complete stock.

The Pipelines Supervisor with responsibility for the area in question is responsible for the annual inventory and condition check of response equipment. For example John Wolfe, Donkey Creek area supervisor is responsible for the trailer at the BFPL yard in Donkey Creek. The QI for a response operation, or his designee, is responsible for the inventory, restocking and condition check of all equipment trailers used in the course of the response.

Recommended Guidelines for Inspection & Testing

The frequency for inspecting and maintaining emergency response equipment is listed below.

Equipment to be Inspected	Frequency of Inspection
Spill trailer	Annually or after deployment of equipment during drill or actual emergency
Generators	Annually
Outboard motors	Annually
Pumps	Annually
Chain saws, blowers, and other small two-cycle engines	Annually
Communications equipment	Annually (quarterly for batteries)
Boom trailer (if applicable)	Annually or after deployment of equipment during drill or actual emergency

Guidelines for inspection and maintenance of emergency response equipment are as follows:

Equipment to be Tested	Procedure
Generators	<ul style="list-style-type: none"> • Run a minimum of 10 minutes under a load. • Run more often if deemed necessary by the area. • Do the following steps prior to long-term storage. • Put the fuel stabilizer in the fuel tank. • Run the engine long enough to get the fuel stabilizer into the carburetor and then cut the fuel off at the tank. Run the engine dry. • Top off the fuel tank to prevent any condensation. • Clean and store dry small fuel tanks. • Remove the spark plug and spray inside the cylinder with a mist of WD-40 or other parts protector. Replace the spark plug. • Drain the fuel lines if possible.

Equipment to be Tested	Procedure
Outboard motors	<ul style="list-style-type: none"> • Run a minimum of 10 minutes. Either place the lower unit in a drum of water or use an adapter to connect the water hose to the lower unit. Do the following steps prior to long-term storage. • Put the fuel stabilizer in the fuel tank.

Equipment to be Tested	Procedure
	<ul style="list-style-type: none"> • Run the engine long enough to get the fuel stabilizer into the carburetor and then cut off the fuel at the tank. Run the engine dry. • Top off the fuel tank to prevent any condensation. • Clean and store dry small fuel tanks. • Drain the lower unit and replace with a fresh lower-unit oil. • Remove the spark plugs and spray inside the cylinder with a mist of WD-40 or other parts protector. Replace the spark plug. • Drain the fuel lines if possible. Consider having a spare fuel line available.

Equipment to be Tested	Procedure
Pumps	<ul style="list-style-type: none"> • Run for at least 10 minutes. Do the following steps prior to long-term storage. • Flush the pump with fresh water. • Drain the pump of all water and spray a heavy mist of WD-40 or other parts protector into the suction of the pump. • Put the fuel stabilizer into the fuel tank. • Run the engine long enough to get the fuel stabilizer into the carburetor. • Turn the fuel off at the tank and run the carburetor dry. • If the carburetor has a drain plug, open the drain to remove any fuel left.
Chain saws, blowers, and other small two-cycle engines	<ul style="list-style-type: none"> • Do not test provided that you follow these long-term storage procedures. • Run the engine dry of fuel. • Air-dry the fuel tank. • Remove the spark plug and spray inside the cylinder with a mist of WD-40 or other parts protector. Replace the spark plug. • Spray or wipe with a light coating of oil on bar and chain of chain saw.

Equipment to be Tested	Procedure	
Communications equipment	Do the following according to type of equipment.	
	Equipment	Procedure

Equipment to be Tested	Procedure	
	Two-way radio	Check the power and frequency with a service monitor.
	Satellite	Assemble the transportable INMSRSAT terminal. Set up and make a call.
	NICAD battery	Cycle all batteries including spares using the battery cycle system. Store in the proper case.
	Battery inverter and DC power supplies	Check under load.

Response contractors are responsible for the maintenance of their own equipment, as stated in the True Companies Master Service Contract. Equipment list updates are requested annually.

Section 7. DRILL PROCEDURES

(a) **Announced and Unannounced Drills:**

(1) Training Drills are the responsibility of the Pipeline Superintendent. He or his designee has the duty of planning, implementing and monitoring these exercises as well as record keeping. These drills may be announced or unannounced.

(A) Unannounced drills will be periodically and randomly completed throughout each year of the triennial cycle. These drills may include but are not limited to, Casper Control Center alarms/callouts, third party or pipeline air patrol notification, false alarms, in facility equipment failures including SCADA and/or Control Center notifications, and pipeline releases to land or water. At a minimum, one unannounced exercise will be completed each year of the triennial cycle.

