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# 1 INTRODUCTION

## 1.1 PURPOSE

Federal pipeline safety regulations, pertaining to pipeline operator public awareness (PAP), can be found under §192.616, for transportation of natural gas or other gas by pipeline) and §195.440, for transportation of hazardous liquids by pipeline.

Pipeline operators (except for an operator of a master meter or petroleum gas system covered under §192.616(j)) must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162, "Public Awareness Programs for Pipeline Operators" (1st edition, incorporated by reference, see §192.7 or §195.3).

The Company's public awareness program provides safety information to stakeholders to help keep communities near pipelines safe. Utilizing API RP #1162 these procedures define how the company will accomplish these objectives.

The following four objectives provide the foundation for the company pipeline public awareness program.

### 1.1.1 Awareness of Pipelines:

The company's public awareness program shall raise stakeholder audience awareness of the presence of pipelines in their communities and of the significant role they can play in helping to prevent pipeline emergencies and releases, including accidents caused by third-party damage and right-of-way (ROW) encroachment. Public awareness programs also help stakeholder audiences understand that pipeline accidents are rare and that pipelines are a safe mode of transportation.

### 1.1.2 Prevention:

The company's public awareness program shall help stakeholder audiences understand how to prevent pipeline emergencies. Prevention helps reduce the occurrence of pipeline emergencies caused by third-party damage through awareness of safe excavation practices and the use of the One Call Center.

### 1.1.3 Response:

Public awareness programs shall help stakeholder audiences understand how to respond to a pipeline emergency. the company undertakes a variety of measures

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to prevent pipeline accidents and anticipate and plan for management of accidents if they occur.

#### 1.1.4 Program Enhancement

Provide for periodic program evaluation to enhance the program as circumstances warrant.

## 1.2 SCOPE

The scope of these written procedures covers the development, implementation, evaluation, and documentation of public awareness programs associated with the normal operation of existing pipeline systems and facilities.

The following pipeline systems and segments are covered by the company PA program:

- See MOP sheet for list of lines.

The company management of change process (MOC) will be used to update the public awareness procedures when any of the following occurs:

- Acquisition of new pipelines
- Divestures of pipelines
- Mergers with other pipeline companies
- Existing pipeline become jurisdictional

Communications related to new pipeline construction, offshore operations, and emergency protocols are not covered by these procedures, nor is it intended to provide guidance to operators for communications about operator-specific performance measures that are addressed through other means of communication or regulatory reporting.

Listed procedures provide the company with the elements of a baseline public awareness program based on general API program recommendations, up to and including considerations to determine when and how to enhance the program to provide the appropriate level of public awareness outreach. Enhancements may affect messages, delivery frequency and methods, geographic coverage areas, program evaluation, and other elements.

The company will follow API RP #1162 unless the company provides valid justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and / or not necessary for meeting safety guidelines.

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### 1.3 REFERENCES

#### 1.3.1 Industry Documents

- API Standard 1162, Public Awareness Programs for Pipeline Operators

#### 1.3.2 Regulatory Documents

- Title 49, CFR Part 195, "Transportation of Hazardous Liquids by Pipeline: Minimum Federal Regulations"

#### 1.3.3 Company Documents

- PPPM-OM-DP Damage Prevention
- PPPM-OM-PA Public Awareness
- PPPM-CCM Corrosion Control
- PPIM-IMP Integrity Management Plan
- PPIM-IMP-HT Liquid Pressure Testing Standard
- PPWP Welding Procedures
- PPPM-OSRP Oil Spill Response Plan

#### 1.3.4 Other Documents

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## 2 DEFINITIONS

**Table 1: Definitions**

Term	Description
8-1-1 (811)	National Call Before You Dig telephone number federally mandated to eliminate the need of having to remember a state "One Call Center" toll-free telephone number.
Baseline Public Awareness Program	Relevant components of an operator's public awareness program for delivery frequency, message content, and delivery methods as summarized in Annex A of this document.
Dig Safely	Nationally recognized damage prevention education and public awareness program to enhance safety, environmental protection, and service reliability by reducing underground facility damage.
Encroachment	Unauthorized advancement onto or within the operator's ROW.
Enhanced Public Awareness Program	Components of a public awareness program that exceed baseline program provisions. NOTE: Enhancements are also known as supplemental requirements under Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations (49 CFR Part 192.616 and 49 CFR Part 195.440).
Public Education	The terms "public education," as used in the pipeline safety regulations, and "public awareness," as used in API RP 1162, are considered synonymous and interchangeable for the purpose of pipeline operator PAP, as noted in the final rule [70 FR 28838] published on May 19, 2005.
Abandoned	permanently removed from service
Administrator	the Administrator, Pipeline and Hazardous Materials Safety Administration or his or her delegate
Alarm	an audible or visible means of indicating to the controller that equipment or processes are outside operator-defined, safety-related parameters
Barrel	a unit of measurement equal to 42 U.S. standard gallons
Breakout Tank	a tank used to (a) relieve surges in a hazardous liquid pipeline system or (b) receive and store hazardous liquid transported by a pipeline for reinjection and continued transportation by pipeline
Carbon Dioxide	a fluid consisting of more than 90 percent carbon dioxide molecules compressed to a supercritical state
Component	any part of a pipeline which may be subjected to pump pressure including, but not limited to, pipe, valves, elbows, tees, flanges, and closures
Computation Pipeline Monitoring	a software-based monitoring tool that alerts the pipeline dispatcher of a possible pipeline operating anomaly that may be indicative of a commodity release
Confirmed Discovery	when it can be reasonably determined, based on information available to the operator at the time a reportable event has occurred, even if only based on a preliminary evaluation
Control Room	an operations center staffed by personnel charged with the responsibility for remotely monitoring and controlling a pipeline facility
Controller	a qualified individual who remotely monitors and controls the safety-related operations

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**Table 1: Definitions**

Term	Description
	of a pipeline facility via a SCADA system from a control room, and who has operational authority and accountability for the remote operational functions of the pipeline facility
Corrosive Product	"corrosive material" as defined by § 173.136 Class 8-Definitions of this chapter.
Exposed Underwater Pipeline	an underwater pipeline where the top of the pipe protrudes above the underwater natural bottom (as determined by recognized and generally accepted practices) in waters less than 15 feet (4.6 meters) deep, as measured from mean low water
Flammable Product	"flammable liquid" as defined by § 173.120 Class 3-Definitions of this chapter
Gathering Line	a pipeline 219.1 mm (8 5/8 in) or less nominal outside diameter that transports petroleum from a production facility
Gulf of Mexico and its Inlets	the waters from the mean high-water mark of the coast of the Gulf of Mexico and its inlets open to the sea (excluding rivers, tidal marshes, lakes, and canals) seaward to include the territorial sea and Outer Continental Shelf to a depth of 15 feet (4.6 meters), as measured from the mean low water
Hazard to Navigation	for the purposes of this part, a pipeline where the top of the pipe is less than 12 inches (305 millimeters) below the underwater natural bottom (as determined by recognized and generally accepted practices) in waters less than 15 feet (4.6 meters) deep, as measured from the mean low water
Hazardous Liquid	petroleum, petroleum products, anhydrous ammonia, or ethanol
Highly Volatile Liquid or HVL	a hazardous liquid which will form a vapor cloud when released to the atmosphere and which has a vapor pressure exceeding 276 kPa (40 psia) at 37.8 °C (100 °F)
In-Line Inspection (ILI)	the inspection of a pipeline from the interior of the pipe using an in-line inspection tool. Also called intelligent or smart pigging
In-Line Inspection Tool or Instrumented Internal Inspection Device	a device or vehicle that uses a non-destructive testing technique to inspect the pipeline from the inside. Also known as intelligent or smart pig.
In-plant piping system	piping that is located on the grounds of a plant and used to transfer hazardous liquid or carbon dioxide between plant facilities or between plant facilities and a pipeline or other mode of transportation, not including any device and associated piping that are necessary to control pressure in the pipeline under § 195.406(b).
Interstate pipeline	a pipeline or that part of a pipeline that is used in the transportation of hazardous liquids or carbon dioxide in interstate or foreign commerce
Intrastate pipeline	a pipeline or that part of a pipeline to which this part applies that is not an interstate pipeline.
Line section	a continuous run of pipe between adjacent pressure pump stations, between a pressure pump station and terminal or breakout tanks, between a pressure pump station and a block valve, or between adjacent block valves.
Low-stress pipeline	a hazardous liquid pipeline that is operated in its entirety at a stress level of 20 percent or less of the specified minimum yield strength of the line pipe
Maximum operating pressure (MOP)	the maximum pressure at which a pipeline or segment of a pipeline may be normally operated under this part
Nominal wall thickness	the wall thickness listed in the pipe specifications.

