

**West Texas Gas Utility, LLC. and its
Subsidiaries and/or Affiliates**

**TEXAS
DAMAGE PREVENTION PLAN**

**For Multi-Systems which includes the following
OPS ID's:**

West Texas Gas Utility, LLC. 22435
Western Gas Interstate Company, LLC 22462
WTG Gas Transmission Company, LLC 31968

January 2022

Review and Revision Log

This Damage Prevention Plan will be reviewed annually and any changes will be reflected in these reviews and/or revisions.

Review/Revision Date	Revision Number	Revision Description	Revision Justification
December 2013	New Plan	Additions / Corrections throughout the entire program	Complete revision of entire Damage Prevention Plan per TRRC audit 107454, 107456, and 107458. WTG's existing Damage Prevention plan was lacking in several areas and failed to meet the required regulations.
April 2014	1	Added procedures for taking pictures of line locates and/or damages to WTG pipelines and/or facilities	Occurring damages on WTG pipelines that did not have supporting documentation of locates
Oct 2019	2	Add Ticket Management System and Reporting Time	Rule Changes and Ticket Management Changes
January 2022	3	OPID and Name Changes	Organizational Change



Damage Prevention Plan

Table of Contents

Review and Revision Log	2
Article 1 - Introduction and Scope	5
Introduction	5
Scope 5	
Article 2 – Terms, Definitions, Acronyms, and Abbreviations	6
2.1 Terms / Definitions.....	6
2.2 Acronyms / Abbreviations	7
Article 3 – Regulatory Compliance	8
3.1 Compliance	8
3.2 Participation in Public Service Programs	8
3.3 Other Resource	8
Article 4 – Damage Prevention Plan	9
4.1 WTG’s Obligation with Respect to Emergency Excavation Procedure:.....	9
4.1.1 Excavators: If West Texas Gas damages an underground facility while excavating:.....	9
4.1.2 Operators of damaged underground facilities:	9
4.2 WTG’s Obligation with Respect to Damage or Near Miss Reporting.....	10
4.2.1 Operator	10
4.2.2 Excavator.....	10
4.3 WTG’s Obligation with Respect to Updating Pipeline Maps with Applicable One Call Centers.....	11
4.3.1 Pipeline Location Corrections	11
4.3.2 New Installations or Re-routes	11
4.4 WTG’s Obligation with Respect to Identifying Excavation Related Persons	12
4.5 WTG’s Obligation with Respect to Record Retention	12
4.6 Pipeline Operator Damage Prevention Requirements.....	14
4.6.1 WTG’s Obligation with Respect to Handling Locate Requests	14
4.6.2 WTG’s Obligation with Respect to Notifications Received.....	15
4.6.2.1 Extraordinary Circumstances.....	15
4.6.3 WTG’s Obligation with Respect to Marking Underground Pipelines:	16
4.6.3.1 Marking Requirements.....	17
4.6.3.2 Guidelines for Operator’s Facility Field Delineation.....	17
4.6.3.3 WTG’s Obligation with Respect to “No Conflict” Markings:.....	22
4.6.4 WTG’s Obligation with Respect to Pipelines that Could be Damaged during Excavation.....	23
4.6.5 WTG’s Obligation with Respect to Procedures for Un-Locatable Pipelines ...	23
4.6.5.1 Description:	23



Damage Prevention Plan

4.6.5.2 Procedure Steps:.....	23
4.6.5.3 Responsibility:	24
4.6.5.4 Documentation:	24
4.6.6 Directional Drilling and Trenchless Technology Operations	24
4.6.7 WTG's Obligation in the Event a Pipeline was Unmarked/Mismarked.....	25
4.6.8 WTG's Obligation with Respect to Photographing Completed Line Locate ...	25
4.6.9 Reporting Requirements	25
4.7 Excavator Damage Prevention Requirements	26
4.7.1 Excavator Notice to Notification Center.....	26
4.7.2 Options for Managing an Excavation Site in the Vicinity of an Underground Pipeline	27
4.7.3 Excavator Obligation to Avoid Damage to Underground Pipelines.....	28
4.7.4 Handling Damaged Facilities:	30
4.8 Incident Information Card Guidelines.....	30



Damage Prevention Plan

Article 1 - Introduction and Scope

Introduction

This Damage Prevention Plan is prepared for West Texas Gas and its subsidiaries and/or affiliates (WTG). This written plan is to comply with the Code of Federal Regulation (CFR) Part 192 specifically CFR §192.614 and Part 195 specifically CFR §195.442. In addition, the Texas Administrative Code (TAC) Chapter 18: Underground Pipeline Damage Prevention, and Texas Utility Code Title 5 Chapter 251, are incorporated within this plan and are major parts of this program.

Scope

Damage Prevention and the understanding of excavation safety are essential to the continued safe operation of WTG facilities and pipelines. As part of the ongoing WTG Damage Prevention Program, WTG would like to ensure the safety of our facilities, customers, and communities; this includes identifying and validating existing best practices performed in connection with preventing damage to underground facilities.

WTG'S Damage Prevention Program and Public Awareness Program work together to provide increased public and environmental safety by providing an atmosphere which leads to trust and a good relationship between WTG and the public along the pipeline routes, acceptance of pipeline personnel while performing safety, maintenance and operations functions and other right-of-way activities, and the public's cooperation in assisting WTG to continue to operate a safe pipeline system. The continual process of development, implementation and evaluation is critical to the success of WTG's Damage Prevention Plan and public safety.



Damage Prevention Plan

Article 2 – Terms, Definitions, Acronyms, and Abbreviations

2.1 Terms / Definitions

Term	Definition
811	National Call Before You Dig telephone number federally mandated to eliminate the need to remember a state “One Call Center”. This is a toll free number.
Damage	Includes, but is not limited to: <ul style="list-style-type: none">• Defacing, scraping, displacement, penetration, destruction, or partial or complete severance of an underground pipeline or of any protective coating, housing, or other protective device of an underground pipeline;• Weakening of structural or lateral support of an underground pipeline that affects the integrity of the pipeline; or• Failure to properly replace the backfill surrounding an underground pipeline.
Demolish or Demolition	Any operation by which a structure or mass of material is wrecked, razed, rendered, moved, or removed by means of any tools, equipment, or discharge of explosives.
Emergency	A situation that endangers life, health, or property or a situation in which the public need for uninterrupted service and immediate re-establishment of service if services are interrupted compels immediate action
Excavate	Any operation in which earth, rock, or other material in the ground, any structure, or any mass of material is moved, removed, disturbed, or otherwise displaced by hand digging, mechanized equipment or tools of any kind, or explosives, and includes but is not limited to auguring, backfilling, boring, cable or pipe plowing and driving, compressing, cutting, demolition, digging, ditching, dragging, dredging, drilling, grading, plowing-in, pulling-in, razing, rendering, ripping, scraping, tilling of earth at a depth exceeding 16 inches, trenching, tunneling, or wrecking.
Hand Digging	Any movement of earth using non-mechanized tools or equipment, soft digging, or vacuum excavation. Hand digging includes but is not limited to digging with shovels, picks, and manual post-hole diggers.
Mechanized Equipment or Tool	A piece of equipment or a tool operated by mechanical power, including but not limited to a tractor, trencher, bulldozer, power shovel, auger, backhoe, scraper, drill, cable or pipe plow and/or driver, and other equipment used to plow in or pull in cable or pipe.
Near Miss	Any excavation on or around a pipeline and/or facility without the Operators knowledge or consent.
Notification	The completed delivery of information to the person to be notified, and the receipt of that information by that person in accordance with this chapter. The delivery of information includes but is not limited to the use of any electronic or technological means of data transfer.
Operator	A person who operates on his or her own behalf, or as an agent designated by the owner, a pipeline containing flammable, toxic, or corrosive gas, a hazardous liquid, or carbon dioxide.



