

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

PUBLIC AWARENESS PLAN

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

West Texas Gas Utility, LLC. 22435
Western Gas Interstate Company, LLC. 22462
WTG Gas Transmission Company, LLC. 31968
WTG Hugoton, L. P. 32314
WTG NGL Pipeline Company, LLC 38938
Louisiana State Gas, LLC. 40303



REVISION 7.1

Public Awareness Plan

Review and Revision Log

This Public Awareness Plan must be reviewed annually to assure that there has been a self-assessment of the implementation of this plan. It also must be reviewed at a frequency not to exceed four years for an evaluation of effectiveness of the overall program implementation. Any changes will be reflected in these reviews and/or revisions.

Review/Revision Date	Revision Number	Revision Description	Revision Justification
March 2006	0	New Document	
January 2009	0.1	Revised to reflect West Texas Gas owned distribution and transmission in KS, OK, NM, TX, and LA.	
March 2011	0.2	Revisions in Sections 6 & 9	
August 20, 2012	1	Additions / Corrections throughout program to include unique attributes and characteristics of WTG facilities, as per instruction from PHMSA CPF 4-2012-1008.	Complete revision of entire PAP plan per instruction from PHMSA audit CPF 4-2012-1008.
January 1, 2013	2	Revisions in Sections 2.1, 5.5.4, and 9.1	<p>Sec 2.1 – Due to the rural nature of many WTG pipelines, WTG has elected to mail to physical addresses only with the exception of LDC companies.</p> <p>Sec 5.5.4 – Per PHMSA Safety Bulletin ADB-12-08</p> <p>Sec 9.1 – WTG will use third-party contractors for all ROW mail outs beginning in 2013.</p>
September 3, 2013	3	Sec 1.1, 5.3, 5.5.1, 5.5.2, 7.2, 8.2, and 9.4.	Wording changes were inserted to clarify issues identified in the TRRC audit in 4/2013. Change of PAP Administrator to Jeff Henderson.

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Review/Revision Date	Revision Number	Revision Description	Revision Justification
10/19/2015	4	Updated MOC process	To reflect the WTG O&M MOC
5/1/2018	5	General Update	Update Mapping & Company personnel
10/2019	6	Update Wording, Formatting, & Company personnel	This revision reflects administrative changes, the MOC was not altered, therefore senior management review was not required.
1/2022	7	Update Company Name	This revision reflects administrative changes, the MOC was altered, therefore senior management review is required.
2/2022	7.1	Revised section 6.3.3 and the name on the company map	This revision reflects administrative changes, added (within 15 months from last meeting) in section 6.3.3.

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Public Awareness Plan

Article 1 – Introduction and Scope

1.1 Introduction

This Public Awareness Plan (PAP) includes West Texas Gas Utility, LLC. and its subsidiaries and/or affiliates (WTG). This written PAP plan is to comply with the Code of Federal Regulation (CFR) Part 192 and Part 195, specifically CFR §192.616 and 195.440. American Petroleum Institute's (API) Recommended Practice (RP) 1162 1st addition 2003 (API RP 1162) is incorporated into these regulations by reference and is a major part of this program.

WTG headquarters is located at 303 Veterans Airpark Ln. Ste 5000 Midland, Texas 79705. WTG has core businesses in natural gas distribution operations, Interstate and Intrastate natural gas transmission services, gas gathering/processing, and Intrastate hazardous liquids (NGL) transmission services. WTG owns and operates approximately 5,764 miles of Natural Gas Distribution mainlines and serves approximately 31,310 customers within the states of Oklahoma and Texas. WTG owns and operates approximately 1,993 miles (noncontiguous) of natural gas transmission pipelines within the states of Kansas, Louisiana, New Mexico, Oklahoma, and Texas. WTG owns and operates 5 miles (non-contiguous) of regulated gathering pipelines within the states of Kansas, Louisiana, Oklahoma, and Texas. WTG owns and operates approximately 42 miles (non-contiguous) of hazardous liquids (NGL) Transmission pipelines within the state of Texas. This PAP is inclusive for all of WTG's pipelines/facilities. The PAP oversight is the responsibility of the PAP administrator and this individual's office is in the Amarillo Regional office. The address for the Amarillo Regional office is 8701 Strawberry Fields East Amarillo, TX 79119. The PAP administrator's roles and responsibilities are described in section 5.3 of this document.