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**Table 1: Definitions**

<b>Term</b>	<b>Description</b>
Offshore	beyond the line of ordinary low water along that portion of the coast of the United States that is in direct contact with the open seas and beyond the line marking the seaward limit of inland waters
Operator	a person who owns or operates pipeline facilities
Outer Continental Shelf	all submerged lands lying seaward and outside the area of lands beneath navigable waters as defined in Section 2 of the Submerged Lands Act (43 U.S.C. 1301) and of which the subsoil and seabed appertain to the United States and are subject to its jurisdiction and control
Person	any individual, firm, joint venture, partnership, corporation, association, State, municipality, cooperative association, or joint stock association, and includes any trustee, receiver, assignee, or personal representative thereof
Petroleum	crude oil, condensate, natural gasoline, natural gas liquids, and liquefied petroleum gas
Petroleum product	flammable, toxic, or corrosive products obtained from distilling and processing of crude oil, unfinished oils, natural gas liquids, blend stocks and other miscellaneous hydrocarbon compounds
Pipe or line pipe	a tube, usually cylindrical, through which a hazardous liquid or carbon dioxide flows from one point to another
Pipeline or pipeline system	all parts of a pipeline facility through which a hazardous liquid or carbon dioxide moves in transportation, including, but not limited to, line pipe, valves, and other appurtenances connected to line pipe, pumping units, fabricated assemblies associated with pumping units, metering and delivery stations and fabricated assemblies therein, and breakout tanks
Pipeline facility	new and existing pipe, rights-of-way and any equipment, facility, or building used in the transportation of hazardous liquids or carbon dioxide
Production facility	pipng or equipment used in the production, extraction, recovery, lifting, stabilization, separation or treating of petroleum or carbon dioxide, or associated storage or measurement. (To be a production facility under this definition, piping or equipment must be used in the process of extracting petroleum or carbon dioxide from the ground or from facilities where CO <sub>2</sub> is produced and preparing it for transportation by pipeline. This includes piping between treatment plants which extract carbon dioxide, and facilities utilized for the injection of carbon dioxide for recovery operations)
Rural area	outside the limits of any incorporated or unincorporated city, town, village, or any other designated residential or commercial area such as a subdivision, a business or shopping center, or community development
Significant Stress Corrosion Cracking	a stress corrosion cracking (SCC) cluster in which the deepest crack, in a series of interacting cracks, is greater than 10% of the wall thickness and the total interacting length of the cracks is equal to or greater than 75% of the critical length of a 50% through-wall flaw that would fail at a stress level of 110% of SMYS
Specified minimum yield strength	the minimum yield strength, expressed in p.s.i. (kPa) gage, prescribed by the specification under which the material is purchased from the manufacturer
Stress level	the level of tangential or hoop stress, usually expressed as a percentage of specified minimum yield strength

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**Table 1: Definitions**

Term	Description
Supervisory Control and Data Acquisition (SCADA) system	a computer-based system or systems used by a controller in a control room that collects and displays information about a pipeline facility and may have the ability to send commands back to the pipeline facility
Surge pressure	pressure produced by a change in velocity of the moving stream that results from shutting down a pump station or pumping unit, closure of a valve, or any other blockage of the moving stream
Toxic product	"poisonous material" as defined by § 173.132 Class 6, Division 6.1-Definitions of this chapter
Unusually Sensitive Area (USA)	a drinking water or ecological resource area that is unusually sensitive to environmental damage from a hazardous liquid pipeline release, as identified under § 195.6
Welder	a person who performs manual or semi-automatic welding
Welding operator	a person who operates machine or automatic welding equipment

### 3 PUBLIC AWARENESS PROGRAM ACTIVITIES

When establishing the company public awareness program, the following five activities were completed:

- a. Define objectives (what the public awareness program should accomplish),
- b. Obtain management commitment (management to recognize and support the public awareness program),
- c. Establish program administration (administrative framework for the program and assigning personnel),
- d. Identify pipeline assets (which assets should be covered by the public awareness program),
- e. Identify stakeholder audiences (which people should be targeted to receive public awareness messages),

### 4 MANAGEMENT COMMITMENT AND PUBLIC AWARENESS PROGRAM AUTHORITIES

For the company public awareness program to achieve stated objectives, ongoing support from company management is crucial. The company public awareness Team Charter defines general team member roles and responsibilities.

The required documentation section at the end of this procedure defines who is responsible for completing specific tasks including documentation. The company Team Charter will be reviewed by the appropriate level of management. It will be understood and described on

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the team charter that when a person is assigned a public awareness task, the person also has the authority to complete that tasks.

## 5 STAKEHOLDER AUDIENCES

The following four categories of stakeholder audiences have been identified and shall receive the program messages.

- a. Affected public
- b. Emergency officials
- c. Public officials
- d. Excavators

The company may hire outside consultants to assist them in identifying stakeholder audiences. The Company shall keep a record of how the stakeholder audience lists were compiled and what system was employed, such as the Standard Industrial Classification (SIC) and/or the North American Industry Classification System (NAICS). Operators should develop a process to validate the accuracy of mailing information obtained internally, from the postal service or outside consultants. Table 5-1 through Table 5-4 below identifies the Company stakeholders identified by these procedures.

### 5.1 AFFECTED PUBLIC

For the purposes of this document, the affected public is residents and/or businesses located near or adjacent to transmission or gathering pipelines. For a more detailed example of these audiences, please see Table 6-1 below.

The Company shall determine specific affected public addresses near the pipeline within a specified minimum coverage area. Examples of how may identify affected public addresses are through a nine-digit zip code address database or geo-spatial address databases. These databases generally provide only the addresses and not the names of the persons residing there. Individual apartment unit addresses shall be used, not just the address of the apartment building or complex.

The following is currently used for affected public address generation for the Company

PA program:

- Use of Paradigm as third party consultant
- Paradigm method for address generation uses GeoCoding and SIC codes (see Paradigm documentation for details)

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For stakeholder audiences identified in Table 5-1, including “Residents located adjacent to the transmission pipeline ROW” and “Places of congregation,” transmission pipeline The Company stipulates the minimum coverage in their program as shown below. The Company may choose to define the minimum coverage area in a variety of ways. For example, the Company may determine the minimum coverage area by using a distance of 660 feet from the centerline of the ROW; or 660 feet from the centerline of the pipeline; or determine the area using a potential impact radius (PIR) calculation.

The following is currently used for affected public minimum coverage distance for the Company PA program.

**Table 5-1: Stakeholder Audiences – Affected Public**

<b>Stakeholder Audience</b>	<b>Stakeholder Definition</b>	<b>Examples</b>
Residents located adjacent to the transmission pipeline ROW	People who live or work adjacent to a natural gas and/or hazardous liquid transmission pipeline ROW	<ul style="list-style-type: none"> <li>• Occupants or Residents</li> <li>• Tenants</li> <li>• Farmers</li> <li>• Homeowners associations or groups</li> <li>• Neighborhood organizations</li> </ul>
Residents located along local distribution systems	People who live or work on or immediately adjacent to the land where gas distribution pipelines are buried	<ul style="list-style-type: none"> <li>• Local distribution company (LDC) customers</li> <li>• Non-customers living immediately adjacent to the land where distribution pipelines are located</li> <li>• Homeowners associations or groups</li> <li>• Neighborhood organizations</li> </ul>
Gas transmission pipeline customers	Businesses or facilities that the pipeline operator provides gas directly to for end use purposes. This does not include	<ul style="list-style-type: none"> <li>• Power plants</li> <li>• Businesses</li> <li>• Industrial facilities</li> </ul>
Residents near liquid or natural gas storage and other major operational facilities along transmission lines	People who live or work adjacent to or near a major facility such as tank farm, storage field, and	<ul style="list-style-type: none"> <li>• Residents</li> <li>• Farmers</li> <li>• Homeowners associations or groups</li> <li>• Neighborhood organizations</li> </ul>

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Residents located along gathering lines	<p>People who live or work along gathering lines</p> <p>For higher consequence gathering lines (e.g. H2S), people who live or work a distance on either side of right-of-way that is based on the potential impact in</p>	<ul style="list-style-type: none"> <li>• Occupants or Residents</li> <li>• Tenants</li> <li>• Farmers</li> <li>• Homeowners associations or groups</li> <li>• Neighborhood organizations</li> </ul>
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## 5.2 EMERGENCY OFFICIALS

The Company has identified the appropriate emergency officials whose jurisdictions are traversed by the pipeline. For a more detailed example of these audiences, please see Table 5-2 below.

The Company shall determine specific emergency officials near the pipeline within a specified minimum coverage area. Examples of how the Company may identify affected public addresses are through a nine-digit zip code address database or geo-spatial address databases. These databases generally provide only the addresses and not the names of the officials residing there.