Damage Prevention Plan

Term	Definition
Positive Response	Positive response--Notification to an excavator by markings left at an excavation site, or by fax, phone, e-mail, pager, or written correspondence that allows an excavator to know prior to the beginning of excavation that underground pipelines have been located and marked or that there are no underground pipelines in the vicinity of the excavation.
Spot Marking	Making a circle around the spot where excavation is to take place, typically used when standard marking techniques would be considered damaging to property or cannot be used because of limited space.
Tolerance Zone	Half the nominal diameter of the underground pipeline plus a minimum of 18 inches on either side of the outside edge of the underground pipeline on a horizontal plane.
Right of Way (ROW)	Defined land, on which an operator has the rights to construct, operate, and/or maintain a pipeline. This ROW may be owned outright by the operator or an easement may be acquired for its specific use.
White-Lining	An excavator's designation on the ground of the area to be excavated using white paint, white flags, white stakes, or any combination of these.

2.2 Acronyms / Abbreviations

The following acronyms are used throughout this manual:

Term	Definition
811	Toll Free National Call Before You Dig Number
APWA	American Public Works Association
O&M Manual	WTG Operations and Maintenance Manual
ROW	Right of Way
TRRC / RRC	Railroad Commission of Texas
TDRF	Texas Damage Report Form
WTG	West Texas Gas and its Subsidiaries and/or Affiliates



Damage Prevention Plan

Article 3 – Regulatory Compliance

3.1 Compliance

WTG will fully comply with the applicable federal and state regulations in which WTG owns and/operates pipeline facilities. These can be found in Article 1.1 Introduction of this plan.

3.2 Participation in Public Service Programs

WTG participates and is an active member with Texas 811.

3.3 Other Resource

Below is a list of websites that contain information regarding damage prevention and One Call notifications centers:

Texas 811	www.texas811.org
Call 811	www.call811.com
Texas Railroad Commission (TRC)	www.rrc.state.tx.us/
Texas Utilities Code / Texas Health and Safety Code	www.statutes.legis.state.tx.us/
US Department of Transportation / Pipeline Hazardous Material Safety Administration (PHMSA)	www.phmsa.dot.gov/
National Pipeline Mapping System (NPMS)	www.npms.phmsa.dot.gov
West Texas Gas	www.westtexasgas.com



Damage Prevention Plan

Article 4 – Damage Prevention Plan

4.1 WTG’s Obligation with Respect to Emergency Excavation Procedure:

This section applies whenever a situation endangers life, health or property; or damage to underground facilities or public infrastructure threatens or causes interruption of utility services or use of the public infrastructure.

4.1.1 Excavators: If West Texas Gas damages an underground facility while excavating:

1. Stop excavating immediately;
2. Move to a safe area away from the emergency
3. Call the operator of the damaged underground facility immediately;
4. If the damage results in the escape of any flammable, toxic or corrosive fluids/gases, WTG will notify the owner or operator of the utility or facility, and all other appropriate emergency response personnel (including 911, local law enforcement, and fire departments), before continuing any excavation.
 - a) WTG will take all actions that may be reasonably necessary to protect persons and property, and to minimize any hazards until the arrival of the owner or operator’s personnel and police and fire departments.
 - b) WTG will comply with any other notification process required by law or regulation.
5. As soon as possible, but not more than 1 hour, WTG must contact 811 to report damage.
6. Secure the site and direct people and traffic a safe distance away from the site of the damage;
7. Do not leave the scene until authorized by an emergency responder or the operator of the damaged underground facility; unless WTG has made reasonable, if unsuccessful, efforts to contact the affected pipeline operator and has safely secured the site;
8. Do not resume work within an unsafe distance of the damage until authorized by the operator of the damaged underground facility.

Note: WTG will allow the owner or operator of the affected facility reasonable time to accomplish the necessary repairs before continuing excavation.

WTG will not cover the exposed damaged pipeline without approval of the operator.

4.1.2 Operators of damaged underground facilities:

In the event WTG’s facilities are damaged, WTG will:

1. Promptly respond to a report of damage to WTG’s underground facilities
2. As soon as possible contact the one-call notification system and request an emergency locate for the site. (If WTG uses a third-party contractor to excavate the damaged pipeline, the third-party contractor must request a separate locate ticket)
3. Upon arrival secure the site and provide personal and public safety;
4. Locate underground facilities as soon as practical, ideally within two (2) hours; and



Damage Prevention Plan

5. If repair work exists beyond the emergency situation, obtain an excavation locate ticket for the remaining repair work.

Note: In the event of an emergency situation, excavation may begin immediately. Notice to the notification center must be given as soon as practical.

4.2 WTG's Obligation with Respect to Damage or Near Miss Reporting

4.2.1 Operator

- **Damage**

- WTG personnel shall utilize the Incident Information Card as described in Section 4.8, to gather information at an incident site to assist in reporting damages through the Commission's online system.
- Take pictures of the damaged pipeline and/or facility including the following:
 - i. Depth of damage
 - ii. Pictures which include original markings of pipeline (with stationary landmarks)
 - iii. Distance from damaged pipeline to actual markings
 - iv. Any other supporting pictures
- This information shall be submitted to the WTG Damage Prevention Coordinator
- Within 30 days of the damage incident, or of WTG's actual knowledge of the damage incident, the WTG Damage Prevention Coordinator will submit the information to the Commission through TDRF, which may be accessed through the Commission's online reporting system using WTG's assigned operator identification code.

- **Near Miss**

In the event WTG personnel observes, or is notified of, any excavation activity occurring on or around WTG pipelines and/or facilities without WTG's knowledge or consent, WTG will follow the steps below:

- WTG personnel shall utilize the Incident Information Card as described in Section 4.8, to gather information at an incident site to assist in reporting near misses to the WTG Damage Prevention Coordinator.
- The WTG Damage Prevention Coordinator shall keep records of any near miss activity that occurs. (See Section 4.4)

4.2.2 Excavator

- WTG personnel shall notify the operator of damage to an underground pipeline through



Damage Prevention Plan

the notification center immediately but not later than one hour following the damage incident.

- WTG personnel will then notify to the WTG Damage Prevention Coordinator of the damage
- The WTG Damage Prevention Coordinator shall submit a report of the damage incident to the Commission using a TDRF within 30 days of the incident.

4.3 WTG's Obligation with Respect to Updating Pipeline Maps with Applicable One Call Centers

Through WTG's participation in the Notification Centers listed in Section 3.3 of this plan, WTG is committed to maintaining up-to-date mapping with all applicable notification centers. WTG shall update, to the notification center, any changes to WTG's maps or grid locations as those changes occur. WTG follows specific processes which are detailed below:

4.3.1 Pipeline Location Corrections

- In the event WTG personnel discovers a segment of pipeline is not in the correct location or is missing from WTG's mapping program, the following steps shall be completed:
 - The District Manager, or their designee, shall submit the corrected route of the pipeline to the WTG mapping department.
 - WTG's mapping department will add the corrected route to the GIS mapping program.
 - Once this has been added to the GIS program, the WTG mapping department will ensure the corrected pipeline is adequately covered by the existing One Call grids.
 - If the WTG mapping department determines changes to the existing One Call grids are needed, these changes shall be made and submitted to the applicable One Call Center.