(B) Announced Drills will occur as required to meet the frequencies listed below. These drills will be more task or situation specific in nature than unannounced drills.

(b) **Types of Drills and their frequencies** include the following:

(1) Alarms at manned facilities, emergency procedures, pipeline releases and notification of "the qualified individual" conducted quarterly and/or as necessary;

(2) Emergency procedures implementation at unmanned facilities, mobilization of operations/maintenance personnel, notification of "the qualified individual", conducted quarterly and/or as necessary;

(3) Annual spill management team, as determined by "location", table-top drill-each response zone every three years;

(4) Oil Spill Removal Organization field equipment deployment exercise, annually; and

(5) A drill that exercises the entire response plan for each response zone, every three years.

(6) Pipelines will participate in government initiated unannounced exercises and area exercises when conducted.

(7) In accordance with the DOT/PHMSA PREP Exercise requirements set forth in Table 5.3 on page 5-4 of the 2016 PREP guidelines, equipment deployment activities will be performed at a minimum annually (one/year) per triennial cycle (1 exercise/response zone). Deployment of oil skimming systems will also be included in deployment exercises. Additionally, all equipment deployments in response to actual releases to water will also be documented and credited to support equipment deployment exercises. This testing frequency is in addition to the OSRO annual deployment exercises that are completed.

(c) **On-the-Job-Training:** Frequently, situations occur and alarms go off that require an operations or engineering drill to determine if a release of oil is occurring somewhere within the system. These unplanned, unannounced "drills" are excellent training opportunities for all levels of Pipelines staff.

(d) **Drill records:** All response actions including false alarms are documented as part of the training record as are all response exercises/drills required by this section. The list of training events previously found in the plan is now maintained in the training file which is maintained in the Casper office and is kept for a minimum of three years.

(e) **Plan Amendments:** Information gleaned from response debriefings will be reviewed for potential improvements and/or changes to response activities that will increase the efficacy of the Pipelines response action. Based on the findings of the response evaluations, changes will be recommended and made to the plan as warranted.

Section 8: PLAN MODIFICATION AND UPDATE PROCEDURES

(a) Response Plan Updates:

The response plan shall be reviewed at least once every five years beginning following initial approval date of this combined Facility Response Plan. The plan must also be modified as needed to address new or different operating conditions or changes in information provided in the plan (49 CFR 194.121).

Changes in operating conditions or information which could substantially affect the implementation of the plan shall be made immediately. Notification of such changes must be made to PHMSA within 30 days thereafter. Examples of such a "significant change" include:

- (1) An extension of the existing pipeline or construction of a new pipeline in a response zone not covered by the previously approved plan;
- (2) Relocation or replacement of the pipeline in a way that substantially affects the information included in the response plan, such as a change to the worst case discharge volume;
- (3) The type of oil transported, if the type affects the required response resources, such as a change from crude oil to gasoline;
- (4) The name of the oil spill removal organization;
- (5) Emergency response procedures;
- (6) The qualified individual;
- (7) A change in the NCP or an ACP that has significant impact on the equipment appropriate for response activities; and
- (8) Any other information relating to circumstances that may affect full implementation of the plan.

(b) Plan/Response Review:

1. In the event a worst case discharge occurs, the response to that event and the adherence of the response to the plan will be reviewed by participating individuals including a qualified individual, operations personnel, office technical staff, senior management and a representative of a response agency (if appropriate). Changes in the plan or in response procedures will be modified as necessary to maintain effective planning and response.
2. As this version is a new "combined" plan for Belle Fourche Pipeline and Bridger Pipeline LLC, no previous plan updates or revisions have been completed. As subsequent plan updates or reviews are completed, this section will be revised to reflect those dates.

Revision 1: July 2016 – updates to personnel information, notification information, minor edits to response zone maps, other minor administrative related updates. These updates are identified

throughout the plan in ORANGE font.

Revision 2: April 2017 – updates to plan based on PHMSA comments received 12/19/16. Addition of SWAT Consulting as OSRO. Minor revisions based on the Poplar Incident (January 2015) and Ash Coulee Incident (December 2016).

Revision 3: June 2017 - Updates to plan based on PHMSA comments dated May 26, 2017. Revisions were made to include 24-hour phone #'s for local law enforcement, fire departments and county emergency managers; equipment deployment testing procedures were revised; and outdated copy of the NCP was removed from Section 10 of the plan.