The following is currently used for emergency officials address generation for the Company PA program:

- Use of Pardigm as third party consultant
- Pardigm method for address generation uses SIC codes and a buffer of 20 miles total, 10 mile either side of company's assets

**Table 5-2: Stakeholder Audiences – Emergency Officials**

Stakeholder Audience	Stakeholder Definition	Examples
Emergency officials	Local, city, county, state, or regional officials, agencies and organizations with emergency response and/or public safety jurisdiction in the area of the pipeline	<ul style="list-style-type: none"> <li>• Fire departments</li> <li>• Police/sheriff departments</li> <li>• Local Emergency Planning Committees (LEPCs)</li> <li>• County and state emergency management agencies</li> <li>• 911 centers and/or emergency dispatch</li> </ul>

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### 5.3 PUBLIC OFFICIALS

The Company has identified the appropriate public officials whose jurisdictions are traversed by the pipeline. For a more detailed example of these audiences, please see Table 5-3 below.

The Company shall determine specific public officials near the pipeline within a specified minimum coverage area. Examples of how the Company may identify affected public addresses are through a nine-digit zip code address database or geo-spatial address databases. These databases generally provide only the addresses and not the names of the officials residing there.

The following is currently used for public officials address generation for the Company PA program:

- Use of Pardigm as third party consultant
- Pardigm method for address generation uses SIC codes and a buffer of 20 miles total, 10 mile either side of company's assets

**Table 5-3: Stakeholder Audiences – Public Officials**

Stakeholder Audience	Stakeholder Definition	Examples
Public officials	Local, city, county, state, regional, federal officials, agencies and/or their staff having land use and street/road jurisdiction in the area of the pipeline	<ul style="list-style-type: none"> <li>• Planning boards</li> <li>• Zoning boards</li> <li>• Licensing departments</li> <li>• Permitting departments</li> <li>• Building code enforcement departments</li> <li>• City and county managers</li> <li>• Public and government officials</li> <li>• Public utility boards</li> <li>• Local governing councils</li> <li>• Public officials who manage franchise or license agreements</li> <li>• Military installations</li> </ul>

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## 5.4 EXCAVATORS

The Company shall identify persons or companies who normally engage in excavation activities in areas which the pipeline is located. Examples of individuals or companies that would be considered excavators are given in Table 6-4 below.

The Company shall determine specific excavators near the pipeline within a specified minimum coverage area. Examples of how the Company may identify affected public addresses are through a nine-digit zip code address database or geo-spatial address databases. These databases generally provide only the addresses and not the names of the officials residing there.

The following is currently used for excavators address generation for the Company PA program:

- Use of Pardigm as third party consultant
- Pardigm method for address generation uses SIC codes and a buffer of 20 miles total, 10 mile either side of company's assets
- One calls are for the entire state

**Table 5-3: Stakeholder Audiences – Public Officials**

Stakeholder Audience	Stakeholder Definition	Examples
Excavators	Companies and local/state government agencies who are normally engaged in excavation activities and/or land development and planning	<ul style="list-style-type: none"> <li>• Construction companies</li> <li>• Excavation equipment rental companies</li> <li>• Public works officials</li> <li>• Public street, road, and highway departments (maintenance and construction)</li> <li>• Timber companies</li> <li>• Fence building companies</li> <li>• Drain tiling companies</li> <li>• Landscapers</li> <li>• Well drillers</li> <li>• Land developers</li> <li>• Home builders</li> <li>• One Call Centers</li> </ul>

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## 6 MESSAGE CONTENT FOR KEY STAKEHOLDERS

The information communicated to the stakeholder audiences plays a vital role in damage prevention. Messages are information that the Company provides to stakeholder audiences to improve awareness of pipelines. Messages shall be focused, concise, and clear. Such messages are intended to keep communities safe and prevent damage to pipelines. According to federal regulations, the program shall be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the area of the Company pipeline area. The process used to determine the need for additional languages is shown below.

- For the affected public and emergency responders, the Company will use the 2013 US Census Bureau data of their website (<http://quickfacts.census.gov/qfd/states>) that shows languages spoken by state and county.
- Based on this US Census Bureau data, the current languages spoken the Company affected public is English and Spanish.
- The Company will conduct a new survey of languages spoken in 2020, after updated US Census Bureau data is provided.
- If US Census Bureau is discontinued, then a new process will be developed for determining languages spoken.

### 6.1 ADDITIONAL LANGUAGES

Each operator is required to implement its program in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in its areas. Each operator should be able to provide the basis for their decisions with respect to this question.

Communications experts agree that people cannot absorb large amounts of information at one time. Therefore, the message content has been divided (by stakeholder audience) into two main categories:

- Baseline
- Enhanced messages

Baseline messages are core safety messages and vary depending on stakeholder audience and type of pipeline. The Company will provide baseline messages to each stakeholder audience. The Company will have the flexibility to determine when and if enhanced messages are necessary (see Section 9).

These procedures provide a general description of the messages. The Company will develop the wording for each message based on this guidance and what is

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appropriate for their pipeline assets. The Company contact information should be provided to all stakeholders in the baseline public awareness program. Specific messages are contained in the mailer documentation.

## 6.2 GENERIC MESSAGES

While collaboration is acceptable and encouraged, the operator’s use of generic messages that are not specific to a particular pipeline system, stakeholder audience, and/or product information is likely to be unacceptable in most cases. If generic messages are used, operators are still required to ensure the baseline messages are communicated to each stakeholder audience group.

There may be limited cases when the use of generic messages is acceptable. If an operator uses generic messages, then the operator is required to demonstrate that their message content and distribution for each stakeholder audience meets the PAP requirements and is specifically appropriate to the unique attributes and characteristics of each pipeline system for which the message is used and appropriate to the specific stakeholder audiences to which the message is targeted.

**Table 6-1: 3<sup>rd</sup> Party Companies Used for Specific Messages to Stakeholders**

	<b>Affected Public</b>	<b>Emergency Officials</b>	<b>Public Officials</b>	<b>Excavators</b>
<b>3<sup>rd</sup> Party Service Used for Specific Message to Each of the Stake Holders Listed to the Right:</b>	Paradigm	Paradigm	Paradigm	Paradigm

Table 6-2 sets forth baseline message topics that shall be used for each stakeholder audience and type of pipeline. It shall be noted that a particular baseline message may apply to one category of pipelines or stakeholder audience (e.g. only operators of transmission pipelines are required to send the National Pipeline Mapping System (NPMS) baseline message to emergency officials and public officials. Operators of other categories of pipelines are not required to send this specific baseline message). At the Company’s discretion, some or all of these messages may also be reiterated in an enhanced program.

**Table 6-2A: Baseline Messages for Transmission Pipelines**

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Message	Affected Public	Emergency Officials	Public Officials	Excavators
Pipeline purpose and reliability	Yes	Yes	Yes	Yes
Awareness of hazards and prevention measures	Yes	Yes	Yes	Yes
Damage prevention	Yes			Yes
One Call requirements	Yes		Yes	Yes
Leak/damage recognition and	Yes			Yes
Pipeline location Info	Yes			
How to get additional info	Yes	Yes	Yes	Yes
Availability of list of pipeline operators through NPMS	Yes	Yes	Yes	
Emergency preparedness communication		Yes	Yes	
Potential hazards		Yes		

**Table 6-2B: Baseline Messages for Gathering Pipelines**

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Message	Affected Public	Emergency Officials	Public Officials	Excavators
Gathering pipeline location and purpose	Yes	Yes	Yes	Yes
Awareness of hazards and prevention measures	Yes	Yes	Yes	Yes
Prevention Measures Undertaken	Yes	Yes	Yes	Yes
Damage prevention awareness	Yes			Yes
One Call requirements	Yes			Yes
Leak/damage recognition and response	Yes			Yes
How to get additional info	Yes	Yes	Yes	Yes
Emergency preparedness communication, company contact and response info		Yes		
Specific description of product transported and any potential special hazards		Yes		
Copies of materials provided to affected public and emergency officials			Yes	
Company contacts			Yes	

The tables below summarize the baseline and potential enhanced messages, delivery methods, and delivery frequencies for conducting public awareness programs for the Company gas transmission pipelines. The tables are not meant to include every possible enhanced program element. The Company may choose to communicate more frequently using additional messages and methods.