4.3.2 New Installations or Re-routes

- Prior to re-routing a pipeline system or installing a new pipeline system, where either extends outside of the existing One Call grids, WTG will ensure the following:
 - All District Managers or their designee, will submit a "Proposed" pipeline installation route to the WTG Mapping department
 - WTG's mapping department will add the "proposed" pipeline system to the GIS mapping program
 - Once added into the GIS system, WTG will ensure the "proposed" pipeline is buffered
 - WTG will submit the new pipeline buffer to the applicable One Call Center
- During the pipeline installation process if any deviation from the original "proposed" pipeline route is necessary, the District Manager, or their designee, will submit a revised pipeline route to the WTG mapping department. The WTG Mapping



Damage Prevention Plan

department will revise the route on the GIS mapping system, and if needed, will submit a newly revised buffer for the pipeline to the applicable One Call Center.

- After the pipeline installation has been completed and finalized, WTG will ensure the following is completed:
 - All District Managers or their designee, will submit a final copy of the completed project report (Form WTG 1400) to the WTG mapping department.
 - The WTG mapping department will ensure all data which is associated with the pipeline installation project has been completed correctly and added to the GIS mapping system.
 - Once this has been completed, if any changes are necessary to the One Call grids, the WTG mapping department will submit new buffers to the applicable One Call agency.

4.4 WTG's Obligation with Respect to Identifying Excavation Related Persons

WTG will prepare a list of individuals, who normally engage in excavation related activities in the vicinity of WTG's pipeline facilities, and, as required by API RP 1162, notify these excavators concerning the damage prevention program and its purpose. This notification will show the public how to learn the location of underground pipelines before excavation begins. This step may be accomplished through the excavator outreach programs conducted by the local One-Call system, by a third-party organization, and/or by direct mail-outs.

- The above-mentioned list will be generated from the following sources:
 - a. WTG will utilize data collected each calendar year from state One Call centers in which WTG operates a pipeline system.
 - b. WTG will also utilize data collected from a third-party organization that details excavators that have business addresses within 10 miles of our pipeline systems.
 - c. WTG will utilize data from all third party damage reporting forms submitted to the individual regulatory agencies.
 - d. WTG will utilize data from all Near Misses which have been reported to the WTG Damage Prevention Coordinator.
 - e. This list will be updated yearly and can be generated by the Damage Prevention Coordinator or the Public Awareness Administrator as requested.
- Within 10 days of the initial damage, near miss, or of the operator's actual knowledge of the damage incident or near miss, to any WTG facilities, WTG will send the excavator the same information contained in the Public Awareness notices and add the excavator to WTG's Excavation Related Persons List to ensure future communication.

4.5 WTG's Obligation with Respect to Record Retention

- WTG will keep a record of all locate tickets and positive response notifications for a minimum of four years and will have them available upon the request of the Commission.



Damage Prevention Plan

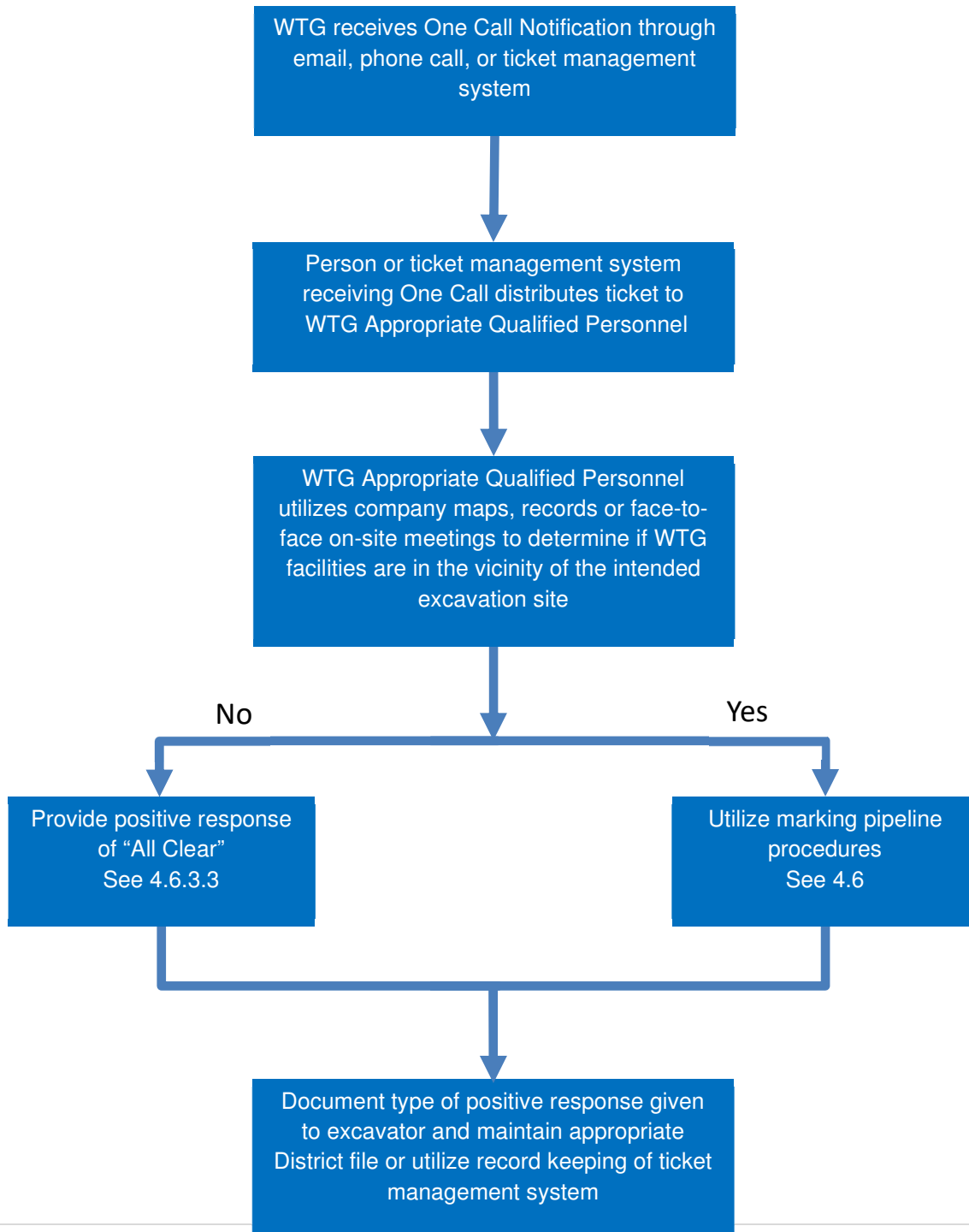
- WTG will maintain factual records when Company representatives request that excavation activities be delayed or stopped because of unauthorized excavation or other problems.
- WTG will maintain the records above for a longer time period in the event of litigation or other unresolved situations



Damage Prevention Plan

4.6 Pipeline Operator Damage Prevention Requirements

4.6.1 WTG's Obligation with Respect to Handling Locate Requests





Damage Prevention Plan

4.6.2 WTG's Obligation with Respect to Notifications Received

After receiving the request from the notification center, WTG shall supply the following information to the person responsible for the excavation:

- The specific location and type of all of its underground utilities or facilities which may be damaged as a result of the excavation.
- Type of temporary markings used to locate the utilities or facilities and how to identify the markings.

