

West Texas Gas Utilities, LLC and its Subsidiaries and/or Affiliates

KANSAS DAMAGE PREVENTION PLAN

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

WTG Hugoton, LP. 32314

Feb 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
July 2014	0	Additions / Corrections throughout the entire program	Complete revision of entire Damage Prevention Plan. WTG Hugoton's existing Damage Prevention plan was lacking in several areas and failed to meet the required regulations.
Feb 2022	1	Parent Organization Name Change	Parent Organization Name Change



	f Contents	
Reviev	w and Revision Log	2
Article 1	Introduction and Scope	5
1.1	Introduction	
1.2	Scope	
	•	
Article 2	Terms, Definitions, Acronyms, and Abbreviations	6
2.1	Terms / Definitions	
2.2	Acronyms / Abbreviations	7
Article 3	Reguatory Compliance	8
3.1	Compliance	
3.2	Participation in a Public Service Program	
3.3	Other Resources	
Article 4	Damage Prevention Plan	
4.1	Emergency Excavation Procedure	
	4.1.1 As an Excavator	
	4.1.2 As an Operator	
4.2	Damage or Near Miss Reporting	
	4.2.1 As an Operator	
4.0	4.2.2 As an Excavator	
4.3	Updating Pipeline Maps to One-Call Centers 4.3.1 Pipeline Location Corrections	
	4.3.2 New Installations / Re-Routes	
4.4	Excavation Related Persons	
4.5	Record Retention	
4.5 4.6		
4.0	Pipeline Operator Damage Prevention Requirements	13 19
	4.6.2 Notification Received	
	4.6.2.1 Extraordinary Circumstances	
	4.6.3 Marking Underground Pipelines	
	4.6.3.1 Marking Requirements	
	4.6.3.2 Operator's Facility Field Delineation	
	4.6.3.3 No Conflict Markings	23
	4.6.4 Pipelines that Could be Damaged During Excavation	
	4.6.5 Directional Drilling and Trenchless Technology	
	4.6.6 Unmarked / Mismarked Pipelines	
	4.6.7 Photographing Completed Line Locates	
4.7	4.6.8 Reporting Requirements	
4.7	Excavator Damage Prevention Requirements 4.7.1 Notice to Notification Center	
	4.7.2 On Site Meetings	
	4.7.3 Managing an Excavation Site	
	4.7.4 Avoid Damage to Underground Pipelines	
	4.7.5 Excavation within the Tolerance Zone	
	4.7.6 Pre-Engineered and Permitted Projects	
	4.7.7 Handling Damaged Facilities	



4.8	Incident Information Card	32
Appendix	A: Excavation Related Persons List	33



Article 1 – Introduction and Scope

1.1 Introduction

This Damage Prevention Plan is prepared for WTG Hugoton, LP (WTGH). This written plan is to comply with the Code of Federal Regulation (CFR) Part 192 specifically CFR §192.614. In addition the Kansas Statutes Chapter 66: Public Utilities, Kansas Underground Damage Prevention Utility Act, are incorporated within this plan and are major parts of this program.

1.2 Scope

Damage Prevention and the understanding of excavation safety are essential to the continued safe operation of WTGH facilities and pipelines. As part of the ongoing WTGH Damage Prevention Program, WTGH 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.

WTGH'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 WTGH 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 WTGH to continue to operate a safe pipeline system. The continual process of development, implementation and evaluation is critical to the success of WTGH's Damage Prevention Plan and public safety.



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: 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. 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.



Term	Definition
Positive Response	Positive responseNotification 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.
Tier 1 and Tier 2 Facilities	Tier 1 – Underground facility used for transporting, gathering, storing, conveying, transmitting or distributing natural gas, electricity, communications, crude oil, refined or reprocessed petroleum, petroleum products, or hazardous liquids Tier 2 - Underground facility used for transporting, gathering, storing, conveying, transmitting or distributing potable water or sanitary sewage
Tolerance Zone	No less than 24 inches, but no more than 25 inches on either side of the outside edge of the underground pipeline in all horizontal directions of a Tier 1 facility; and 61 inches of a Tier 2 facility.
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 / AbbreviationsThe 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
ксс	Kansas Corporation Commission
TDRF	Damage Report Form



Term	Definition	
WTG	West Texas Gas and its Subsidiaries and/or Affiliates	
WTGH	WTG Hugoton, LP.	