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**Table 6-3: Natural Gas or Liquid Pipeline Potential Enhanced Messages**

Affected Public	
<p><b>Baseline Program</b></p> <p><i>Frequency</i></p> <ul style="list-style-type: none"> <li>— 2 years</li> </ul> <p><i>Messages</i></p> <ul style="list-style-type: none"> <li>— Damage prevention</li> <li>— Leak/damage recognition and response</li> <li>— One Call requirements</li> <li>— Pipeline location information</li> <li>— Potential hazards</li> <li>— ROW encroachment</li> </ul> <p><i>Methods</i>—Determined by operator based on specifics of pipeline segment or environment. See Section 7 for available options.</p> <p>General categories include:</p> <ul style="list-style-type: none"> <li>— Electronic communication</li> <li>— Mass media</li> </ul>	<p><b>Enhanced Program</b></p> <p><i>Frequency</i></p> <ul style="list-style-type: none"> <li>— As determined by the operator</li> </ul> <p>For sour gas or sour crude pipelines the Company will consider annual contact to the affected public to provide special emergency procedures.</p> <p>For HVL's pipelines consider extending the public outreach program to residents who reside at lower elevations and within 1 mile of pipeline. ALN-91-04 (NTSB P-91-3)</p> <p><i>Messages</i></p> <ul style="list-style-type: none"> <li>— How to get additional information</li> <li>— Integrity management overview</li> <li>— NPMS</li> <li>— Pipeline purpose and reliability</li> </ul>
<ul style="list-style-type: none"> <li>— Personal contact</li> <li>— Targeted distribution of print materials</li> </ul>	<ul style="list-style-type: none"> <li>— Prevention measures</li> <li>— ROW encroachment (gathering line)</li> <li>— Special incident response notification and/or evacuation measures if appropriate to product of facility</li> <li>— Any planned major maintenance/ construction activity. <i>Methods</i>—Determined by operator based on specifics of pipeline segment or environment. See Section 7 for available options.</li> <li>General categories include:</li> <li>— Electronic communication</li> <li>— Mass media</li> <li>— Personal contact</li> <li>— Targeted distribution of print materials</li> </ul> <ul style="list-style-type: none"> <li>— Group meetings/ open houses.</li> </ul>

**Table 6-4: Natural Gas or Liquid Pipeline Potential Enhanced Messages**

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**Emergency Officials**

<b>Emergency Officials</b>	
<p><b>Baseline Program</b></p> <p><i>Frequency</i> --- 1 year</p> <p><i>Messages</i> --- Emergency preparedness communications --- Leak/damage recognition and response --- NPMS --- Pipeline location information --- Potential hazards --- Special emergency procedures for sour gas</p> <p><i>Methods</i> --- Determined by operator based on specifics of pipeline segment or environment. See Section 7 for available options.</p> <p>General categories include: --- Electronic communications --- Personal contact --- Targeted distribution of print material --- Group meetings</p>	<p><b>Enhanced Program</b></p> <p><i>Frequency</i> — As determined by operator</p> <p><i>Messages</i> — How to get additional information — Integrity management overview — Pipeline purpose and reliability — Prevention measures — Maintenance construction activity</p> <p><i>Methods</i> --- Determined by operator based on specifics of pipeline segment or environment. See Section 7 for available options.</p> <p>General categories include: --- Electronic communications --- Personal contact --- Targeted distribution of print material --- Group meetings --- Emergency tabletops, deployment exercises</p>

**Table 6-5: Natural Gas or Liquid Pipeline Potential Enhanced Messages**

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Public Officials	
<p><b>Baseline Program</b></p> <p><i>Frequency</i></p> <ul style="list-style-type: none"> <li>--- 3 year</li> </ul> <p><i>Messages</i></p> <ul style="list-style-type: none"> <li>--- Damage prevention</li> <li>--- Leak/damage recognition and response</li> <li>--- NPMS</li> <li>--- Pipeline location information</li> <li>--- Potential hazards</li> <li>--- One Call</li> </ul> <p><i>Methods</i></p> <p>--- Determined by operator based on specifics of pipeline segment or environment. See Section 7 for available options.</p> <p>General categories include:</p> <ul style="list-style-type: none"> <li>--- Electronic communications</li> <li>--- Personal contact</li> <li>--- Targeted distribution of print material</li> </ul>	<p><b>Enhanced Program</b></p> <p><i>Frequency</i></p> <ul style="list-style-type: none"> <li>— As determined by operator</li> </ul> <p><i>Messages</i></p> <ul style="list-style-type: none"> <li>— Emergency preparedness</li> <li>--- How to get additional information</li> <li>— Pipeline purpose and reliability</li> <li>— Right of Way Encroachment</li> <li>--- Prevention measures</li> <li>— Special emergency procedures</li> <li>--- If applicable information on HCAs and IMP</li> </ul> <p><i>Methods</i></p> <p>--- Determined by operator based on specifics of pipeline segment or environment. See Section 7 for available options.</p> <p>General categories include:</p> <ul style="list-style-type: none"> <li>--- Electronic communications</li> <li>--- Mass media</li> <li>--- Personal contact</li> <li>--- Targeted distribution of print material</li> </ul>

**Table 6-6: Natural Gas or Liquid Pipeline Potential Enhanced Messages**

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### Excavators

Baseline Program	Enhanced Program
<p><i>Frequency</i> --- 1 year</p> <p><i>Messages</i> --- Damage prevention --- Leak/damage recognition and response --- Pipeline location information --- Potential hazards --- One Call</p> <p><i>Methods</i> --- Determined by operator based on specifics of pipeline segment or environment. See Section 7 for available options.</p> <p>General categories include: --- Electronic communications --- Mass media --- Personal contact --- Targeted distribution of print material</p>	<p><i>Frequency</i> — As determined by operator</p> <p><i>Messages</i> --- How to get additional information — Pipeline purpose and reliability — Right of Way Encroachment --- Prevention measures</p> <p><i>Methods</i> --- Determined by operator based on specifics of pipeline segment or environment. See Section 7 for available options.</p> <p>General categories include: --- Electronic communications --- Mass media --- Personal contact --- Targeted distribution of print material</p>

### 6.3 DAMAGE PREVENTION

The Company will convey to audiences the importance of damage prevention, noting that even relatively minor excavation activities (e.g. installing mail boxes, privacy fences and flag poles, performing landscaping, constructing storage buildings, etc.) may cause damage to a pipeline or its protective coating or to other buried utilities. The Company will keep the damage prevention message content consistent with the following “Dig Safely” messages:

- Call 811 or the One Call Center before digging,
- Wait for the site to be marked,
- Respect the marks,
- Dig with care.
- The Company will also use of the 811 logo or the “No Dig” symbol in their materials.

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#### 6.4 SUSPICIOUS ACTIVITY

Messages shall be structured to raise stakeholder awareness of the need to look for and report any suspicious activities or suspected pipeline damage. Encourage stakeholders to report any suspicious activities on or near the pipeline system by individuals who are not performing obvious pipeline operation activities. Reporting suspicious activities is a proactive way to prevent damage to the pipeline system.

#### 6.5 SUSPECTED DAMAGE

Encourage stakeholders to report any damage to the pipeline system or any observed conditions that could threaten the integrity of the pipeline system. Some examples are exposed pipe, subsidence, sink holes, dead vegetation, or unstable soil. This message addresses the important role a stakeholder audience plays in preventing third-party damage and ROW encroachments.

#### 6.6 EMERGENCY PREPAREDNESS

These messages demonstrate that the Company has an ongoing relationship with emergency response officials, including 911 emergency call and dispatch centers and a program designed to prepare for and respond to an emergency.

#### 6.7 PRIORITY TO PROTECT LIFE

The Company's emergency response plans and key messages relayed to emergency officials shall emphasize that public safety and environmental and property protection are the top priorities in any pipeline emergency response.

#### 6.8 EMERGENCY CONTACTS

The Company's contact information shall be communicated to local and state emergency officials. If practicable, the Company shall also use the public awareness contact opportunity to confirm the contact information for the local and state emergency officials and calling priorities within each organization.

#### 6.9 LIASION WITH EMERGENCY OFFICIALS

Information communicated to emergency responders will be detailed, provide an opportunity for two-way feedback, and include additional details on the products transported, facilities located within the jurisdiction and the local emergency planning liaison.

The purpose of the emergency official's liaison meetings is to build the relationship between the Company and the responders and help to understand the expectations of the responders. The preferred method for conducting liaison meetings is face to face with specific emergency officials or group meeting

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conducted by Paradigm. During these meetings the Company will provide and verify the following:

- Summary copy of the Company pipeline emergency response plan including maps, product transported, and emergency contact information.
- Verify the response agency has the proper equipment and resources to respond to a Company pipeline emergency.

For emergency officials that were invited and don't attend group meetings, a summary copy of the Company pipeline emergency response plan including maps, product transported, and emergency contact info will be mailed.

### 6.10 EMERGENCY RESPONSE PLAN

The Company will communicate emergency response plans to local emergency responders in order to increase awareness of pipelines and response to emergencies. The plan provided to the emergency responders will be a summary version of the full plan and will include the following:

- Pipeline description and location including maps
- MSDS or hazard info about product transported
- Company emergency contact info
- Defining which types of emergencies that the Company will contact agencies
- How the Company will interact with the emergency responder

### 6.11 EMERGENCY DRILLS AND EXERCISES

Drills and exercises offer many additional opportunities for communicating messages and information. When participating with emergency response officials in drills and deployment exercises, the Company will communicate material to them on unified incident command system roles, operating procedures, and preparedness for various emergency scenarios.

### 6.12 INTEGRITY MANAGEMENT PROGRAMS (IMPs)

Materials may provide an overview of the Company's IMP and identify how more information on IMP may be obtained. An overview of the Company's IMP shall include a general description of the basic requirements and components of the program. This does not need to include a summary of the specific locations or schedule of activities undertaken. The overview may be mailed upon request or made available on the Company's website.