Note: Within the State of Texas the deadline to supply the above information is the following:

- No later than 48 hours after the time the excavator gives to the notification system notice of intent to excavate, excluding Saturdays, Sundays, and legal holidays
- 11:59 a.m. on the Tuesday following a Saturday notification unless the intervening Monday is a holiday;
- 11:59 a.m. on the Wednesday following a Saturday notification if the intervening Monday is a holiday; or
- A time agreed to by the operator and the excavator.

In the event that WTG feels the need for a qualified WTG employee to be on-site during any excavation activity, WTG shall notify the excavator of their intent to be on-site during the excavation. If the excavator determines a need to change the excavation start time, the excavator shall notify WTG to set a mutually agreed upon start time.

In the event WTG should be contacted by an excavator in accordance with section 4.7.2 (*Options for Managing an Excavation Site in the Vicinity of an Underground Pipeline*) of this plan, WTG shall work with the excavator to ensure compliance.

4.6.2.1 Extraordinary Circumstances

The above deadlines do not apply if WTG experiences an extraordinary circumstance due to an act of God, including a tornado, a hurricane, an ice storm, or a severe flood, or a war, riot, work stoppage, or strike that limits personnel or resources needed to fulfill these obligations.

WTG will notify the notification center(s), within the State of Texas, of the extraordinary circumstance, and that it is impossible to mark our underground facilities at this time. The notification shall include:

- The nature and location of the extraordinary circumstance;



Damage Prevention Plan

- The expected duration of the situation and the approximate time at which WTG will be able to resume location request activities; and
- The name and telephone number of the individual that the notification system can contact if there is an emergency that requires WTG's immediate attention.

In addition to contacting the notification center, WTG shall also notify each excavator that has a pending location request in the area where an extraordinary circumstance is being experienced and include in the notification:

- The fact that WTG is experiencing an extraordinary circumstance; and
- The approximate time at which the operator will mark the requested location.

4.6.3 WTG's Obligation with Respect to Marking Underground Pipelines:

- Marking the underground pipelines in accordance with the following or:
 - Markings that conform to the requirements of American Public Works Association (APWA) Uniform Color Code (ANSI Standard Z535.1, Safety Color Code.).

Red	Electric power lines, cables, conduit, and lighting cables
Orange	Telecommunication, alarm or signal lines, cables, or conduit
Yellow	Natural gas, oil, steam, petroleum, or other gaseous or flammable material
Green	Sewers and drain lines
Blue	Drinking water
Violet	Reclaimed water, irrigation, and slurry lines
Pink	Temporary survey markings, unknown/unidentified facilities
White	Proposed excavation limits or route

- Markings are valid at the excavation site for 14 days from the time a positive response is given, unless they are placed in an emergency and the emergency condition has ceased to exist.
- If the line marking may permanently damage property (driveways, landscaping, historic locations to the extent boundaries are known), a locator will use spot marking or other suitable marking methods.
- In event locate request is refreshed, WTG is required to ensure markings are still visible or will remark facilities.



Damage Prevention Plan

- WTG shall maintain a record of each positive response given to an excavator regarding each line locate ticket received.

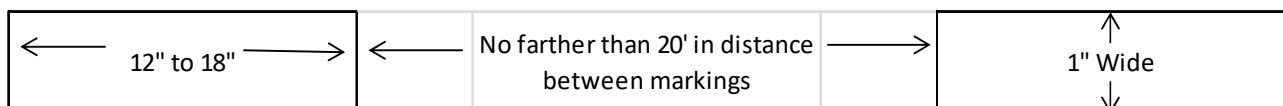
4.6.3.1 Marking Requirements

- A locator will use all information necessary to mark underground pipelines accurately. These will include available facility records and maps and a visual inspection of the excavation area to determine if there is evidence of other pipelines.
 - If during the location, the locator determines there are omissions in the records, they will notify the WTG Mapping Department to have these corrections made.
- If in the process of marking underground pipelines, the locator discovers a customer-owned or other underground pipeline(s), he will make a reasonable effort to advise the excavator of the pipeline.
- The locator will mark the approximate center line of WTG's underground pipeline.
- If the proposed excavation crosses an underground pipeline, markings will be at intervals that clearly define the route of the underground pipeline, to the extent possible. See Guidelines for Operator's Facility Field Delineation in section 4.6.3.2 of this procedure.
- The locator will mark underground pipelines using stakes, paint, flags, or a combination of two or more of these. The terrain, site conditions and type and extent for the proposed excavation will be considered in determining the most suitable means for marking the pipeline. See Guidelines for Operator's Facility Field Delineation in section 4.6.3.2 of this procedure.
- The locator will mark the pipeline at sufficient intervals, not to exceed 20 feet, to indicate clearly the approximate horizontal location and direction of the underground pipeline.
- Marking of pipelines greater than 6 inches in diameter will include the size at every other mark.
- The locator will extend all markings, if practical, at least one additional mark beyond the boundaries of the specific location of the proposed work as detailed on the line locate ticket.

4.6.3.2 Guidelines for Operator's Facility Field Delineation

WTG markings of facilities include; yellow markings (paint, flags, stakes, or a combination of two or more); company identifier (name, initials, or abbreviation) when other companies are using the same color, the number and width of the facilities and a description of the facility (G for Gas) will be included with the markings.

Marks in yellow paint are to be approximately 12" to 18" in length and 1" in width and separated by no more than 20' in distance. When marking our facilities WTG will consider the terrain of the land, the type of excavation being done and the method to adequately mark its facilities for the excavator.