Article 3 – Regulatory Compliance

3.1 Compliance

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

3.2 Participation in Public Service Programs

WTGH participates and is a member of the following Qualified Public Service Programs (One Call Centers):

Kansas One Call

3.3 Other Resource

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

Kansas One Call	www.kansasonecall.com
Call 811	www.call811.com
Kansas Corporation Commission	www.kcc.state.ks.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



Article 4 - Damage Prevention Plan

4.1 WTGH'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 As an Excavator: If WTGH damages an underground facility while excavating:

- 1. Stop excavating immediately;
- 2. Move to a safe area away from the emergency
- 3. Call 911, if appropriate, and/or the operator of the damaged underground facility immediately;
 - a) If the protective covering of an electrical line is penetrated or dangerous gases or fluids are escaping from a broken line, WTGH shall immediately inform emergency personnel of the operational area, in which such electrical short or broken line is located.
- 4. Secure the site and direct people and traffic a safe distance away from the site of the damage;
- 5. Do not leave the scene until authorized by an emergency responder or the operator of the damaged underground facility; unless WTGH has made reasonable, if unsuccessful, efforts to contact the affected pipeline operator and has safely secured the site:
- 6. Do not resume work within an unsafe distance of the damage until authorized by the operator of the damaged underground facility.

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

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

4.1.2 As an Operator of damaged underground facilities:

WTGH will:

- 1. Promptly respond to a report of damage to WTGH's underground facilities
- 2. As soon as possible contact the one-call notification system and request an emergency locate for the site. (If WTGH 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
- 5. If repair work exists beyond the emergency situation, obtain an excavation locate ticket for the remaining repair work.



In the event a WTGH pipeline or facility is in the vicinity of an Emergency Condition:

1. Once a notification has been received, WTGH shall make every reasonable effort to identify the location of its pipelines and/or facilities within two hours or before excavation is scheduled to begin.

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

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

4.2.1 As an Operator:

Damage

- WTGH personnel shall utilize the Incident Information Card as described in Section 4.8, to gather information at an incident site.
- This information shall be submitted to the WTG Damage Prevention Coordinator

Near Miss

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

- WTGH 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 As an Excavator:

 All information regarding the damaged facility shall be reported to the WTG Damage Prevention Coordinator



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

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

4.3.1 Pipeline Location Corrections

- In the event WTGH 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, WTGH 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, WTGH will ensure the "proposed" pipeline is buffered
 - WTG's Mapping Department 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 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, WTGH 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 WTGH'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 WTGH'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 though 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 WTGH 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 found in Appendix A of this plan.
- Within 30 days of the initial damage, near miss, or of the operator's actual knowledge of the damage incident or near miss, to any WTGH 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.

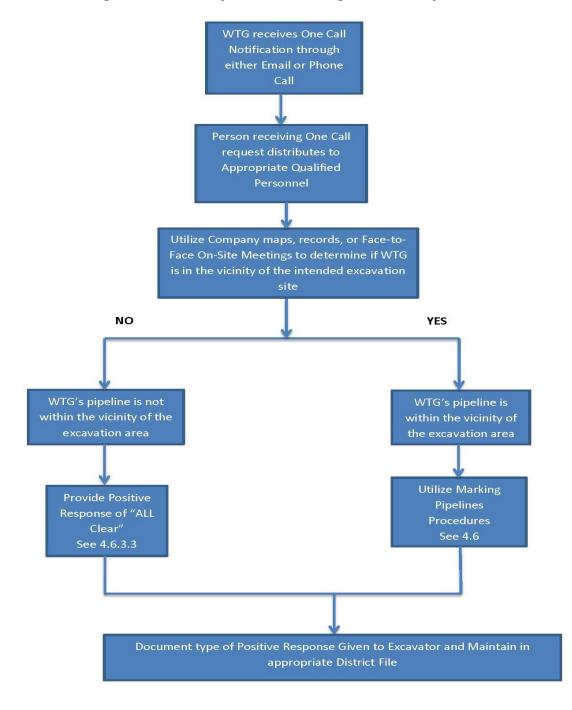
4.5 WTGH's Obligation with Respect to Record Retention