Maps showing the location of WTG's pipelines and facilities which includes applicable HCAs are in [Appendix A](#). Additional details of pipelines and facilities (i.e., compressor stations, block valves, regulator stations, odorizer, etc.) can be obtained by contacting the WTG compliance /mapping department in Amarillo, TX. The mailing address is 8701 Strawberry Fields East Amarillo, TX 79119, by phone at (806)358-1321 or by email at wtgmapping@westtexasgas.com. Requests for additional information must be made in writing and approved by senior management prior to release.

Public Awareness Plan

1.2 Scope

Public Awareness and understanding of pipeline operations is essential to the continued safe operation of WTG facilities and pipelines. This PAP is an important factor in establishing communications and providing information necessary to help the public understand that pipelines are the major transportation system for natural gas in the states which WTG operates. A properly administered PAP will help the public learn how pipelines function and promote the public's awareness of their responsibilities to help prevent damage to pipelines.

WTG's PAP will address the needs of different segments of the public within the areas served and is flexible enough to change as the pipeline system changes or as the public's needs for information change. WTG's management believes this program can provide increased public and environmental safety by providing an atmosphere which leads to trust and a good relationship between WTG and the public along the pipeline routes, acceptance of pipeline personnel while performing safety, maintenance and operations functions and other right-of-way activities, and the public's cooperation in assisting WTG to continue to operate a safe pipeline system. The continual process of development, implementation and evaluation is critical to the success of WTG's PAP and public safety.

Public Awareness Plan

Article 2 – Regulatory Compliance

2.1 Compliance

WTG will fully comply with 49 CFR Parts 192 and 195 (including API RP 1162). Any variances will be appropriately documented to include the reason for the variance and what actions are being taken to assure that the overall effectiveness of the PAP is not compromised.

2.2 Public Education

WTG delivers PAP messages through a direct mail out campaign (brochures). Due to the rural nature of many of our pipelines, WTG omits P.O. Box addresses except for WTG LDC customers who may or may not have a physical address. All stakeholder audiences will be mailed by a third-party contractor. Samples of this information are found in [Appendix B](#). The frequency of the PAP messages is in accordance with API RP 1162, and listed in [Appendix C](#). The PAP message is provided in both English and Spanish. Spanish is the predominate language other than English within WTG's operational areas. The determination for the use of Spanish was made by management and determined by local knowledge within all our service areas. The PAP administrator will review the Modern Language Association Web site (https://apps.mla.org/map_data) annually to assure that the second language within WTG operational areas is Spanish. In the event this review determines any language other than Spanish has become significant (greater than 20%), WTG will begin delivering the PAP message in the additional language. This review will be documented on the annual checklist found in [Appendix E](#).

2.3 Emergency Responder Liaison Activities

WTG conducts annual face to face meetings between WTG district personnel and emergency responders within their area of responsibility. Emergency Responders are defined in Article 5.5.2 of this plan. These meetings are documented on the Public Emergency Response Agency Information form found in [Appendix D](#). In addition, WTG will take part in any training activities requested in writing by any emergency responder organization. The face-to-face liaison is completed in addition to the mail out conducted as stated in 2.1.

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2.4 Damage Prevention

WTG's Damage Prevention Program procedure can be found on the intracompany website. WTG is an active member within the states that we operate in for "one call" centers and 811. WTG is compliant with 49 CFR Parts [192](#) and [195](#) for damage prevention (i.e. pipeline marker, pipeline patrols, etc.).

2.5 Other Regulations/Policies

All schools within 1000 feet of the centerline of a WTG facility will be sent a PAP brochure from a third-party contractor.