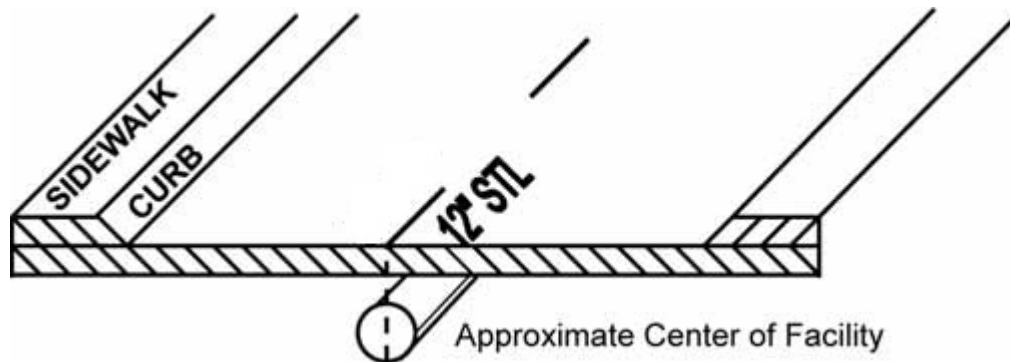




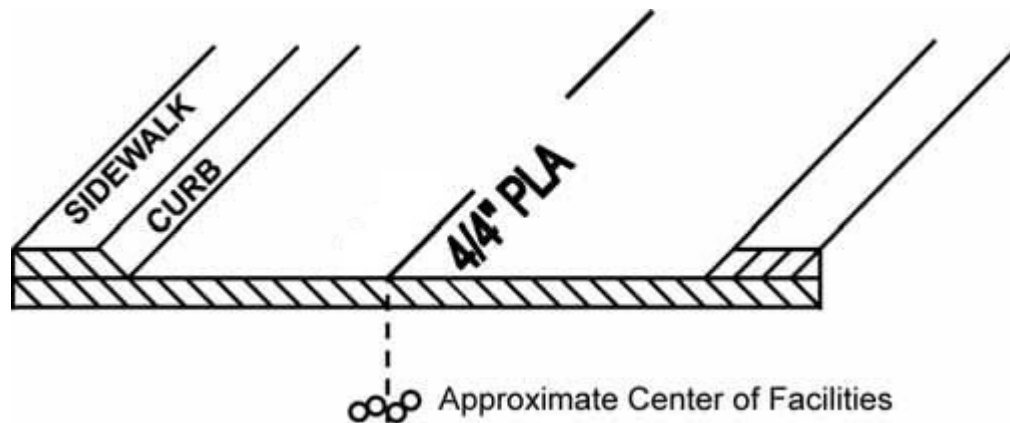
Damage Prevention Plan

The following marking illustrations are examples of how WTG may choose to mark their subsurface installations

- **Single Facility Marking:** Used to mark a single facility, marks are placed over the approximate center of the facility. This example indicates an operator's 12" facility. When a facility can be located or toned separately from other facilities of the same type it is marked as a single facility.



- **Multiple Facility Marking:** Used to mark multiple facilities of the same type (e.g. electric), where the separation does not allow for a separate tone for each facility but the number and width of the facilities is known. Marks are placed over the approximate center of the facilities and indicate the number and width of the facilities. This example indicates 4 plastic facilities that are 4" in diameter (4/4" PLA).

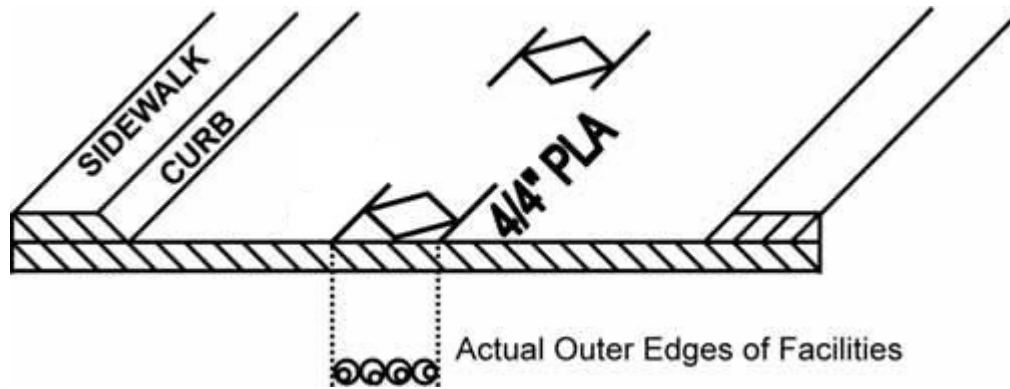


- **Conduit Marking:** Used for any locatable facility being carried inside conduits or ducts. The marks indicating the outer extremities denote the actual located edges of the facilities being

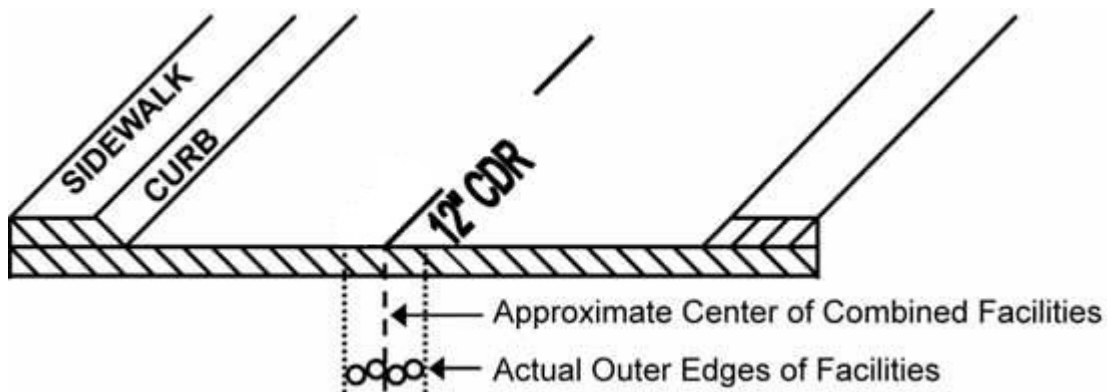


Damage Prevention Plan

represented. An example would be 4 plastic conduits that are 4" in diameter (4/4" PLA), and the marks are 16" apart indicating the actual left and right edges of the facilities.



- Corridor Marking: Used to mark multiple facilities of the same type (e.g. electric), in the same trench where the total number of facilities is not readily known (operator has no record on file for the number facilities) and that are bundled or intertwined. Marks are placed over the approximate center of the facilities and indicate the width of the corridor. The width of the corridor is the distance between the actual located outside edges of the combined facilities. This example indicates a 12" corridor (12" CDR).

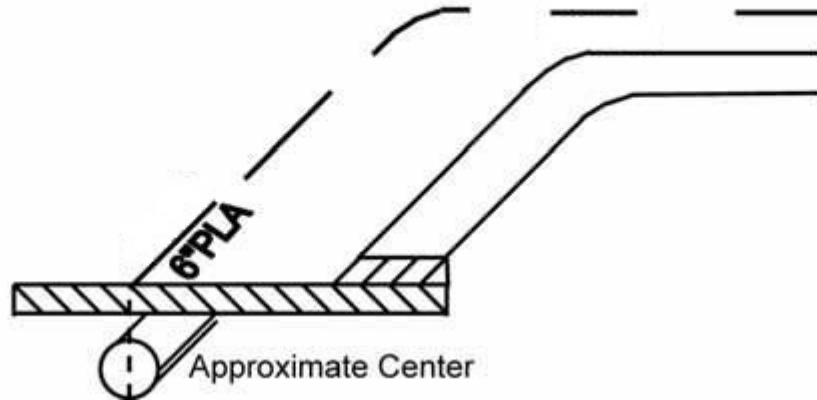


Changes in direction and lateral connections are to be clearly indicated at the point where the change in direction or connection occurs with an arrow indicating the path of the facility. A radius is indicated with marks describing the arc. When providing offset markings, (paint or stakes), show the direction of the facility and distance to the facility from the markings.

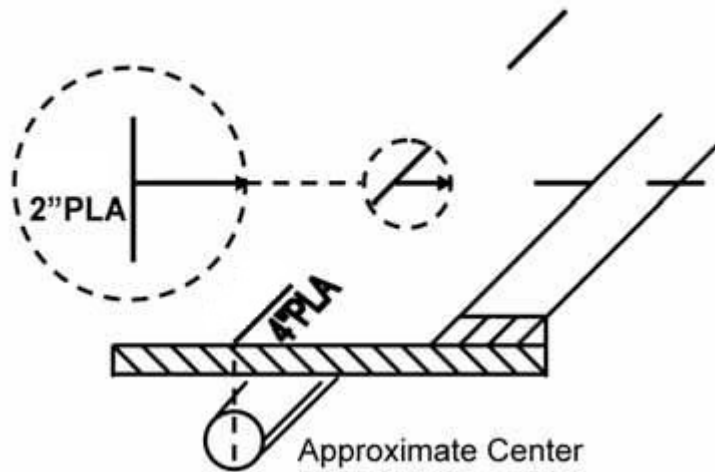


Damage Prevention Plan

Radius Example!