- WTGH will keep a record of all locate requests and excavation notices for one year, and will have them available upon request of the Commission
- WTGH will maintain factual records when Company representatives request that excavation activities be delayed or stopped because of unauthorized excavation or other problems
- WTGH will maintain the records above for a longer period of time in the event of litigation or other unresolved situations.



4.6 Pipeline Operator Damage Prevention Requirements

4.6.1 WTGH's Obligation with Respect to Handling Locate Requests





4.6.2 WTGH's Obligation with Respect to Notifications Received

After receiving the request from the notification center, WTGH 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 or demolition.
- Type of temporary markings used to locate the utilities or facilities and how to identify the markings.

In the event the request from the notification center contains a request for an on-site meeting, WTGH shall meet with the excavator within two working days after the day on which the notice was given. This meeting shall occur on a mutually agreed upon date and time between the excavator and WTGH.

Note: The deadline for locating WTGH facilities after an on-site meeting is as follows:

 Within two working days prior to the excavation start date agreed upon during the onsite meeting

In the event WTGH determines it is necessary to have the intended excavation area white lined, to accurately locate our pipelines and/or facilities, such request will be made to the excavator. WTGH shall document the following if a white-line request has been made:

- Name of the excavator contacted for white-lining
- Verification of both parties understanding of the description of the excavation site
- The agreed upon excavation start date
- Date and time of the white-lining request

Note: Within the State of Kansas the deadline to comply with the steps mentioned above is 2 working days beginning on the later of the following:

- The first working day after the excavator has filed the notice of intent to excavate
- The first day after the excavator has white lined the excavation site

4.6.2.1 Extraordinary Circumstances

The above deadlines do not apply if WTGH experiences an extraordinary circumstance due to an act of God, including a tornado, 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.



WTGH will notify the notification center(s), within the State of Kansas, 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;
- The expected duration of the situation and the approximate time at which WTGH 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 WTGH's immediate attention.

In addition to contacting the notification center, WTGH 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 WTGH is experiencing an extraordinary circumstance; and
- The approximate time at which the operator will mark the requested location.

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

- WTGH will mark all underground pipelines in accordance with the following:
 - 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 as long as visible, but not longer than 15 calendar days after the excavation start date.
 - In the event it is determined WTGH's markings have been altered or removed, WTGH will remark our pipelines and/or facilities within one working day

Note: If the line locate ticket has been refreshed (see Excavator Notice to Notification Center), WTGH will ensure the markings are still visible and valid or will remark.

 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.

WTGH will maintain a record of the positive response for each line locate ticket received.

4.6.3.1 Marking Requirements

- A qualified WTGH representative will use all information necessary to mark underground pipelines accurately. This will include available facility records, maps and a visual inspection of the excavation area to determine if there is evidence of other pipelines.
 - If during the locating process, the WTGH representative determines there information missing in these records, he will notify the WTG Compliance Department to have these corrections made.
- If in the process of marking underground pipelines, the locator discovers a customerowned or other underground pipeline(s), he will make a reasonable effort to advise the excavator of the pipeline.
- A qualified WTGH Representative will mark the approximate center line of an underground pipeline. The methods used include, but are not limited to, the following:
 - Line locating equipment
 - Pot Holing
 - Probing
- In the event a planned excavation activity shall occur within 25 feet of a WTGH pipeline and/or facility, WTGH shall have a representative available during any excavation activity.
 - This will be documented using the WTG Excavator / Operator Written Agreement Form
- 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 section of this procedure.
- A qualified WTGH Representative 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



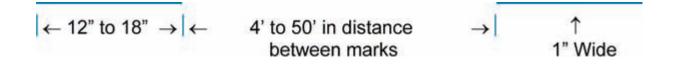
means for marking the pipeline. See Guidelines for Operator's Facility Field Delineation section of this procedure.