2.6 Other Resource

WTG's website will include links to website which contains additional information concerning public awareness. The websites included are:

American Petroleum Institute (API) www.api.org

American Gas Association (AGA) www.aga.org

Texas Railroad Commission (TRC) www.rrc.state.tx.us

US Department of Transportation / Pipeline Hazardous Material Safety Administration (PHMSA) phmsa.dot.gov

National Pipeline Mapping System (NPMS) www.npms.phmsa.dot.gov

811 www.call811.com

Oklahoma One Call Center www.callokie.com

Kansas One Call Center www.kansasonecall.com

New Mexico One Call Center www.nm811.org

Louisiana One Call Center www.laonecall.com

Texas One Call Center www.texas811.org

Public Awareness Plan

Article 3 – Terms, Definitions, Acronyms, and Abbreviations

3.1 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.
Public Awareness Program	An operator’s program to make the public aware of their pipeline facilities, which will assist in the prevention of third-party damage and increase the public’s safety in the general area of the operator’s facilities.
Baseline Public Awareness Program	A public awareness program’s minimum activity as stated with API RP 1162.
Enhanced Public Awareness Program	Components of a public awareness program that exceed baseline activities stated within API RP 1162.
Right of Way (ROW)	Defined land, on which an operator has the right 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.
Encroachment	Unauthorized advancement onto or within the operator’s ROW.
Operator	A company who owns and/or operates pipeline facilities.
High Consequence Area	A location near a pipeline where an incident could have greater consequences to health and safety or the environment (see 49 CFR Parts 192 and 195).

Public Awareness Plan

3.2 Acronyms / Abbreviations

The following acronyms are used throughout this manual:

Term	Definition
WTG	West Texas Gas and its Subsidiaries and/or Affiliates
PAP	Public Awareness Plan
API RP 1162	American Petroleum Institute Recommended Practice 1162 As incorporated by reference in 49 CFR 192 and 195.
811	Toll Free National Call Before You Dig Number
ROW	Right of Way
HCA	High Consequence Area
LEPC	Local Emergency Planning Committee
O/M Manual	WTG Operations & Maintenance Manual
MOC	Management of Change Process

Public Awareness Plan

Article 4 – Overview

4.1 Overview

WTG's PAP is a twelve-step process that is continuous in nature. Each of the twelve steps listed below are explained in detail within articles 5 through 10. While the first three steps are fixed, steps four thru twelve are reviewed annually and changed as needed. The twelve steps of the plan are defined as:

1. Define Objectives (article 5.1)
2. Management Support (article 5.2)
3. Establishment of Program Administration (article 5.3)
4. Identify Pipeline Assets (article 5.4)
5. Identify Stakeholder Audiences (article 5.5)
6. Develop PAP Message (article 6)
7. Establish PAP Message Delivery Frequency (article 7.1)
8. Establish PAP Message Delivery Method (article 7.2)
9. Assess Need for Program Enhancements (article 8.1)
10. Implement Program (article 8.2)
11. Perform Program Evaluation (article 9)
12. Update Program Documentation (article 10)

Public Awareness Plan

Article 5 – Program Establishment

5.1 Objectives

The three (3) main objectives for the PAP are to:

1. Heighten the Public's awareness/knowledge of WTG's pipeline/facilities by:

- Making the public aware of the pipeline's presence within the communities where the public lives and works.
- Communicate the significant role the public plays in identifying and responding to emergency situations.
- How to react if the public notices the ROW being encroached.
- Describe the hazards that could be present during a release.
- Additional safety and integrity actions taken by WTG in or near High Consequences Areas.
- Communicate WTG's safety record and how reliable the pipeline industry is.

2. Enhance Damage Prevention for WTG's pipeline/facilities by:

- Making the public aware of the use of One Call Centers (811)
- Describe how to recognize WTG's pipeline/facilities markers
- Describe what to do in the event the public recognizes ROW encroachment
- Where to view the NPMS website
- How to respond to suspicious activity near the pipeline/facilities

3. Describe how to Respond in the event of a pipeline emergency:

- The use of the individual's senses (sight, smell, hearing) to detect an emergency
- Who to contact
- What the individual should and should not do during a release or an emergency
- The information that is needed to assist WTG for response

Public Awareness Plan

5.2 Management Commitment

WTG management's commitment and ongoing support for its PAP is demonstrated through company policy, management participation, and allocation of resources and funding. Management believes that its full support will make a marked difference in the way its PAP is established, implemented, carried out by all WTG employees, and received by the public. Management support can positively affect the overall effectiveness and success of the program.