### 6.13 HOW TO GET ADDITIONAL INFORMATION

The Company will consider informing stakeholder audiences about how to get additional pipeline-related information from various sources; including the

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Company, trade association and government agencies. the Company specific information may include encroachment / landscape / property guidelines, crossing requirements, and local contacts.

#### 6.14 LEAK OR DAMAGE RECOGNITION AND RESPON

Messages about recognizing and responding to leaks and damage to pipelines are important. As appropriate to the product type, messages about recognizing a suspected pipeline leak, release, or observed damage shall relate to the senses of:

- Sight,
- Sound,
- Smell.

Messages about responding to a suspected pipeline leak or release shall include the following:

- a. What to do if a leak is suspected;
- b. What not to do if a leak is suspected;
- c. How to contact the Company and fire, police, or other appropriate public officials in an emergency. It is important to include specific information on detection and response if the pipeline contains product that, when released, could be immediately hazardous to health (e.g. high concentration of H<sub>2</sub>S). Information provided to excavators includes the need to communicate when damage to a pipeline from excavation activities occurs.

Excavators shall be directed to call 911 and the Company when a leak or damage occurs. For other situations, stakeholder audiences shall be directed to call the Company.

#### 6.15 NATIONAL PIPELINE MAPPING SYSTEM (NPMS)

Members of the general public may obtain pipeline location and/or mapping information by accessing the NPMS on the Internet. NPMS includes a list of pipeline operators and contact information for operators with pipelines in a specific area along with mapping information. Inquiries may be made by zip code or by county and state. Pipeline location maps are made available electronically to state and local emergency officials, in accordance with federal security measures. Distribution and gathering lines are not included in NPMS.

#### 6.16 ONE CALL REQUIREMENTS

The Federal Communications Commission (FCC) has designated 811 as the national One Call, toll-free number. In addition, One Call Center telephone

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numbers for all 50 states can be found on the 811 and Dig Safely websites. The Dig Safely website is shown below:

[www.call811.com](http://www.call811.com)

The stakeholder audience shall be reminded to call 811 or the state One Call Center before beginning any excavation activity and advised that in most states it is required by law. If the state or locality has established penalties for failure to use established damage prevention procedures, that information may also be communicated, depending on the audience and situation. Excavation and One Call information shall include the following:

- When to contact 811 or the One Call Center before digging,
- What happens when 811 or the One Call Center is notified,
- The 811 or toll-free One Call Center telephone numbers,

## 6.17 PIPELINE LOCATION INFORMATION

Following are various methods that can be used to provide pipeline location information.

6.17.1 Pipeline Markers: Pipeline markers are a valuable tool for educating the public regarding the general location of pipelines. The information shall include how to identify transmission pipeline ROWs by recognition of pipeline markers, especially at road crossings, fence lines and street intersections.

6.17.2 Pipeline Mapping: Pipeline maps provide useful information to stakeholder audiences. The level of detail in the map depends on the stakeholder's requirements, taking security of the energy infrastructure into consideration.

- System Maps—System maps provide general depiction of a pipeline shown on a state, regional, or national scale. This type of map generally is not at a scale that poses security concerns and is often used by operators in a number of publications available to the industry and general public. These maps provide a high-level overview of the pipeline route and location of facilities
- Local Maps—Local maps are generally shown on a neighborhood, town, city, or county level and usually do not show the entire pipeline system. Local maps are especially appropriate in communication with local emergency officials, One Call Centers, and public officials when discussing land use planning.
- NPMS—Information including maps of communities that depict all of the natural gas and liquid transmission pipeline systems in the area is available from PHMSA.

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## 6.18 PIPELINE PURPOSE AND RELIABILITY

The Company will consider providing general information about pipeline transportation, such as the following:

- The role, purpose, and function of pipelines and/or associated facilities in U.S. energy supply;
- Pipelines as part of the energy infrastructure;
- Efficiency and reliability of pipelines;
- The industry's safety record;
- The Company's pipeline safety actions and environmental record;
- The benefits of the pipeline to the community;
- State and federal regulations with regard to pipeline design, construction, operation, and maintenance;
- Operational activities that promote pipeline integrity, safety, and reliability (testing practices, inspections, patrolling, etc.).

Communication with the affected public, emergency, and public officials in proximity to major facilities (such as storage facilities, compressor or pump stations) should include information on the purpose of the facility and the categories of products stored or transported through it.

## 6.19 POTENTIAL HAZARDS

The Company should provide a broad overview of potential hazards. General information about pipeline hazards may be communicated, while also assuring the stakeholder audience that accidents are relatively rare. Information about the general product release characteristics and potential hazards that could result from an accidental release of hazardous liquids or gases from the pipeline or distribution system shall be included in the message. The Company may reference how stakeholders may obtain more information regarding products transported.

## 6.20 PREVENTION MEASURES

The Company will provide a broad overview of the measures undertaken to prevent or mitigate pipeline incidents. This message shall also reinforce how the stakeholder audience can play an important role in preventing third-party damage and ROW encroachments.

The message includes a general overview of the preventive measures undertaken by the Company in the planning, design, operation, maintenance, inspection, and testing of the pipeline. The causes of pipeline failures, such as third party excavation damage, corrosion, material defects, and events of nature, shall also be communicated.

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## 6.21 RIGHT OF WAY ENCROACHMENT

Some right of way (ROW) encroachments increase the chance of third-party damage and inhibit the Company's ability to perform critical activities. The Company shall communicate that, in order to conduct surveillance, routine maintenance and inspections, the Company must be able to access the ROW, as provided in the easement agreement. The Company shall also indicate that to ensure access for maintenance and during emergencies the area must be clear of trees, shrubs, buildings, fences, structures, or any other encroachments. The Company will point out that the landowner has the obligation to respect the pipeline easement by not placing obstructions or encroachments there, and that maintaining an encroachment-free ROW is essential for pipeline integrity and safety.

The Company shall consider communicating with local authorities regarding effective zoning and land use requirements/restrictions that protect existing pipeline ROWs from encroachment. Communications with local land use officials may include consideration of the following:

- How community land use decisions (e.g. planning, zoning, etc.) impact community safety;
- Requiring prior authorization from easement holders in the permit process so that construction/development does not impact the safe operation of pipelines;
- Requiring the Company involvement in road widening or grading, mining, blasting, dredging, and other activities that impacts the safe operation of the pipeline.

When land use and planning messages are communicated, the Company will use the following PHMSA information, "Safety Guidelines to Better Protect Communities Close to Transmission Pipelines", December 16, 2010.

Residents, excavators, and land developers shall be directed to contact the Company if there are questions concerning the pipeline or the ROW. Major projects may further require early coordination with the Company. These audiences shall also be informed that they may be required by state law to provide at least 48 hours advance notice, more in some states, to the appropriate One Call Center prior to performing excavation activities

## 6.22 SPECIAL EMERGENCY PROCEDURES

Procedures shall be communicated to specific stakeholder audiences if the pipeline contains product that, when released, could be immediately hazardous to health (e.g. high concentrations of H<sub>2</sub>S, benzene, anhydrous ammonia, etc.).

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Where appropriate, this shall include product information, steps to take in an emergency, how to contact the Company, and where to find other relevant information.

### 6.23 SPECIAL INCIDENT RESPONSE NOTIFICATION AND EXCAVATION MEASURES

The Company will provide notification and/or evacuation information to residents near liquid or natural gas storage or other major operational facilities along transmission lines. Where appropriate, this shall include product information, steps to take in an emergency, how to contact the Company, and where to find other relevant information.

## 7 DELIVERY FREQUENCIES AND METHODS

Delivery frequencies and methods refer to how often and in what ways public awareness information is presented to stakeholder audiences. These procedures define all the possible potential delivery methods and frequencies in Tables 6-2 thru Table 6-5.

The table below summarizes the delivery frequency and methods currently used by the Company:

**Table 8-1: Baseline and Enhanced Delivery Frequency and Methods**

	<b>Stakeholder Audience:</b>	<b>Baseline Delivery Frequency:</b>	<b>Baseline Delivery Method:</b>	<b>Enhanced Delivery Method:</b>
1.	Affected public	1x per 2 years	Paradigm targeted distribution of print materials	
2.	Emergency officials	1x per year	1) Pardigm targeted distribution of print 2) Face to face and/or emergency drill with responder	None at this time
3.	Public officials	1x per 3 years	Pardigm targeted distribution of print materials	
4.	Excavators	1x per year	Pardigm targeted distribution of print materials	None at this time

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## 7.1 DELIVERY FREQUENCIES

The Company will use the base line frequencies as defined in Tables 7-1 shown above. An increased delivery frequency constitutes an enhancement to the program. The Company has the flexibility to determine if changes to delivery frequencies are necessary as determined by the annual reviews.