- If a WTGH facility is less than 8" in diameter, WTGH shall mark the centerline of the pipeline and/or facility
- If a WTGH facility is 8" or greater, WTGH shall mark the outside dimensions of the pipeline and/or facility
- A qualified WTGH Representative will mark the pipeline at sufficient intervals to indicate clearly the approximate horizontal location and direction of the underground pipeline.
- A qualified WTGH Representative 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.
- A qualified WTGH Representative will paint marks approximately eight to ten inches in length and one to two inches in width except when spot marking is necessary. The locator will make a minimum of three separate marks for each pipeline.

4.6.3.2 Guidelines for Operator's Facility Field Delineation

WTGH markings of facilities include; yellow markings (paint, flags, stakes, whiskers or a combination); 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).

Marks in the appropriate color are to be approximately 12" to 18" in length and 1" in width and separated by no more than 50' in distance as an example. When marking facilities WTGH will consider the type of facility being located, the terrain of the land, the type of excavation being done and the method to adequately mark its facilities for the excavator.

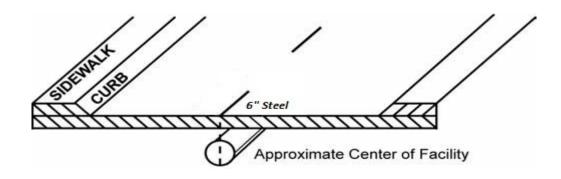




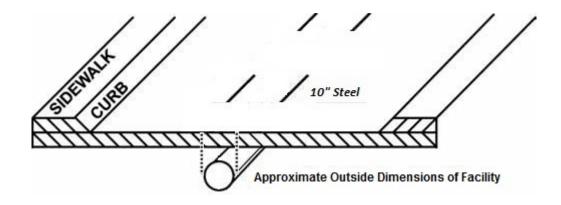
The following marking illustrations are examples of how WTGH may choose to mark their subsurface installations

Single Facility Marking: Used to mark a single facility, marks are placed over the
approximate center of the facility if the facility is less than 8" in diameter. Mark the outside
edge of the facility if it is 8" or greater in diameter. When a facility can be located or
toned separately from other facilities of the same type it is marked as a single facility.

Pipeline is less than 8"

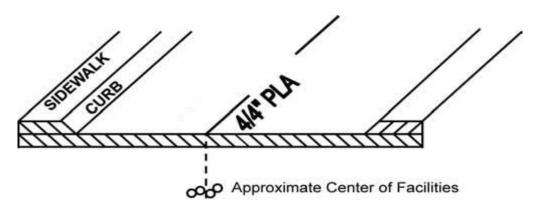


Pipeline is 8" or Greater

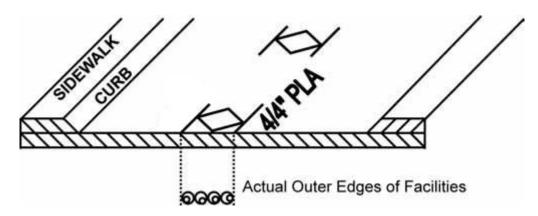




Multiple Facility Marking: Used to mark multiple facilities of the same type (e.g. electric), where the separation does not allow for a separate tone for each facility but the number and width of the facilities is known. Marks are placed over the approximate center of the facilities and indicate the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



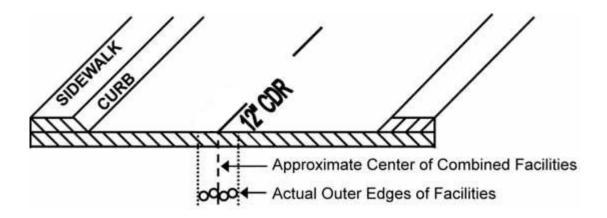
Conduit Marking: Used for any locatable facility being carried inside conduits or ducts.
The marks indicating the outer extremities denote the actual located edges of the facilities
being represented. An example would be 4 plastic conduits that are 4" in diameter (4/4"
PLA), and the marks are 16" apart indicating the actual left and right edges of the
facilities.