Affirmed Support:

VP of Operations:  Date: 2/8/2022

PAP Administrator: *Brian Branton* Date: 2/8/2022

Director of Compliance: *Ray Reed* Date: 2/8/2022

Public Awareness Plan

5.3 Program Administration Roles and Responsibilities:

Vice President of Operations (Bart Bean)

- Provide support of the PAP by assuring enough resources (manpower & financial) are available to provide an effective/successful program.
- Provide support by being a liaison between PAP staff and district personnel.
- Assist in oversight of PAP to ensure all federal and state regulations are included within current version of PAP.
- Assist in the oversight that O&M works hand in hand with PAP

Director of Integrity Management (Ray Reed)

- Provide support by being a liaison between PAP staff and district personnel.
- Assist in oversight of PAP to ensure all federal and state regulations are included within current version of PAP.
- Ensure HCA areas are included and emphasized within the PAP.
- Provide support to PAP Administrator with assistance and oversight of the PAP

PAP Administrator (Brian Branton)

- Fully understand WTG's PAP and the need to be compliant with CFR §192.616, §195.440 and API RP 1162 within the plan.
- Administer and Manage the PAP which includes but not limited to: establishment, development, and implementation, assessment of program, evaluation and documentation of the plan.
- Assist the District/Division Managers to identify the stakeholder audiences.
- Assist the District/Division Managers to build a working relationship with Local Public Officials and Emergency Response Officials that will enable a fast and positive response to any WTG pipeline emergency.
- Work with state "one-call" centers to reduce third-party damage.
- Periodic review of PHMSA and state agency web site for new or pending regulation, safety bulletins, etc.
- Manage the third-party contractors.

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District/Division Managers

- Provide liaison with the Local Public Officials and Emergency Response Officials to insure a fast and positive response to any WTG pipeline emergency.
- Work with Local Excavators to reduce third-party damage.
- Work with PAP administrator to determine stakeholder audiences.

District Employees

- Work with members of management to enhance public safety which would include but not limited to: emergency response per company procedures, complete damage prevention assignment's in a timely manner and be a good steward between WTG and the public

External Resources

- A third-party contractor communicates the intended message to the appropriate stake holder audiences via mass mailing of detailed audience specific brochures. In addition, the third-party contractor compiles data regarding the effectiveness of the message delivery, as well as statistical analyses and effectiveness evaluation. The third-party contractor also plays a significant role in designing the audience specific brochure used in the mass mailing.

5.4 Pipeline Assets

This PAP is inclusive to all WTG assets. Details for general company/district assets can be found in [Appendix A](#). Additional specific details of pipelines and facilities (i.e. compressor stations, block valves, regulator stations, odorizer, etc.) can be obtained by contacting the WTG compliance /mapping department in Amarillo, TX. The mailing address is 8701 Strawberry Fields East Amarillo, TX 79119 or by phone at (806)358-1321 or by email at wtgmapping@westtexasgas.com. Any additional information requested will have to be made in writing and approved by senior management prior to release.

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5.5 Stakeholder Audiences

5.5.1 Affected Public for all WTG pipelines and facilities

The Affected Public stakeholder audiences includes as but not limited to homeowners, tenants, businesses, schools, hospitals, places of congregation, etc. Affected Public stakeholders are identified by two methods: (1) all existing customers are identified within our internal billing system and receive a brochure provided by a third-party contractor. In addition, each new customer receives a PAP brochure at initiation of service. (2) Non-customers that live and/or work adjacent to our facilities and pipelines are identified and receive a brochure provided by a third-party contractor. This contractor uses Standard Industrial Classification (SIC). WTG has set the minimum coverage area for public stakeholders that live, work and places of assembly which occur on regular basis within 660 feet from the centerline of a natural gas distribution pipeline and natural gas gathering pipeline. For transmission pipelines (natural gas and HVL) 1000 feet from the centerline of the pipe will be used. A third-party contractor is used to provide the non-customer address database, this also would include tenants which do not own the property.