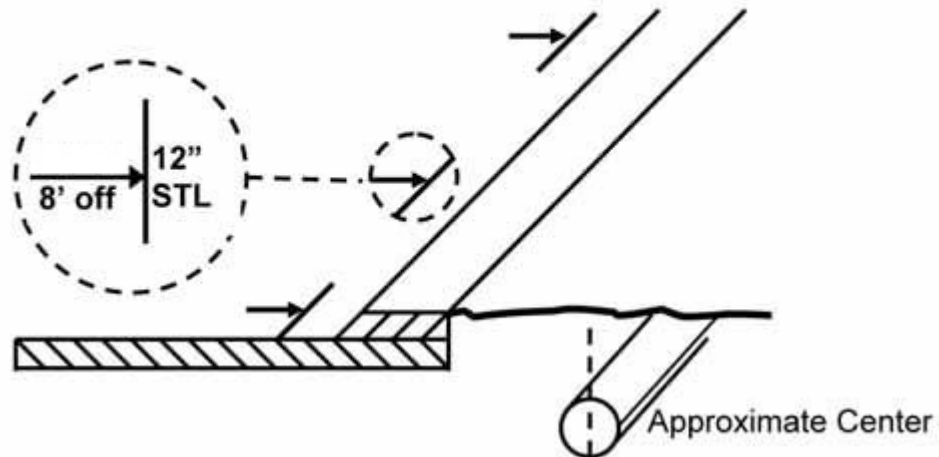
Lateral Connection Example!



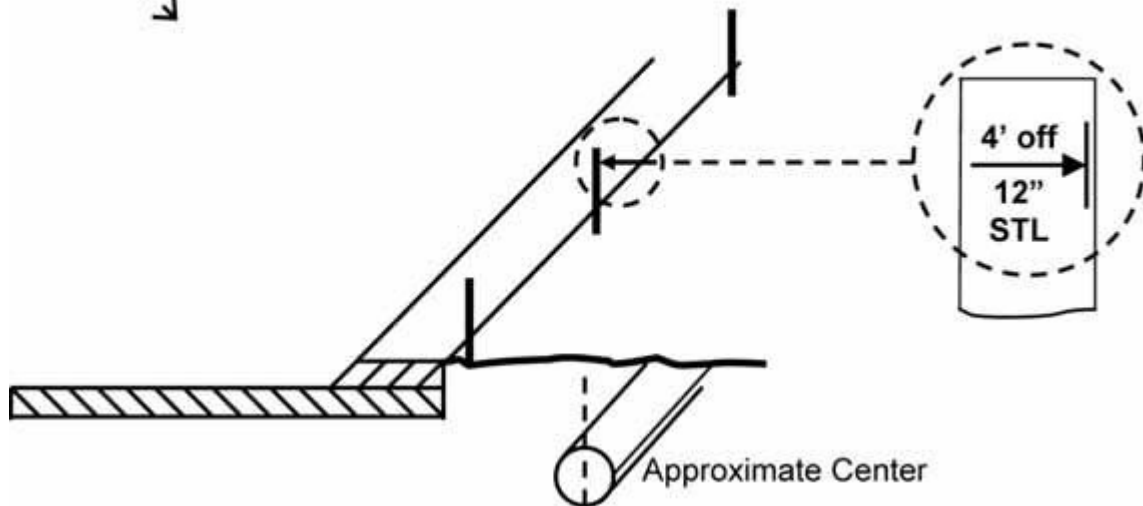


Damage Prevention Plan

Painted Offset (off) Example!



Staked Offset (off) Example!



WTG's identifier (name, abbreviation or initials) is to be placed at the beginning and at the end of the proposed work. In addition to the previous, subsequent operators using the same color will mark their company identifier at all points where their facility crosses another operator's facility using the same color. The maximum separation of identifiers is to be reduced to a length that can be reasonably seen by the excavator when the terrain at the excavation site warrants it.

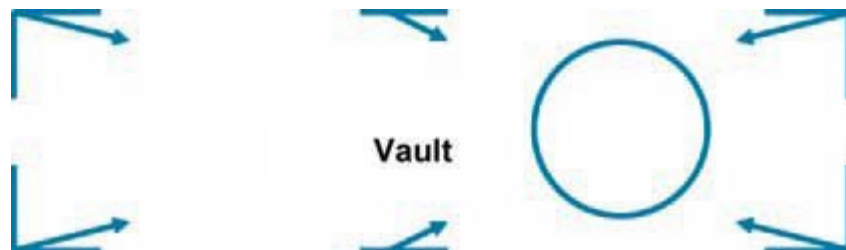


Damage Prevention Plan

Information as to the size and composition of the facility is to be marked at an appropriate frequency. Examples are: width of a pipeline, and whether it is steel, plastic, etc.

Facilities installed in a casing should be identified as such. An example is: 6" plastic in 12" steel = 6"PLA/12"STL.

Structures, such as vaults, inlets, lift stations that are physically larger than obvious surface indications, are to be marked so as to define the parameters of the structure.



Termination points or dead ends are to be indicated as such.



4.6.3.3 WTG's Obligation with Respect to "No Conflict" Markings:

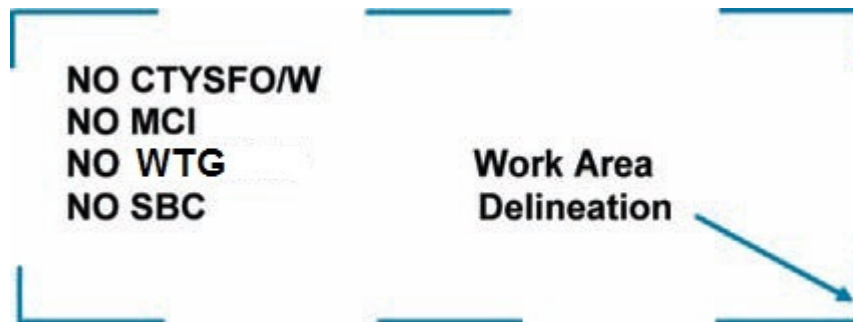
When there is "No Conflict" with the excavation complete one or more of the following:

- Mark the area "NO" or "No Conflict" followed by the appropriate company identifier in the matching APWA color code for that facility (e.g. "NO WTG" in yellow).
- If it can be determined through maps or records that the proposed excavation is obviously not in conflict with WTG's facilities, WTG shall notify the excavator of "No Conflict" by phone, fax, or email.

*Caution - Allow adequate space for all facility mark-outs. "No Conflict" indicates; that the operator providing the "No Conflict" has no facilities within the scope of the delineation, or when there is no delineation, there are no facilities within the work area as described on the locate ticket.



Damage Prevention Plan



4.6.4 WTG's Obligation with Respect to Pipelines that Could be Damaged during Excavation

- In the event WTG feels there could be damage to one or more of their underground pipelines and/or facilities resulting from excavation activities, WTG shall perform routine inspections on the pipeline to verify the continued integrity of the pipeline.
- In the event of blasting, the inspections will include the use of leakage surveys.