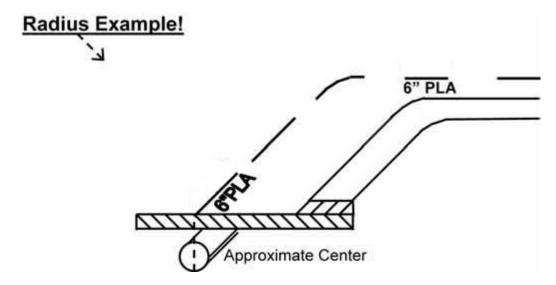
• Corridor Marking: Used to mark multiple facilities of the same type (e.g. electric), in the same trench where the total number of facilities is not readily known (operator has no



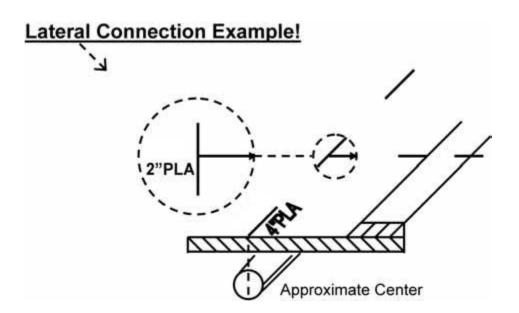
record on file for the number facilities) and that are bundled or intertwined. Marks are placed over the approximate center of the facilities and indicate the width of the corridor. The width of the corridor is the distance between the actual located outside edges of the combined facilities. This example indicates a 12" corridor (12" CDR).

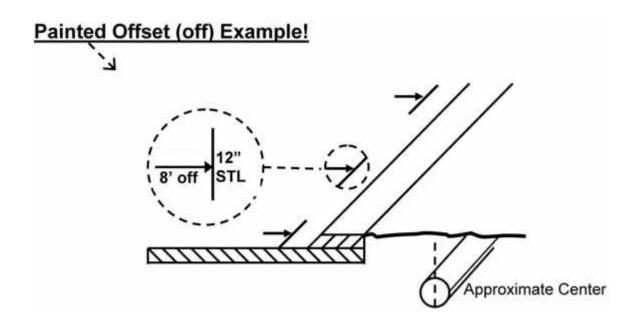


Changes in direction and lateral connections are to be clearly indicated at the point where the change in direction or connection occurs with an arrow indicating the path of the facility. A radius is indicated with marks describing the arc. When providing offset markings, (paint or stakes), show the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

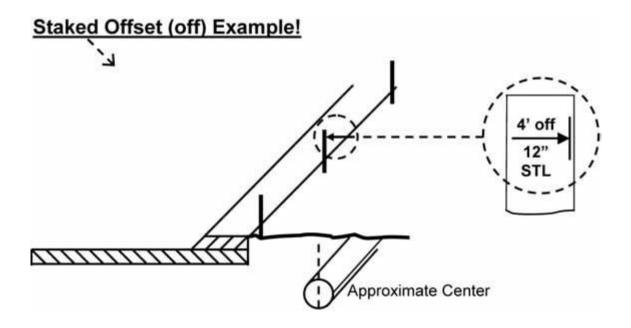










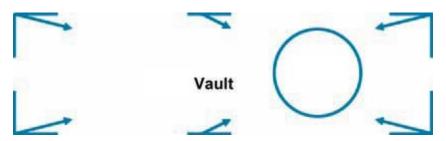


WTGH's identifier (name, abbreviation or initials) is to be placed at the beginning and at the end of the proposed work. In addition to the previous, subsequent operators using the same color will mark their company identifier at all points where their facility crosses another operator's facility using 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.

Information as to the size and composition of the facility is to be marked at an appropriate frequency. Examples are: the number of ducts in a multi-duct structure, width of a pipeline, and whether it is steel, plastic, cable, etc.