Revision 4: August 2017 - Updates to plan based on PHMSA comments dated August 4, 2017. Section 12 A –Master Notification List was expanded to include emergency 10-digit phone numbers for all county Sheriff and Fire Departments located within the operational areas of North Dakota, Montana and Wyoming.

Revision 5: October 2017 – Updates to plan based on purchase of 3rd party assets located in Bowman County ND and Fallon County MT. Revisions included addition of new contacts, contractors, equipment and map of the Bowman system. No changes to WCDs were required.

Revision 6: March 2018 – Updates to the plan based on PHMSA comments dated December 21, 2017 were made as follows: Section 6 and Section 9A were revised to delete references to RSPA and replace with PHMSA; Section 5(f) NRC notification procedures were updated, Section 9 basis for significant and substantial harm determinations and operators responsibilities to submit the required plan were clarified,

SECTION 9 APPENDIX (A) NORTH DAKOTA RESPONSE ZONE

(a)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(b) **Notification Procedure:**

If no answer at the Belfield/Stanley/Belfield North Dakota number (area code 701) or if during an evening, weekend or holiday, notify one of the field supervisors (QI) via cell phone or call the Casper Control Center-CCC (24/7). The dispatcher at the CCC, Belfield/Stanley/Belfield office will continue to relay the message contacting [REDACTED] or one of the other listed supervisors. The call list is on page one of Section 5 and this section of the core plan, the call list is also included in Section 12 of the plan and includes home phone numbers (where applicable).

(c) **Spill Detection and On Scene Mitigation Procedures:**
Methods of Initial Discharge Detection:

- (1) Third party reports;
- (2) Regular pipeline aircraft patrol;
- (3) Pipelines employee:

(A) Direct observation;

(B) Indirect observation. The North Dakota pipeline system is operated with locally controlled equipment and various dial-up SCADA systems, it is also remotely monitored by the Casper Control Center-CCC. On site equipment monitors high and low pressures on the pumps shutting them down as needed, in addition to time clocks and or tank level switches. Other facilities are equipped with dial-up type SCADA, which monitor pump status, ACT's and tank levels in addition to pump controllers. These systems call alarms to the appropriate personnel.

Line patrol planes can be called out [REDACTED]
[REDACTED] if necessary to look for possible leaks.

Procedures to be followed by discovering employee(s) to mitigate or prevent any discharge include but are not limited to:

- (1) Shut off valves & pumps to prevent or halt flow;
- (2) Contain any spill by building containment dikes;
- (3) Notify Stanley/ Belfield/ Bowman office or CCC of leak at first opportunity and state if additional equipment is needed;
- (4) Remain on scene to direct and assist containment, cleanup, equipment utilization and secure site from livestock and unauthorized persons until the QI arrives;
- (5) Prior to reinstating operations, examine pipe to determine its operating condition.

Any abnormal operating condition must be investigated, the cause corrected, and any damage found and corrected. All abnormal operations must be reported to your immediate supervisor before resuming operations.

If valves are unintentionally closed, determine who closed the valve and why, if possible, before opening them and resuming operations. If a pump has operated against a closed valve attempt to determine what pressure was reached. Inspect the pump and piping for damage, and upon approval from your supervisor start it, observe to determine it is operating normally and check for leaks.

Any line that has been pressurized above its design limits must be inspected, pressure tested, and repaired, if necessary, before returning it to operation. This testing should be done under the direction of one of the Supervisors.

Flow rates or pressures above or below normal operating levels must be investigated. High flow rates or low pressures can indicate a downstream leak. If the cause is not readily apparent, report the condition to Stanley/Belfield/Bowman/CCC. Low flows or high pressures indicate loss of a downstream booster, plugged lines, or closed valves. In any event the cause of abnormal flows or pressures must be found and corrected before normal operations can be resumed. All SCADA alarms must be responded to and investigated.

If any safety device has operated, find the cause and report it to Stanley/Belfield/Bowman or CCC. If a relief has opened attempt to learn how long the valve was open, report the valve pressure setting, and

what pressure was reached. After approval from your supervisor and correcting any problem normal operations can be resumed.

External corrosion will show as a pitted area on the outside of the pipe with a hole at the bottom of a pit. Internal corrosion will show as a hole in the pipe wall with no surrounding pits. If the pipe has been hit or cut by someone, find out who caused the damage and for whom they were working.