The operator is required to deliver the baseline messages to each stakeholder audience based on the delivery frequencies outlined in API RP 1162. The operator should determine the need for additional message delivery based on the operator's results. The operator should determine the need for additional message delivery based on the operator's results. For example, if a large percentage of mailed documents were undeliverable, perhaps a second mailing would be warranted.

## 7.2 DELIVERY METHODS

The Company shall select the baseline method(s) that would be effective in reaching the identified stakeholder audience. Methods may vary based on many factors, including stakeholder audience and type of pipeline among others. The Company may choose to enhance the public awareness program by employing additional delivery methods. The remaining procedures in this section describe the potential delivery methods will consider for baseline and enhanced programs.

The Company shall not exclusively rely on any one of the following methods to meet baseline public awareness program provisions. Although valuable, some methods on their own are not the most effective manner to communicate baseline messages and may not adequately reach stakeholders. External communication should be designed based on the audiences to be reached. They include the following:

- Company websites;
- Media news coverage;
- Community and neighborhood newsletters;
- Drills and exercises;
- Open houses;
- Community events;
- Charitable contributions;
- Company's employee participation;
- Pipeline markers.

Consideration may be given to joining with other pipeline companies in a local, regional, or national setting to produce and deliver common message materials. This approach may increase effectiveness, avoid conflicting messages, or reduce

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the cost. Caution should be used when joining a program to insure the messages, frequencies, and delivery methods reflect an operator's public awareness program.

Also, in providing materials to stakeholder audiences, it may be advisable to emphasize to recipients (e.g. the owner of an excavation firm or elected official or public agency department head) the importance of disseminating the materials to all appropriate individuals (e.g. supervisors, inspectors, line personnel, and field personnel) within the organization to further enhance safety and reduce potential costs and liability.

The following describes some delivery methods in more detail. These delivery methods describe the potential delivery methods which will be consider for baseline and enhanced programs.

- 7.2.1 Videos may be useful in showing activities such as pipeline maintenance, pipeline routes, simulated or actual spills and emergency response exercises, or actual emergency responses. Such videos may be used for landowner contacts, emergency official meetings, or community meetings. Company may seek videos from trade organizations or develop their own.
- 7.2.2 Electronic mail ("e-mail") may be used to send public awareness information to stakeholders. E-mail contact information may be provided on company handouts and other written communications to encourage two-way communication between the stakeholder and the Company.
- 7.2.3 Company Websites: The Company may use company websites to share public awareness information with stakeholders. In addition, websites may be used to post educational videos, electronic versions of public awareness brochures, and links to other industry resources and organizations. The Company website provides information on a variety of subjects, including the following.

a. General Company Background

In addition to describing the purpose of the pipeline, the website usually includes a general description of the Company pipeline system. This may include the following:

- Owner name(s);
- Region and energy market served;
- General office and emergency contacts telephone numbers and e-mail addresses;
- Products transported;

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- System or general map and location of key offices (headquarters, region, or districts).
- b. Company Pipeline Operations  
A broad overview of the Company's pipeline safety and integrity management approach includes describing the various steps the company takes to ensure the safe operation of its pipelines. While not specifically recommended, additional information to consider for the website includes the following:
  - General pipeline system facts;
  - An overview of routine operating, maintenance, and inspection practices of the system;
  - An overview of major specific inspection programs and pipeline control and monitoring programs.
- c. Transmission Pipeline Maps: A system map is useful for posting on the website. Details on how to obtain additional information may be provided, including reference to the NPMS.
- d. Public Awareness Program: The Company may include a summary of the public awareness program and printed material. Contacts shall be provided for requesting additional information.
- e. Emergency information: The website may contain emergency awareness information, including a summary of the Company's emergency preparedness and information on how the affected public and/or public officials may help protect, recognize, report and respond to a suspected pipeline emergency. Emergency contact information may be prominently listed on the website.
- f. Damage Prevention: The Company may provide or link the viewer to additional guidance on preventing excavation damage, such as 811 and the "Dig Safely" program information, contact information for 811, and the One Call Center in each of the states in which the Company has a pipeline.

### 7.3 MASS MEDIA COMMUNICATIONS

#### 7.3.1 Public Service Announcements (PSAs)

PSAs are non-commercial advertisements, which are communicated through various media, including television, radio, newspapers, magazines, or billboards to inform the public about an issue. Occasionally, radio and television stations allocate free airtime for PSAs. Cable TV public access channels may also be an option.

#### 7.3.2 Media News Coverage

The Company may encourage the media to cover pipeline issues, such as local projects, excavation safety, or the presence of pipelines as part of the energy infrastructure. If the media is reporting on an emergency or

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controversial issue, the Company may leverage the opportunity to reinforce key safety information messages such as damage prevention and the need to be aware of pipelines in the community. Trade magazines such as those for excavators or farmers often welcome guest articles. Local weekly newspapers and “metro” section inserts often include a news release verbatim at no cost.

### 7.3.3 Paid Advertising

The use of paid advertising media such as television ads, radio spots, newspapers ads, and billboards may be made more cost-effective by joining with other pipelines, including local utilities. Some examples are placement of a public awareness advertisement on a phone book cover or in local shopping guides.

### 7.3.4 Community and Neighborhood Newsletters

Posting of pipeline safety or other information to community and neighborhood newsletters may be done in conjunction with outreach to those communities and/or neighborhoods and may sometimes be free of charge. The Company may also develop their own newsletters tailored to specific communities.

### 7.3.5 Personal Contact

Personal contact between the Company and the intended stakeholder audience is usually a highly effective form of communication, and it may help build stakeholder trust. This may be done on an individual basis or in a group setting. Some examples of communications through personal contact are as follows.

### 7.3.6 Door to Door Contact

On-site visits to specific stakeholders located near the pipeline, which are conducted by the Company or its representative.

### 7.3.7 Telephone Calls

Telephone calls to specific stakeholders located near the pipeline, which are conducted by the Company or its representative.

### 7.3.8 Group Meetings

The Company may elect to conduct stakeholder meetings individually or in conjunction with other operators. Some examples of stakeholder group meetings may include: emergency officials, public officials, state One Call Centers, excavators, land developers, schools, community/neighborhood organizations, etc.

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### 7.3.9 Drills and Exercises

Information on unified (incident) command system roles, operating procedures, and preparedness for various emergency scenarios may be communicated effectively to emergency officials during drills and deployment exercises.

### 7.3.10 Open Houses

The Company may hold open houses to provide an informal setting to introduce an upcoming project, provide a “get-to-know-your-neighbor” atmosphere or to discuss an upcoming maintenance activity such as pipeline segment replacement. Such events may include tours of company facilities, question-and-answer sessions, videos, and other presentations. Targeted or mass mailings may be used to announce planned open houses and can, in themselves, communicate important information.

### 7.3.11 Community Events

Community-sponsored events, fairs, charity events, job fairs, trade shows, or civic events may provide opportunities to communicate with stakeholders. Companies may participate with a booth or as a sponsor of the event

### 7.3.12 Charitable Contributions

In some cases, contributions to charities and civic causes may provide opportunities to convey public awareness messages. Some examples include the following:

- Sponsorship of emergency responders to fire training school;
- Contribution of natural gas detection equipment to the local volunteer fire department;
- Donation of funds to acquire or improve nature preserves or green space,
- Sponsorship to community arts and theatre;
- Support of scholarships (especially when degree programs are relevant to the company or industry).

### 7.3.13 Company Employee Participation

As members of communities and community service organizations, informed employees of the Company may play an important role in promoting pipeline awareness. The Company may include in the public awareness program provisions for familiarizing employees with public awareness information and materials. Many public awareness programs

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include components for key employee training in public awareness and communication training for key employees.

The Company employees may be a key part of public awareness efforts. Grassroots employee contacts and communications may be particularly important in reaching out to a community. Interested employees shall be given the necessary training, communications materials, and as appropriate, opportunities for direct involvement with the community.

#### 7.3.14 One Call Center Outreach

Operators are required by 49 CFR Parts 192.614 and 195.442 to become members of One Call Centers. Most state One Call Centers implement public awareness activities about the One Call requirements and the 811 Call Before You Dig message. The Company may count such communication as part of their public awareness programs.

#### 7.3.15 Targeted Distribution of Print and Other Materials

Print materials are used to communicate general public awareness messages to stakeholder audiences. They afford an opportunity to communicate content in a graphical or pictorial way. The Company shall consider the type, language, and design of the print material, based on the audiences to be reached.

Print materials may be mailed to residents or communities along the pipeline system or handed out at local community fairs, open houses, or other public forums. Information may be obtained from the postal service or service provider on size, folding, and closure requirements to minimize the postage costs for mass mailings. Outside consultants may be used to assist with printing, identification of addresses, mailing, and documentation.