Facilities installed in a casing should be identified as such. Two examples are: 6" plastic in 12" steel = 6"PLA/12"STL and fiber optic in 4" steel = FO (4"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 WTGH'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 WTGH" in yellow).
- If it can be determined through maps or records that the proposed excavation is obviously not in conflict with WTGH's facilities, the locator or operator of the facility shall notify the excavator of "No Conflict" by phone, fax, or email, or through the One Call Center.
 - Two documented attempts by WTGH to reach an excavator by telephone during normal business hours shall constitute compliance with the above mentioned statement.

*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.



4.6.4 WTGH'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, WTGH 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 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 WTGH facilities and during critical times of potential contact of drilling or boring equipment with WTGH facilities.
- In the case of contractors performing drilling or boring operations for WTGH, qualified WTGH 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.
- Qualified WTGH personnel shall also ensure that any WTGH contractors make proper notifications to the appropriate One-Call notification system and/or others that may have underground facilities that could be affected by the operations, and that the notifications are documented.
- Qualified personnel shall ensure that a verification number is obtained from the One-Call provider for the notification.

4.6.6 WTGH's Obligation in the Event a Pipeline was Unmarked/Mismarked

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

4.6.7 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.
 - o If no damages occur within this time frame, photographs may then be discarded.



4.6.8 Reporting Requirements

Report all damages of WTGH's pipelines and/or facilities to the WTG Damage Prevention Coordinator, as soon as possible, ideally within 15 days of the damage.

4.7 Excavator Damage Prevention Requirements

4.7.1 Excavator Notice to Notification Center

- 1. Prior to the commencement of any excavation, WTGH will notify the notification center (811) of its intent to excavate.
 - This notice shall be given at least 2 working days, excluding weekends and holidays, but not more than 15 calendar days, in advance of the commencement of an excavation activity.
 - Holidays shall consist of the following: New Year's Day; Memorial Day; Independence Day; Labor Day; Thanksgiving Day; Day after Thanksgiving Day; and Christmas Day.
- 2. WTGH'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
 - Name of the Excavator
 - Name and telephone number for the individual who will be representing WTGH at the excavation site
 - Whether the excavation site is white-lined
 - Specific location, including street address, if available, closest street, road or intersection and size of the proposed excavation
 - o If the excavation site is in a rural area, or no street address is available, the description of the excavation site shall include one of the following:
 - 1. Driving directions form the closest street, road or intersection
 - 2. A specific legal description, including quarter section; or
 - The longitude and latitude coordinates
 - Statement as to whether directional boring or explosives are to be used
 - Identify any hazards that may exist or be present on the excavation site
 - Contact information for how WTGH will receive a response from the operator.
- 3. 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
- 4. If it is requested by the operator that WTGH white-line the intended excavation area, WTGH shall white-line the planned excavation area prior to the operator locating their pipelines and/or facilities.
- 5. Provide in the notice the method or methods by which WTGH will receive a positive response. This may include, but is not limited to:
 - Telephone,
 - Fax
 - Email
- 6. The notice of WTGH's intent to excavate shall only describe an area in which the proposed excavation can reasonably be completed within 15 calendar days.
- 7. WTGH shall wait at least 2 full working days, 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.
- 8. If an excavation project is not completed within the required 15 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 WTGH's Obligation with respect to On-Site Meetings

If WTGH requests an on-site meeting with the operator, WTGH shall not begin any excavation activity prior to the mutually agreed upon start date determined during the on-site meeting.

- WTGH shall document the on-site meeting and any subsequent meetings, and maintain these records for a period of at least 2 years. The documentation shall include the following:
 - Verification that the description of the excavation site is understood by both parties
 - The scheduled start date for the excavation that has been agreed upon
 - The date and time of the meeting
 - The name and company affiliation of each attendee at the meeting



4.7.3 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-toface meetings at prescribed times or intervals;
 - Provide the method for coordinating work activities among all entities working at an excavation site:
 - o 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 15 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 24 inches, but not more than 25 inches, on either side of the outside edge of the underground pipeline in all horizontal directions; 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 protocals are established, make and retain a record of the agreement.