4.6.5 WTG's Obligation with Respect to Procedures for Un-Locatable Pipelines

4.6.5.1 Description:

This section of the procedure describes the line locate requirements for planned excavation activities along unmarked, unmapped plastic distribution pipelines without means of traceable wire or tape. These planned excavation notices should be received via the "One-Call" system.

4.6.5.2 Procedure Steps:

Once notification is received of a planned excavation in the vicinity of one or more of WTG's pipelines, which cannot be located by standard procedures, notify the excavator that the pipeline cannot be accurately marked.

Ask Excavator to meet on-site to discuss the proposed project. Determine the purpose, depth and direction of the planned excavation.

WTG personnel qualified in line locating will make every effort to locate and mark the pipe. If the pipeline is in such a rural area that there is absolutely no evident means to determine the location; company maps, historical data, field knowledge, locating equipment and experience will be utilized to determine the general location and depth of the pipe within the vicinity of the excavation.

Inform Excavator why the pipe cannot be accurately marked. Make sure the Excavator is aware of the pipe material, pressure, and direction of flow.

WTG personnel will take steps to shut-in gas supply and isolate the segment of pipeline or lower the pressure to a minimum during excavation.



Damage Prevention Plan

Inform Excavator, that in this case, qualified WTG personnel must be on-site during excavation. WTG personnel will assist in every way possible to help locate pipe during excavation.

WTG personnel will have equipment and materials necessary to repair the pipe if damaged.

If the pipeline is damaged during excavation, WTG personnel will follow proper actions and procedures to shut down and/or repair pipe and reinstate service.

4.6.5.3 Responsibility:

If the pipeline is damaged after following these procedures it will be the responsibility of WTG to repair and burden the cost of repairs and gas loss.

4.6.5.4 Documentation:

If during excavation activities the pipeline is located, WTG personnel will do the following:

- Install an approved marker ball directly over the un-locatable pipeline.
- Fill out an exposed pipeline report (WTG 1100) to record pertinent information such as GPS coordinates, material, size, depth, condition, etc.
- Fax or email the exposed pipeline report to the WTG Mapping Department.
- WTG Mapping department will, if warranted, correct the location of the pipeline on the digital mapping program and add an information marker that will show all data collected on the exposed pipeline report.

If the pipeline is damaged during excavation, then all necessary forms and reports including the required TDRF will be filed and submitted.

4.6.6 Directional Drilling and Trenchless Technology Operations

Special precautions shall be taken to protect pipelines and other underground facilities from damage associated with directional drilling and other trenchless technology operations (drilling or boring).

- Any and all underground facilities that have the potential to be affected by drilling or boring operations shall be reviewed and if necessary excavated in the proximity of these operations to ensure that adequate clearance is achieved between the underground facility and the drilling/boring equipment.
- Qualified personnel shall be on-site during excavation of WTG facilities and during critical times of potential contact of drilling or boring equipment with WTG facilities.
- In the case of contractors performing drilling or boring operations for WTG, qualified WTG personnel shall ensure that the contractor performs a thorough site survey of the area of the proposed drilling or boring operations to locate potential contacts with boring or drilling equipment.



Damage Prevention Plan

4.6.7 WTG's Obligation in the Event a Pipeline was Unmarked/Mismarked

If, prior or during excavation, it is determined WTG has an unmarked or mismarked facility that may exist, WTG will mark or clear the area as soon as possible after being contacted by the excavator.

4.6.8 WTG's Obligation with Respect to Photographing Completed Line Locate

Once the line locate has been completely and properly marked, WTG personnel will take photographs of the located area using the following procedures:

- All photographs will need to include a date and time stamp on the picture
- Photographs shall include a clear picture of the entire line locate, which should include visual stationary landmarks.
- All photographs shall be kept on hand in each individual district for a minimum of 30 days following the expiration of that locate request.
 - If no damages occur within this time frame, photographs may then be discarded.

4.6.9 Reporting Requirements

Report to the Commission all damage to pipelines caused by an excavator within 30 days of the damage incident or actual knowledge of the damage incident. This is to be submitted through TDRF, which may be assessed at <http://www.rrc.state.tx.us/formpr/index.html> using our assigned identification code.



Damage Prevention Plan

4.7 Excavator Damage Prevention Requirements

4.7.1 Excavator Notice to Notification Center

1. Prior to the commencement of any excavation, WTG will notify the notification center (811) of its intent to excavate within the following time frames:
 - This notice shall be given at least 48 hours but not more than 14 working days, excluding weekends and holidays, in advance of the commencement of an excavation activity.
 - Holidays shall consist of the following: New Year's Day; Martin Luther King Jr Day; Confederate Heroes Day; President's Day; Texas Independence Day; San Jacinto Day; Memorial Day; Emancipation Day in Texas; Independence Day; Lyndon B Johnson Day; Labor Day; Veterans Day; Thanksgiving Day; Day after Thanksgiving Day; Christmas Eve and Christmas Day, and Day after Christmas Day.
2. WTG's notice to the notification center will include the following:
 - Name, address, and telephone number(s) of the person filing the notice of intent, or the person responsible, if different, for the excavation
 - Starting date, anticipated duration, and description of the type of excavation to occur
 - Specific location of the proposed excavation, including street address, if available.
 - If no street address is available, include accurate description using available designations such as closest street, road, or intersection
 - Statement as to whether directional boring or explosives are to be used
 - Contact information for how WTG will receive a response from the operator
3. If the excavation is part of a larger project, the locate request shall be confined to the actual area of the proposed excavation that will occur during the 14 day time period.
4. Determine if the excavation site can be clearly described on the line locate ticket and will be clearly identifiable; if not use white-lining to mark the excavation area prior to giving notice to the notification center and before the locator arrives on the excavation site.
 - Mark the area of excavation using intervals that show the direction of the excavation



Damage Prevention Plan

5. Provide in the notice the method or methods by which WTG will receive a positive response. This may include, but is not limited to:
 - Telephone
 - Fax
 - Email
6. WTG shall maintain a record of each operator's positive response regarding each excavation notification.
7. If an excavation project is too large to mark using white-lining or is so expansive that a full description cannot be provided on a line locate ticket, then conduct a face-to-face meeting with the operator to discuss the excavation activities and to establish protocols for:
 - The interval between each notice to the notification center;
 - The scope of each line locate ticket;
 - The life of each line locate ticket; and
 - The schedule of work on the excavation and the chronological order in which applicable locate tickets are to be marked.
8. WTG shall wait at least 48 hours, following the notification before any excavation can begin, except in the case of an emergency, where excavation may begin immediately, providing reasonable precautions have been taken to ensure the protection of all underground facilities.
9. If an excavation project is not completed within the required 14 working days, or the markings are no longer visible, refresh the ticket by contacting the notification center again. Limit the refresh area to the area yet to be excavated.