5.5.2 Emergency Responders

The Emergency Official stakeholder audience is defined as but not limited to Fire departments, Police/Sheriff, EMS, LEPC, County and State Emergency Management and 911 centers. Notification of the required liaison material is made and documented by WTG with appropriate officials who would respond within the Asset County only. Notification of the Emergency Responders message is made and documented by a third-party contractor with the appropriate officials who would respond within the Asset County only.

5.5.3 Public Officials

The Public Official stakeholder audiences is defined as but not limited to: City/County Managers, Mayors, and City/County Commissioners. Notification is made and documented with appropriate officials within the Asset County.

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5.5.4 Excavators

The Excavator stakeholder audiences is defined as but not limited to construction companies, excavation rental companies, public works officials, landscapers, well drilling companies, railroad companies etc. Third-party contractor makes notification to all excavators that have business addresses within 10 miles of the centerline of WTG's pipeline. This contractor uses Standard Industrial Classification (SIC) to determine which businesses are in the excavation industry. In addition to the fore mentioned excavators, anyone who submitted a one-call request the previous year will be viewed as an excavator and included in notifications.

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Article 6 – Message

6.1 Message

WTG’s PAP message content is compliant with the baseline message content found in API RP 1162 Table 5. There are eight (8) specific messages which will vary depending upon the intended stakeholder audience. The following is breakdown of each message topic and the targeted audience:

Message	Affected Public	Emergency Responders	Public Officials	Excavators
Damage Prevention	T, D, G		T, D, G	T, D, G
Emergency Preparedness		T, D, G		
Leak/damage Recognition & Response	T, D, G	T, D, G	T, D, G	T, D, G
NPMS		T	T	
One Call Requirements	T, D, G		T, D, G	T, D, G
Pipeline Location Information	T, D, G	T, D, G	T, D, G	T, D, G
Potential Hazards	T, D, G	T, D, G	T, D, G	T, D, G
ROW Encroachments	T		T	

*Note: Letters denote type of pipeline: **T** is transmission, **D** is distribution, **G** is gathering.*

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6.2 Damage Prevention

6.2.1 Suspicious Activity

WTG's message communicates that the stakeholder should contact the 24-hour notification number in the event of a suspicious activity committed on the pipeline ROW.

6.2.2 Suspected Damage

WTG's message communicates that the stakeholder should contact the 24-hour notification number in the event of suspected damage to the pipeline and facilities of WTG.

6.3 Emergency Preparedness

WTG's message communicates the following:

- What to do if a pipeline is damaged or disturbed
- How to recognize a pipeline leak
- Potential hazards of the pipeline products
- What to do if a leak is suspected
- What not to do if a leak is suspected
- Pipeline operator's action during an emergency

6.3.1 Priority to Protect Life

Within the messages distributed to the stakeholders, WTG intends for the public to protect themselves by fleeing and not attempting to deal with the situation regarding WTG's facilities.

6.3.2 Emergency Contacts

The WTG Emergency Plan contains a list of all Emergency contact numbers for each individual WTG district. This document is revised annually to stay current. Included in all brochures, is an Operator Page, which includes all company specific Emergency Numbers.

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6.3.3 Liaison with Emergency Officials

WTG district level personnel will make contact annually (within 15 months of last meeting) with local emergency personnel on a face-to-face basis. The agenda of these meetings consists of: contact information, capabilities survey, location specific WTG emergency response plan, and information concerning the location of WTG facilities within the area of responsibility. This meeting(s) will be documented and include a signature from the emergency official.

6.3.4 Emergency Response Plans

WTG has a written emergency response plan for each specific operation area. An example can be found in [Appendix D](#) of this plan.

6.3.5 Emergency Drills and Exercises

WTG will support, develop, and participate in any requested emergency preparedness drill and exercise.

6.4 Integrity Management Programs (IMP)

WTG has an active integrity management program for all our Pipeline services (natural gas transmission, distribution, and liquids). WTG supports third-party public awareness meetings in the counties in which an HCA exists near our transmission pipelines; this includes face to face meetings with emergency responders and excavators. Ray Reed is the Director of Integrity Management, and his contact information is (806)358-1321 office, (620)271-3793 cell or rreed@westtexasgas.com email.