4.7.4 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.
- WTGH 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:
 - o The operator determines the intended construction will not increase the risk to the



public or a risk to the pipeline facility;

- o The construction activity is conducted under a mutual agreement, or;
- o 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, WTGH shall wait the required time frames listed below:
 - No less than 2 full working days, which starts on the latter of the following;
 - The first working day after the excavator has filed the notice of intent to excavate
 - > The first day after the excavator has white lined the excavation site
 - An excavation start time agreed to, in writing, by the operator and the excavator.
- Prior to excavation, confirm that a copy of a valid locate ticket for the location is in the possession of WTGH's designated representative and can be obtained upon request.
- Prior to excavation, verify correct location as specified on the locate ticket; verify whitelining; and make a visual check for any unmarked underground pipelines. Checking for unmarked underground pipelines includes, but is not limited to the following:
 - o looking for additional pipeline line markers,
 - o aboveground pipeline valves,
 - o meter sets,
 - o regulator stations,
 - rectifier units.
- If there is no positive response, or WTGH feels there may be an unmarked pipeline in the vicinity of the planned excavation, WTGH will 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.
- 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, WTGH personnel shall provide temporary offset marks or stakes to retain the information regarding the location of each operator's underground facilities.



4.7.5 Excavation within Tolerance Zone

- WTGH will take all reasonable steps necessary to protect underground pipelines from damage. These steps include, but are not limited to the following:
 - Maintain a safe clearance between the underground utilities or facilities, and the cutting edge, or point, of any power or mechanized equipment. Take into account the known limit of control of the cutting edge, or point, to avoid damage to utilities or facilities.
 - ➤ Provide support for underground utilities or facilities in and near the construction area, during excavation and back filling operations, as may be reasonably necessary to protect the utility or facility.
 - ➤ Dig test pits to determine the actual location of utilities or facilities handling natural gas, or other flammable, toxic, or corrosive fluids if these utilities or facilities are to be exposed.
- Methods of excavation 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 approval of the underground pipeline operator. Hand digging and non-invasive methods are not required for pavement removal.

4.7.6 WTGH's Obligation with Respect to Pre-Engineered and Permitted Projects

If WTGH wishes to conduct an excavation as a permitted project, the permit obtained by WTGH shall have been issued by a federal, state, or municipal governmental entity and shall have been issued contingent on the excavator's having met the following requirements:

- Notified all operators with facilities in the vicinity of the excavation of the intent to excavate as a permitted project;
- Visually verified the presence of the facility markings at the excavation site; and
- Served notice of intent of excavation at least two full working days, but not more than 15 calendar days before the scheduled excavation start date, on each operator having underground facilities located in the proposed area of excavation.

WTGH shall not claim pre-engineered project status unless the public agency responsible for the project performed the following before allowing excavation:

- Identified all operators that have underground facilities located within the excavation site:
- Requested that the operators that have underground facilities located within the excavation site verify the location of their underground facilities, if any, within the excavation site;
- Required the location of all known underground facilities to be noted on updated engineering drawings as specifications for the project;



- Notified all operators that have underground facilities located within the excavation site of the project of any changes to the engineering drawings that could affect the safety of existing facilities; and
- Served notice of intent of excavation at least two full working days, but not more than 15 calendar days before the scheduled excavation start date, on each operator having underground facilities located in the proposed area of excavation.

4.7.7 Handling Damaged Facilities:

If an excavation operation results in damage to an underground facility, which includes contact or damage to tracer wire, locate balls, or associated surface equipment; WTGH shall do the following:

• WTGH shall, as soon as practical, contact the underground facility operator, if known, to report the damage; and

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

WTGH 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 WTGH and the operator.

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



4.8 Incident Information Card

<u>DIG_SAFELY</u>

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:	
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.





Appendix A Excavation Related Persons List

This Appendix is too large to fit into this document. It is referenced and displayed on the WTG website at www.westtexasgas.com.



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