4.7.2 Options for Managing an Excavation Site in the Vicinity of an Underground Pipeline

- After complying with the notice requirements of the Excavator Notice to Notification Center section of this procedure, jointly establish, if applicable, with the operator, the protocols applicable to an excavation site in the vicinity of underground pipelines based on the particular characteristics of each job. The protocols applicable to an excavation site may:
 - Designate the contact person or persons for each entity working at an excavation site;
 - Establish the required mode or modes of communication among all entities working at an excavation site, e.g., telephone or other electronic means or face-to-face meetings at prescribed times or intervals;
 - Provide the method for coordinating work activities among all entities working at an excavation site;



Damage Prevention Plan

- Provide for the ownership and/or possession of the locate ticket or tickets;
 - Declare which entity or entities must have the locate ticket or locate ticket number before beginning work;
 - State the life of a locate ticket is not to exceed 14 working days and the circumstances that require refreshing the locate ticket;
 - State the schedule of work on the excavation and, if applicable, the chronological order in which applicable locate tickets are to be located;
 - Designate the extent of the tolerance zone, provided that it shall not be less than half the nominal diameter of the underground pipeline plus a minimum of 18 inches on either side of the outside edge of the underground pipeline on a horizontal plane and the type of excavation permitted within the tolerance zone; and
 - Provide for any other agreement with respect to excavation activities and/or marking requirements that will or will tend to ensure the proper and safe excavation in the vicinity of an underground pipeline.
- Once these protocols are established, make and retain a record of the agreement.

4.7.3 Excavator Obligation to Avoid Damage to Underground Pipelines

- Comply with the requirements relating to Excavator Notice to Notification Center listed in Section 4.7.1.
- WTG will not perform any construction activity on, across, over, or under an easement or right-of-way of a pipeline facility without first providing notice to the operator of that facility and:
 - The operator determines the intended construction will not increase the risk to the public or a risk to the pipeline facility;
 - The construction activity is conducted under a mutual agreement, or;
 - The construction activity is required to be done promptly due to a natural disaster.
- Plan an excavation in such a manner as to avoid damage to and minimize interference with all underground pipelines in the vicinity of the excavation area.
- Take all reasonable steps to protect underground pipelines from damage.
- Before beginning any excavation activity, WTG shall wait the required time frames listed below:
 - No less than 48 hours excluding Saturdays, Sundays and legal holidays;
 - 11:59 a.m. on the Tuesday following a Saturday notification unless the intervening Monday is a holiday;
 - 11:59 a.m. on the Wednesday following a Saturday notification if the intervening Monday is a holiday; or
 - An excavation start time agreed to, in writing, by the operator and the excavator.



Damage Prevention Plan

- Prior to excavation, confirm that a copy of a valid locate ticket for the location is in the possession of WTG's designated representative and can be obtained upon request from the operator or the Commission.
- Prior to excavation, verify correct location as specified on the locate ticket; verify white-lining; and make a visual check for any unmarked underground pipelines. Checking for unmarked underground pipelines includes, but is not limited to, looking for additional pipeline line markers, such as painted fence post-type markers, aboveground pipeline valves, meter sets, regulator stations, or rectifier units.
- Do not begin excavating until a second notice is given to the notification center for the area if:
 - WTG has knowledge of the existence of an underground pipeline and has received an "all clear" or a "no conflict" response from an operator;
 - WTG observes clear evidence (such as a line marker or an above-ground fixture) of the presence of an unmarked underground pipeline in the area of the proposed excavation, and has received an "all clear" or a "no conflict" response from an operator;
 - There is no positive response for the excavation area; or
 - The positive response is unclear or obviously erroneous (for example, for a different location or for a different type of underground facility).
- After giving a second notice, wait 4 hours, then if there is no positive response take reasonable steps to identify communicate with unmarked pipeline operators. This may include calling the number listed on the aboveground pipeline marker sign. After all reasonable efforts have been taken and no positive response has been given, proceed with excavation using due caution.
- WTG personnel shall report any operators that do not provide a positive response to a first and/or second notice from the Notification Center immediately to the WTG Damage Prevention Coordinator. The WTG Damage Prevention Coordinator shall file a TDRF with the RRC within 10 days of being notified.
- Protect and preserve locate markings from the time work begins until markings are no longer required for the proper and safe excavation in the vicinity of all underground pipelines. If excavation activities cannot proceed without obliterating all or some of the markings made by a pipeline operator, WTG personnel shall provide temporary offset marks or stakes to retain the information regarding the location of each operator's underground facilities.
- Excavation within Tolerance Zone
 - When excavation is to take place within the specified tolerance zone, WTG will exercise such reasonable care as may be necessary to prevent damage to any underground pipeline in or near the excavation area. Methods to consider, based on certain climate or geographical conditions, include hand digging when practical, soft digging, vacuum excavation methods, pneumatic hand tools. Other mechanical methods or other technical methods that may be developed may be used with the



Damage Prevention Plan

approval of the underground pipeline operator. Hand digging and non-invasive methods are not required for pavement removal.

4.7.4 Handling Damaged Facilities:

If an excavation operation results in damage to an underground facility, WTG shall do the following:

- WTG shall, as soon as practical, contact the underground facility operator, if known, to report the damage; and
- Notify the notification center as soon as practical, but within 1 hour, of any damage to an underground facility.

Immediately upon receiving notification, each notification center will contact each member operator that has underground facilities in or near the area in which the damage occurred.

Only the operator or a person authorized by the operator may perform repairs, and the repairs will be made in an expeditious manner.

WTG will delay backfilling in the immediate area of the damage until the damage is reported to the operator and a repair schedule is mutually agreed to by WTG and the operator.

If damage endangers life, health, or property because of the presence of flammable material, WTG will keep sources of ignition away.

Within 30 days of the damage, WTG will report to the Railroad Commission through the TDRF, which may be accessed at <http://www.rrc.state.tx.us/formpr/index.html> and the excavator sign-in

4.8 Incident Information Card Guidelines

The Railroad Commission of Texas (RRC) has developed an Incident Information Card to be used by operators at an incident site to assist in reporting damages through the Commission's on-line system. This card contains basic information that is required in a damage report and will help operators efficiently gather data at an incident scene. The card is in a carbon copy format. The operator will fill out their top copy and have the excavator sign it. Signing the card is a notification of receipt only and does not indicate fault. The carbon copy will then be given to the excavator to use when filing out an excavator damage report.

The operator must retain a copy for their records and give the excavator a copy or carbon copy along with the filing instructions.



Damage Prevention Plan

The Incident Information Card is a two-part combination.

Part one: Is the top part, and the original copy. This is the operator's copy. This part should be printed on carbon paper; nothing should be printed on the backside of this part. This part contains the information that will be filled out by the operator at an incident site.

Part two: Is the bottom part, and the carbon copy. This is the excavator's copy. This part should be printed on carbon hard stock paper. The front part of this card is exactly the same as part one (the incident information). The filing instructions should be printed on the back of part two only.

The size of the RRC's card is 7.5" X 4". The size of the card does not need to be exactly as the RRC's, as long as it is legible. Any color paper may be used as long as it is in a contrasting color from the text color and it's legible.

A sample of the text on this card may be found on the following page.



Damage Prevention Plan

DIG SAFELY

Texas Pipeline Damage Prevention Program

INCIDENT INFORMATION CARD

Date of Incident:	Time of Incident:
Operator:	
Operator Contact:	
Operator Phone No.:	Operator Leak No.:
Incident Address:	
City:	County:
Locate Ticket No.:	Confirmation No.:
GPS Coordinates (Decimal Degrees Nad 83)	
Lat: _____	
Long: _____	
Excavator Name:	
Excavator Address:	
Excavator Phone Number:	
Excavator Signature:	
Operator Rep. Signature:	

NOTE: Signing this card verifies receipt of notice only, it does not indicate fault.



Know what's below.
Call before you dig.

or 1-800-545-6005

LATHAM PRINTING - (432) 333-1292