6.5 How to get Additional Information

Within the mail brochures contact information is provide for WTG. Additional details of pipelines and facilities can be obtained by contacting the WTG compliance /mapping department in Amarillo, TX. The mailing address is 8701 Strawberry Fields East Amarillo, TX 79119, by phone at (806)358-1321 or by email at wtgmapping@westtexasgas.com. Any additional information requested will have to be made in writing and approved by senior management prior to release.

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6.6 Leak/Damage Recognition and Response

Each stakeholder's audience message contains how to recognize a hazardous condition by using their senses (sight, hearing, smell). The message includes what the stakeholder should and should not do in the event of an emergency.

6.7 NPMS

WTG supports and has all the required transmission pipelines included in NPMS. This web site is updated by PHMSA annually, concurrent with the submission of annual reports to PHMSA and state agencies. Within the WTG message to transmission affected public and public officials, the NPMS message and web site address www.npms.phmsa.dot.gov is provided.

6.8 One Call Requirements

Within WTG's message to all stakeholders "One Call Center" information and process is stated. It also includes the 811 logo and message to call before you dig.

6.9 Pipeline Location Information

6.9.1 Pipeline Markers

Within WTG's brochures to all stakeholder's pipeline markers are discussed, and an example of pipeline markers is included within the brochure. Each WTG pipeline ROW is clearly defined with pipeline markers. Please note the pipeline markers are not intended to be used for manual locating of the pipeline during excavation activities. The pipeline markers are used only for approximate location of the pipeline.

6.9.2 Gathering and Distribution Pipeline Locations

Gathering and Distribution pipeline locations are considered proprietary information and not published for public use; however, on an as needed basis WTG will provide specifics upon approved requests. As always, line location will be completed upon pipeline locate requests / one call (811) requests.

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6.9.3 Pipeline Mapping

All pipelines within WTG are electronically mapped using a GIS mapping system. Natural Gas Transmission and Hazardous Liquid Transmission pipeline maps are uploaded to NPMS and available for public viewing at www.npms.phmsa.dot.gov.

6.10 Pipeline Purpose and Reliability

WTG's brochure to all stakeholders addresses the purpose of the pipeline industry and its safety record is clearly stated.

6.11 Potential Hazards

WTG's brochure to all stakeholders points out potential hazards of all pipeline operations.

6.12 Prevention Measures

WTG's message to all stakeholders describes all damage prevention measures for pipeline operations.

6.13 ROW Encroachment

WTG's message to transmission affected public and public official stakeholders discusses ROW encroachment.

Public Awareness Plan

Article 7 – Delivery Frequencies and Methods

7.1 Delivery Frequencies

WTG will follow the frequencies for message delivery found in API RP 1162 Baseline Program. This frequency is as following:

Transmission (Natural Gas & NGL):

<u>Stakeholder</u>	<u>Frequency</u>
Affected Public	Two (2) year interval
Emergency Officials	One (1) year interval
Public Officials	Three (3) year intervals
Excavators	One (1) year interval

Distribution (natural gas):

<u>Stakeholder</u>	<u>Frequency</u>
Affected Public (customers)	Twice annually or (1/2) semi-year interval
Affected Public (non-customers)	One (1) year interval
Emergency Officials	One (1) year interval
Public Officials	Three (3) year intervals
Excavators	One (1) year interval

Gathering (natural gas):

<u>Stakeholder</u>	<u>Frequency</u>
Affected Public	Two (2) year interval
Emergency Officials	One (1) year interval
Public Officials	Three (3) year intervals
Excavators	One (1) year interval

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7.2 Delivery Methods

WTG delivery methods are fourfold:

1. A third-party contractor completes a mass mailing of a detailed brochure for all stakeholder audiences.
 - a. WTG utilizes a third-party contractor to determine a reliable follow up process for any and all mail that is considered undeliverable or returned.
2. WTG completes annual face-to-face liaison with emergency responders.
3. WTG supports and participates annually in a third-party PAP presentation/meeting with emergency responders and excavators in counties that an HCA is near WTG pipelines/facilities.
4. WTG has posted PAP information (PAP objectives, general company information, map, damage prevention information, emergency contacts, etc.) within the company's web site. The address of this site is westtexasgas.com.