Some examples include the following:

- Brochures (flyers or leaflets), small booklets or pamphlets containing educational material;
- Letters (including door hangers);
- Maps;
- Response cards (referred to bounce back cards or business reply cards), used to maintain/update current mailing lists, permit the recipients to notify the Company of any changes in address, provide a way for recipients to make comments, request additional information, raise concerns or ask questions, and help evaluate the effectiveness of the Company's public awareness program;

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- Bill stuffers (printed materials that LDCs frequently send to customers along with invoices);
- Specialty advertising materials, including refrigerator magnets, calendars, day planners, thermometers, key chains, flashlights, hats, jackets, shirts, clocks, wallet cards, and other such items containing a short message (e.g. 811 Call Before You Dig, the company logo, and/or contact information);
- Training materials designed to increase knowledge and skills in responding to pipeline emergencies;
- Electronic materials (including videos, CDs, PowerPoint presentations, PDFs, etc.).

#### 7.3.16 Pipeline Marker Signs

Pipeline marker signs are valuable tools for educating the public regarding the general location of pipelines. For more information, see 49 CFR Parts 192.707 and 195.410 and API 1109.

## 8 PROGRAM IMPLEMENTATION AND ENHANCEMENTS

Program implementation refers to actions that the Company will take to plan, conduct, review, evaluate, document, and improve a public awareness program. At any time during program implementation, the Company may enhance a baseline program. The Company has developed a specific process for considering whether enhancements are warranted to achieve awareness objectives.

### 8.1 PROGRAM IMPLEMENTATION

To implement the program, the Company shall do the following:

- Develop a schedule for conducting the program activities; (see table in 9.1)
- Develop resource and obtain monetary support; (see team charter)
- Identify, assign, and task participating company employees needed to implement the program; (see team charter)
- Identify external resources or consultants needed; (see table 6-1)
- Conduct program activities like mass mailings, emergency official meetings; (see table 7-1)
- Periodically update the program with newly identified activities; (see section #9 and annual agenda review)
- Collect feedback from internal and external sources. (see table 9-1)

The Company will use the public awareness agenda as an aid in reviewing and implementing its public awareness program.

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**Table 8-1: Schedule for Conducting Program Activities**

	<b>Stakeholder Audience:</b>	<b>Delivery Frequency:</b>	<b>Deliver Method or Required Documentation:</b>	<b>Comments:</b>
1.	Affected public mailers	1x per 2 years	Paradigm brochure mailer	
2.	Emergency officials mailers	1x per year	Pipeline Association for Public Awareness magazine mailer	
3.	Public officials mailers	1x per year	Pipeline Association for Public Awareness newsletter mailer	This is enhanced frequency. Normal frequency is 1x/3yrs
4.	Excavators mailers	1x per year	Pipeline Association for Public Awareness magazine mailer	
5.	One Call Center mailers	1x per year	Pipeline Association for Public Awareness magazine mailer	
6.	Affected public survey of	1x per year	Paradigm survey cards and summary report	
7.	Implement program enhancements	As recommended by annual reviews	As recommended by annual reviews	
8.	Pre-test effectiveness of	Initially, when changes made	Paradigm or Pardigm surveys	
9.	Annual Self-Assessmen	1x per year	PA agenda and PA implementation form	
10.	Complete program review	1x per 4 years	PA agenda and program review form	

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## 8.2 PROGRAM ENHANCEMENTS

To determine if some additional level of public awareness communication is warranted beyond the baseline program, the Company shall conduct an annual review for program enhancement using the factors listed below. Results of the annual program review for enhancements shall be part of the public awareness team charter documentation. See section #5 and team charter for details. Factors the Company will use for review of annual enhancements are as follows:

- Agricultural activity including additional reach out to farmers rather than grouping them with other affected public;
- Third-party damage incidents (e.g. Company data show damages or near misses have increased);
- Public inquiries or concerns tracked;
- Land development activity and encroachment (e.g. developers perform frequent excavations near pipeline);
- New developments constructed right after mailings sent to affected public;
- Increased frequency to apartment complexes, or other areas with there is high turnover;
- Change in product or increase in pressure that would increase the coverage area;
- Potential hazards (e.g. increased risk due to characteristics of product transported);
- High consequence areas (HCAs) (e.g. potential impact is greater for a specific area) and pipeline release consequences;
- Population density (e.g. pipeline traverses densely populated urban area);
- Environmental considerations (e.g. pipeline route traverses environmentally sensitive area
- Pipeline history in an area (e.g. frequent number of incidents in a particular area);
- Specific local situations (e.g. heightened public concern about pipeline safety);
- Increased coverage areas for large high-pressure pipelines where the calculated potential impact radius (PIR) is greater than 660 feet;
- Increased frequencies or other enhancements to pipelines with alternative MAOP (greater than 80%) or special permits;
- Regulatory actions (e.g. advisory bulletin, findings from inspection);
- Results from previous public awareness program annual implementation reviews;
- Results from previous public awareness program four (4) effectiveness reviews;

Program enhancements that shall be considered include:

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- Increased Frequency—providing communications to specific stakeholder audiences on a more frequent basis (shorter intervals) than the baseline public awareness program provisions;
- Additional Message Content—providing re-phrased, different, or additional messages to specific stakeholder audiences beyond the baseline messages, and/or tailoring messages to address specific audience needs;
- Alternative Delivery Method(s)—using different delivery methods (e.g. neighborhood meetings, door hangers, personal contact, etc.) to reach the target stakeholder audience;
- Increased Coverage Area—broadening or widening the stakeholder audience coverage area (e.g. widening the buffer distance for reaching the stakeholder audience).

If a determination has been made that enhancements are warranted, the Company shall implement an enhanced public awareness program and communicate to the appropriate personnel as described on the team charter.

## 9 EVALUATIONS

The purpose of the evaluation of the public awareness program is to:

- Assess whether the current program is effective in achieving the objectives for the Company’s public awareness programs;
- Provide the Company with information to determine whether program changes may be warranted.

The Company program evaluation shall include the following elements:

- Pre-test effectiveness of materials;
- Assess program implementation;
- Measure program effectiveness.

Based on the results of the evaluation, the Company may determine that changes to the program are warranted to meet awareness objectives, including program implementation or elements, such as stakeholder identification, messages, delivery methods, or delivery frequencies. After completing the evaluation process, the Company shall document whether changes are needed or not.

An industry-conducted survey may be used for an operator’s PAP effectiveness evaluation, provided the operator can extract information specific to the type of system, product, and geographic locations.

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Table 9-1 list methods and options available that the Company will use for baseline or enhanced program based on API #1162. Table 9-2 below describes current methods and frequencies the Company is using to evaluate the public awareness program.

**Table 9-1: Program Evaluation Frequency and Method Options**

<b>Method:</b>	<b>Technique:</b>	<b>Frequency:</b>
Pre-test effectiveness of materials	Focus groups (in-house or external participants)	Upon initial design or major redesign of public awareness materials
Assess program implementation	Internal self-assessment, third-party assessment, or regulatory inspection	Annually
Measure program effectiveness: <ul style="list-style-type: none"> <li>• Outreach,</li> <li>• Message comprehension,</li> <li>• Results.</li> </ul>	1) <i>Survey</i> —Assess outreach efforts, audience knowledge, and any anecdotal changes in behavior if available: <ul style="list-style-type: none"> <li>• Company designed and conducted survey;</li> <li>• Use of pre-designed survey by third party or</li> <li>• Industry association; or</li> <li>• Trade association conducted survey segmented by operator, state, or other relevant separation to allow application of results to each operator.</li> </ul> 2) Assess notifications and incidents to determine any anecdotal changes in behavior if available. 3) Documented records of incidents to evaluate bottom-line results.	Every four years

### 9.1 PRE-TEST EFFECTIVENESS OF MATERIALS

A focus group is a group of people gathered to provide feedback about the materials or other aspects of a public awareness program. Upon initial design or major redesign of materials, the Company shall pre-test materials in a focus group before they are distributed.

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Typically, a focus group has about 6 to 12 participants. While focus groups may be professionally facilitated, feedback about public awareness materials may be gained by an informal discussion run by individuals connected with the public awareness program. Often participants will be asked to review draft materials and comment on message clarity and what appealed or did not appeal to them. Focus groups may also be used to provide input on the relative effectiveness of various means of delivery.

Focus group participants may be the Company employees who are not familiar with the public awareness program, citizens living along a pipeline, representatives of homeowner associations, or business people along the pipeline. Target stakeholder audiences generally are not mixed. The participants usually are not chosen at random but rather are selected to be reasonably representative of the stakeholder group and capable of articulating their reactions to the materials.

The Company is currently using the pre-test effectiveness of material method as shown in table 9-2 below.