The Supervisor (QI) will determine whether a leaking pipe should be clamped off and patched or a section of pipe replaced. After repair of the leak, normal operations can be resumed when directed from Stanley/Belfield/Bowman field office.

In the event of a tank fire the source of oil to the burning tank should be isolated and shut off, and the oil remaining in the tank pumped out as fast as possible. Report the fire to your supervisor and the Stanley/Belfield/Bowman office/CCC. They will notify the Fire Department if one is available in the area. Small fires usually can be controlled with a fire extinguisher. Tank walls should be cooled with water if it is available. This is especially important in the case of a burning propane or LPG tank. If you do not have sufficient fire fighting training, equipment, water and protective clothing evacuate the area around the fire and keep everyone away until the fire burns out.

Propane, LPG and Butane-Gasoline Mix vapors are heavier than air, and will travel downhill away from the source. In the event of a large release of one of these materials, evacuate everyone not fighting the fire at least 1/2 mile in all directions to an area uphill and upwind. Do not put out the fire unless the source of the gas leak can be shut off.

A burning pump should be isolated and the fire put out with an extinguisher.

The QI will determine what repairs need to be made to the system before normal operations can resume.

Spills which threaten to enter or enter navigable water require special effort. The rapid construction of dams and dikes can keep oil from entering live water from dry side drainages. Quickly deploy containment/sorbent booms (available at Baker, Glendive, Casper, Donkey Creek, Belfield, Stanley, Van Hook, Watford City, Williston, Gillette, Sussex and Guernsey) as a second level of protection at the mouth of side drainages.

Oil spill associations have been created in Western North Dakota in an effort to provide quick and appropriate response to on water emergencies. The Pipelines are a member of two associations and as such is assured of access to supplemental response equipment trailers.

Once initial response has been started, the spill response trailers should be mobilized to the site. Boats, booms, pumps and skimmers are among the equipment available in the response trailers.



A list of the equipment on the trailers is included in Section 12. Additional spill response trailers and resources are owned by affiliated companies and located throughout North Dakota, Montana and Wyoming. Any of these resources are available to the Pipelines upon demand.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

(e) Response Activities and Equipment:

In the event of a release to water, upon detection the QI will dispatch the nearest company owned spill trailer (Sec. 12) to the area. Establishing containment of the release is the primary focus of the

immediate response. Containment may be achieved by deploying containment boom in the water body, installation of siphon dams or other earthen containment structures. Isolation of the leaking source will be performed simultaneously with the response event. Local company personnel will provide immediate response manpower with additional 3rd party response organizations to be contacted as needed and as site conditions warrant. Upon containment, oil recovery operations will commence using skimmers, vac trucks or other collection devices. Crude oil will be transferred either into on-site storage containers ("frac tanks") or transported to the nearest pipeline storage facility for temporary storage. The EPA Region VIII sub-area contingency plan TERA geographic response plan (https://r8.ercloud.org/TERA_External/) or other Pipelines response plans (see Section 9 Appendix A North Dakota Maps) may be used as a resource to further identify booming strategies within the response area, potential downstream receptors, equipment storage locations and other support information in the event of a release to water.

Temporary storage areas for recovered water and oil must be determined as quickly as possible. The location will be dependent on the potential volumes of fluid to be handled and the storage capacity available in the system tanks. In this response zone there is over 250,000 barrels of tank capacity spread between at least twelve (12) facilities. Some portion of this capacity may be available for use as temporary storage in the event of a major release. Portable tankage (frac tanks) may be required, information regarding tank rental contractors is provided on the Master Spill List (Section 12).

Releases affecting dry land only will be responded to with the same level of commitment for the protection of human health and the environment as those on water.

Pipelines has available, through contract with OSRO contractors described earlier in this section, Clean Harbors and SWAT Contracting, agreement with Williston Basin Oil Spill Coop & Sakakawea Area Spill Response LLC and in-house, the equipment and personnel needed to respond to the "Worst Case Discharge" anticipated in this response zone. Equipment lists, personnel commitments and agreements illustrating this level of preparedness are included in this Response Plan. Any and all response equipment available to Pipelines is available for use in this Response Zone.

(f) The Master Spill List, found in Section 12, contains the emergency notification numbers for North Dakota.

(g) [REDACTED]

(h) The "Worst Case Discharge" (WCD) volume calculated for this response zone is 24,000 Barrels of crude oil, from the Skunk Hill Station breakout tank.

[REDACTED]