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Article 8 – Program Enhancements

8.1 Program Enhancements

During the annual review of the PAP, program enhancement consideration will be given to pipeline segments that contain an HCA, pipeline segments that contain Class 3 and Class 4 locations, distribution business districts, pipelines that traverses environmentally sensitive areas, specific areas with history of higher-than-normal third-party damage, etc.

Program enhancements that will be considered, but not limited to are:

1. Increased frequency for message delivery
2. Additional message content
3. Alternative delivery methods
4. Increased coverage area

Present enhancements to the baseline program consist of:

1. Counties in which an HCA is in proximity to WTG pipeline.
 - a. WTG uses third-party contractors to conduct additional presentation to Emergency Responder, Public Officials and Excavators.
2. During IM testing on transmission pipelines, door hangers are distributed to make the public aware of the testing.
3. During any construction or maintenance activity that could raise concern for the immediate public, written or face to face notification will be completed and documented (i.e., door hangers, public meetings, newspaper ads, personal contact, etc.).
4. Schools – WTG will meet annually with school officials that are within 1000 feet of the centerline of a WTG facility. This will include face to face meetings with specific details of the WTG facility, potential hazards, and emergency response actions.
5. Public Officials - WTG will meet annually with public officials that are within each asset county where WTG operates a pipeline facility. This will include face to face meetings with specific details of the WTG facility, potential hazards, and emergency response actions. Public officials are defined in this plan in Article 5.5.3.
6. 811 Message – All WTG company field personnel vehicles display 811 bumper stickers.

Public Awareness Plan

8.2 Program Implementation

- Program Annual Review/Management Written Report will be completed annually. The complete PAP will be thoroughly reviewed to ensure compliance with CFR §192.616, §195.440 and API RP 1162. The use of the PAP checklist completed during the annual managers meeting will be used to document (1) bounce back card information (2) third-party damage data (3) number of line locate requests, etc. This checklist is used to assist in the completion of this annual written report. This checklist can be found in [Appendix E](#). The findings of this review will be developed into a management written report. The PAP Administrator is responsible for conducting this review and developing the management written report. Review topics will consist of but not limited to: required changes to the PAP and the need for revisions, compliance of regulations, administration titles, names and/or duties, Program message, Program delivery method, Identified Assets, Stakeholder Audiences, External resources required for the upcoming year, and the need for additional program enhancements.
- The PAP Administrator will provide a written annual review of the PAP to management (Vice President of Operations, and Director of Compliance). At the conclusion of this meeting if approved, management will sign the plan for the upcoming year. These signatures provide management's support of the plan. Signature lines are found in Article 5.2
- Annually, liaison activities with district emergency responders will be conducted by local district personal (i.e., emergency responder capability survey forms, sign in sheet for local face to face meeting with emergency responders and public officials, local emergency response plans, etc.) will be completed.
- During the annual District/Division Manager meeting of each calendar year, the PAP Administrator will review the annual checklist for the Program. This checklist can be found in [Appendix E](#).
- A four-year PAP effectiveness evaluation of the plan prior to December 31, 2012, and at least once every four calendar years thereafter in keeping with the industry standards (i.e. June 20th, 2016, 2018, 2022 etc.) A written effectiveness evaluation report will be completed. Data and information supplied by this evaluation will be considered and used to assist in developing program enhancements (if needed) to the plan.

Public Awareness Plan

Article 9 – Evaluation

9.1 Pre-test Effectiveness of Materials

If, and when a significant revision is required to the PAP materials, a draft will be developed prior to implementation. A committee or a third-party contractor will be used to review the draft for content and effectiveness. If a committee is used, it will be made up of people/personal not associated with the development of the PAP. The committee or third-party contractor will develop a written conclusion to document their findings. Upon the conclusion from the pre-test, the required changes will be implemented.