**Table 9-2: Program Evaluation Method Currently Used by the Company**

<b>Method:</b>	<b>Stakeholder Audience:</b>	<b>Technique:</b>	<b>Frequency:</b>
Pre-test effectiveness of materials	Affected Public	External focus group through Paradigm	Initially and redesign of PA materials
	Emergency Officials	External focus group through Pardigm	
	Public Officials	External focus group through Pardigm	
	Excavators	External focus group through Pardigm	
Assess program implementation	Affected Public	Internal self-assessment, third-party assessment and/or PHMSA PA protocols	Annually
	Emergency Officials	Internal self-assessment, third-party assessment and/or PHMSA PA protocols	
	Public Officials	Internal self-assessment, third-party assessment and/or PHMSA PA protocols	

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	Excavators	Internal self-assessment, third-party assessment and/or PHMSA PA protocols	
Measure program effectiveness	Affected Public	Survey through Paradigm and company review	Every 4 years
	Emergency Officials	Survey through Pardigm and company review	
	Public Officials	Survey through Pardigm and company review	
	Excavators	Survey through Pardigm and company review	

## 9.2 ASSESS PROGRAM IMPLEMENTATION

The Company shall complete an annual assessment of the program to answer the following questions.

- Has the program been developed and written to address the objectives, elements, and baseline schedule as described in this RP?
- Has the written program been implemented as planned and documented appropriately?

The Company is currently using method as shown in table 10-2 above for assessing program implementation.

As indicated in API RP 1162, there are three acceptable annual audit methods: internal self-assessments, third-party audits, or regulatory inspections.

## 9.3 MEASURE PROGRAM EFFECTIVENESS

Measurement of PA program effectiveness shall be conducted. Several different methodologies, either quantitative or qualitative, may be used. Options to measure attitudes and opinions may include the following:

- Surveys: develop and conduct a survey using internal or external expertise, or participate in a joint survey (mail, phone, Internet);
- Focus groups (mail, phone, Internet);
- Data reports;
- Analyses of business reply cards.

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Program effectiveness measurement is meant to validate the Company's methodologies and the content of the materials used at least every four years. Upon initial measurement, improvements shall be incorporated into the program based on the results. Once validated in this initial manner, program effectiveness measurement shall be conducted at least

once every four years. However, additional measurement may be appropriate to validate a program after major design changes.

NOTE: For example, if the Company began implementing its program on June 20, 2010, then program effectiveness measurement would be due by June 20, 2014. Subsequent measurement shall be conducted every four years. In this example, future measurement would be due by June 20, 2018. The following three measures describe what areas the Company shall evaluate for effectiveness.

- Measure 1—Outreach
- Measure 2—Message comprehension
- Measure 3—Achieving results.

The Company will collect anecdotal information that may provide insight into actual behavioral changes whenever the opportunity arises. The Company would like to know that stakeholders are aware of what to do and that they have acted on that knowledge appropriately (performing the correct prevention and mitigation behaviors according to circumstances). However, information on actual behavior by the stakeholder is rarely available. Anecdotal information regarding actual stakeholder behavior can be used along with other effectiveness measurement information. In some circumstances, it may be possible to ask the stakeholders what actions were taken in a given situation, e.g. such as during a post-incident inquiry of how individuals responded. In other situations, information such as notifications received by the Company from the One Call Center

(e.g. a noticeable increase following distribution of public awareness materials) may help demonstrate that stakeholders performed desired behaviors.

The Company is currently using the method as shown in table 9-2 above for measuring program effectiveness.

### 9.3.1 Measure 1 – Outreach

To help assess if public awareness messages are getting to the intended stakeholders and to evaluate the effectiveness of the delivery methods used, the Company shall track the number of individuals or entities attempted to be reached within an intended stakeholder audience (e.g.

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affected public, excavators, public officials, and emergency officials) and estimate the percentage for each intended stakeholder audience actually reached within the targeted geographic area(s). The Company will consider tracking the number of:

- Phone inquiries received by the Company;
- Visits to the public awareness portions of the Company’s website;
- Response cards received by the Company;
- Public officials or emergency officials who attend emergency response exercises (this is an indicator of interest and the opportunity to gain knowledge).

Currently, measure #1 is conducted by Paradigm. The Company reviews the data during annual reviews.

### 9.3.2 Measure 2 – Message Comprehension and Behavior

To evaluate the effectiveness of the message content, the Company shall measure the following:

1. The percentage of the intended stakeholders that understood the message,
2. The retention rate of the stakeholders and specific messages.

One possible method for assessing understandability is to survey the target stakeholder audience through personal, telephone or written surveys. Sample surveys are included in API #1162 Annex D. Factors to consider when designing surveys include the following.

- Sample size appropriate to draw general conclusions;
- Questions to gauge understandability of messages and knowledge of survey respondent. For example, one question could ask how a person might respond in a hypothetical situation, such as, “If you observed a suspected leak in a pipeline, what would you do?”;
- Retention of messages.

Currently, measure #2 is conducted by Paradigm. The Company reviews the data during annual reviews.

### 9.3.3 Achieving Results

One measure of the “bottom-line results” is the change in the number and consequences of third-party incidents. As a baseline, the Company will track the number of incidents and consequences caused by third-party excavators. If available, other data to be considered may include:

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- Number of leaks or failures caused by TPD or 2nd party damage (contractor hired by the Company)
- Number of leaks or failures caused by previously damaged pipe
- Number of leaks or failures caused by vandalism
- Number of repairs implemented as a result of TPD prior to a leak or failure
- Reported near misses including digs without One Calls
- Reported pipeline damage that did not result in pipeline failure

While third party excavation damage is a major cause of pipeline incidents, data regarding such incidents shall be evaluated over a relatively long period of time to determine any meaningful trends relative to the Company's public awareness program. This is due to the low frequency of such incidents on a specific pipeline system. The Company shall also look for other types of bottom-line measures.

#### 9.4 COMPLETION OF EFFECTIVENESS EVALUATION

Gathering survey/assessment data alone does not constitute a pipeline operator's completion of a PAP effectiveness evaluation. The operator must be able to:

- Specify any findings or conclusions related to its program effectiveness, based on the gathered data;
- Identify and implement recommended changes and improvements to its program based on its conclusions; and
- Discuss the methodology used to evaluate its program effectiveness for all stakeholder audiences.

### 10 DOCUMENTATION

The Company shall collect and retain documentation of the public awareness program. These records demonstrate that the Company's program is in conformance with these procedures.

#### 10.1 WRITTEN PROGRAM DOCUMENTATION

The written program shall include the following:

- A statement of management commitment to achieving effective public/community awareness;
- A description of the roles and responsibilities of personnel administering the program;
- Identification of key personnel and their titles (including management responsible for program support through company policy, management participation, and allocation of resources and funding of the program);

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- Identification of the media and methods of communication to be used in the program;
- Documentation of the frequency and the basis for selecting that frequency for communicating with each of the targeted audiences;
- The process for identifying program enhancements beyond the baseline program, including the basis for implementing such enhancements;
- The program evaluation process, including the evaluation objectives, methodology to be used to perform the evaluation and analysis of the results, and criteria for program improvement based on the results of the evaluation.

## 10.2 OTHER DOCUMENTATION RECORDS

Following are more examples of documentation records:

- Communication materials provided to each stakeholder audience (e.g. brochures, mailings, letters, etc.);
- Lists, records, or other documentation of stakeholder audiences with whom the
- Company has communicated (e.g. contact mailing rosters);
- Implementation dates;
- Postage receipts;
- Response cards;
- Audience contact documentation (e.g. sign-in sheets, invitation lists, etc.);
- Program evaluations, including current results, follow-up actions and expected results;
- Program enhancement(s).

## 10.3 RECORD RETENTION

The record retention period shall be a minimum of five (5) years, or as defined in the Company's public awareness program, whichever is longer. Record retention shall include:

- Lists, records, or other documentation of stakeholder audiences with whom the Company has communicated;
- Copies of all materials provided to each stakeholder audience;
- All program evaluations, including current results and follow-up actions.

Operators should have their written PAP and records such as stakeholder lists, brochures, or pamphlets indicating message, documentation of sent messages, maps, procedures, plans, evaluation results, follow-up actions, and other relevant documentation that supports compliance.

Operators must maintain records of key program documentation to demonstrate compliance with the public awareness regulations. Under §192.616(c) and §195.440(c), each operators must follow the general program recommendations which include retaining records for each category listed in API RP 1162 for a

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minimum of five (5) years, or as defined in the operator's PAP, whichever is longer.

#### 10.4 IMPLEMENTATION OF PUBLIC AWARENESS PROGRAM

The Company will use the public awareness agenda for implementation of these procedure requirements. The Company will conduct this PA agenda review a minimum of once per calendar year not to exceed 18 months.

As a minimum the following agenda items will be defined or included:

- Public awareness agenda objectives
- List of personnel that shall attend including name and job title
- Frequency of the public awareness review
- Description of how the review will be conducted
- List of procedures, regulations, and reference documents that will be available during the review
- List of forms, documents, and procedures needed to complete the review
- List of required records needed to complete the review
- Attendance sheet including signature
- Action item list as a result of the PA review

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