9.2 Assess Program Implementation

During the annual District / Division Managers meeting, the PAP Administrator will conduct an annual review of the plan and with the assistance of the District / Division Managers.

On or prior to December 31, 2012, and at least once every four calendar years thereafter (i.e., 2016, 2018, 2022 etc.), the PAP administrator will complete a Public Awareness Evaluation of the plan. The Vice President of Operations, PAP Administrator and Director of Compliance will review the evaluation and make recommendations for improvement if needed.

In the event of a Regulatory Inspection, any area for improvement which is documented will have actions addressed in a timely manner. The PAP Administrator will have the responsibility to make the corrections to the plan and follow the process for change communicated within this plan.

Public Awareness Plan

9.3 Measure Program Effectiveness

Within the effectiveness measurement of the PAP, WTG measures three (3) specific areas, outreach (how many stakeholders were contacted and the response that was received), how well the message was comprehend by the stakeholders, and what results were achieved.

1. Outreach:

WTG utilizes a third-party contractor to provide data received via bounce back cards that are incorporated in the message that is sent to all stakeholders. This data is reviewed by the PAP administrator and if needed it will be incorporated into the revised PAP. The number of Stakeholders that were contacted can be reviewed in [Appendix E](#).

2. Comprehension:

WTG utilizes a third-party contractor to provide data received via bounce back cards that are incorporated in the message that is sent to all stakeholders. This data is reviewed by the PAP administrator and if any deficiencies are identified, changes will be incorporated into the revised PAP to address those area(s). WTG will measure the success of the message comprehension to the National and State average of peer companies within the same industry.

3. Achieving Results:

As a baseline WTG will track all third-party damages on all pipelines and will compare year end results to prior years. This report will include near misses; reported pipeline damages that did not result in a release of gas; and third-party excavation damage events that resulted in a release of gas. All information is relative to specific circumstances (e.g., more or less excavation activity within the time frame being reviewed). This information will be included in the PAP annual report to management.

Public Awareness Plan

9.4 Sample Size / Margin of Error

WTG utilizes reliable effectiveness data supplied by a third-party contractor. The sample size and margin of error is determined by the third-party contractor using standard statistical methods. Details will be provided upon request.

Public Awareness Plan

Article 10 – Documentation

10.1 Written Program Documentation

The annual checklist will be completed during the annual District / Division Managers meeting. This checklist will assist in the development of the written annual management's annual report.

The PAP administrator will complete a detailed Effectiveness Evaluation at least once every four years. The results of this evaluation will be used to assist in the development/improvement of the plan.

Liaison documentation, which includes but not limited to: emergency responder capability survey forms, sign in sheet for local face to face meeting with emergency responders, local emergency response plans, meeting scripts, etc. This documentation will be sent to the compliance department for review no later than September 1 annually.

PAP Administrator will complete a written annual review of the program and present it to management. This will be a high-level review of previous year's PAP. Management will demonstrate its approval by continued commitment to support the PAP by executing the statement of management commitment found in section 5.2 of this plan.

10.2 Other Documentation Records

WTG will document any additional Public Awareness Activities that are completed each year and can be found in their program files. Example of such activities includes IM testing notification, requested training from local Emergency Responders and supporting local awareness initiatives.

10.3 Record Retention

Copies of all PAP plans and revisions will be permanently retained. All other PAP documentation retention time is five (5) years. Prior to purging any PAP documentation, the PAP Administrator will be contacted, provide guidance and secure management approval prior to removal.

Public Awareness Plan

10.4 Management of Change (MOC)

West Texas Gas has developed an all-encompassing MOC process for all WTG Compliance plans. This process can be found in the WTG O&M in Section 5.4 Management of Change (MOC).

10.5 Documenting Changes to the Program

The PAP Administrator is responsible for documenting all changes to the WTG PAP

Public Awareness Plan

Appendix B: Affected Public, Emergency Officials, and Excavator Brochures

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

Appendix C: API RP 1162 Table 2-1

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

Appendix D: Public Emergency Responder Liaison Packet

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

Appendix E: PAP Annual Checklist

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

Appendix F: PAP Four Year Review

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