



DAKOTA GASIFICATION COMPANY PROCEDURE

Origination Date:	Procedure No.: 4321	Revision No.: 12
Affected Area(s): All	Originating Department: Protection Services	
	Final Approval: /s/ Dale Johnson	Date: 3/21/17
Procedure Description: CO2 Pipeline Emergency Response Plan (U.S. section)		

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I. PURPOSE

The purpose of the Emergency Response plan is to establish a set of guidelines to ensure the public safety in the event of a carbon dioxide pipeline emergency.

The CO₂ pipeline transports CO₂ containing up to 2% H₂S at 2700 psig from the Dakota Gasification Company Plant Site to a central receiving terminal near Goodwater, Saskatchewan. The CO₂ product transported by this pipeline will be a gas when released to the atmosphere, therefore this plan addresses an emergency response to a gas release due to line leak or rupture. Because of the gaseous nature of the product, emergency response to spills that may contaminate groundwater, rivers, lakes, pose a hazard to wildlife, or require extensive cleanup have not been included in this plan.

II. SCOPE

This Emergency Response Plan (ERP), in its entirety is intended to provide the necessary information for pre-emergency planning as well as a step-by-step procedure to be used during an emergency. This plan encompasses the portion of the carbon dioxide pipeline that originates at Dakota Gasification Company, northwest of Beulah, ND and terminates northwest of Noonan, ND at the U.S./Canadian border.

III. REFERENCES

- DGC Procedure No. 4310 - DGC Plant Emergency Plan
- DGC Procedure No. 024 Emergency Planning and Response
- DGC Procedure No. 323 – Electrical Utility Notification
- DGC Procedure No. 30-210 – R911 Computerized System Procedure
- 74-001 Federal Requirements for Reporting Pipeline Accidents
- 74-002 Federal Requirements for Reporting Carbon Dioxide Pipeline
- 74-018 Response to Abnormal Operating Conditions
- 49 CFR Part 195.402E
- 49 CFR Part 1910.120
- 590-06-EM Pipeline Abnormal

IV. DEFINITIONS

Class I Pipeline Emergency Response: A two-man crew dispatched from the plant site as quickly as possible. The Class I responders shall be Operator Qualified Pipeline Emergency Response Technicians.

Class II Pipeline Emergency Response: Includes Class I plus three additional Operator Qualified Pipeline Emergency Response Technicians for entry into the hot zone.

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Class III Pipeline Emergency Response: Includes class I and II plus all available Operator Qualified Pipeline Emergency Response Technicians.

Class IV Pipeline Emergency Response: Includes class I, II, and III with additional support staff on-scene for incident management and unified command

Controller: Those persons (board operator) that monitor SCADA data from the control rooms and have operational authority and accountability for the remote operational functions of the pipeline facility.

Dakota Gasification Company: (DGC); Coal gasification plant owned and operated by Dakota Gasification Company. Located northwest of Beulah, ND. Produces, compresses, and exports CO₂ to the pipeline.

DGC Protection Services Control Center (PSCC): On-site Emergency Operations center that will receive first notification of an emergency, will initiate additional notifications, and will serve as the incident command center for emergency planning and response.

Emergency out-calling System: The emergency “out call” system is designed to notify those residents living or working within the pipeline corridor that a pipeline emergency has occurred with the potential to affect them. In Canada the pipeline corridor is two kilometers in width on each side of the pipeline or four kilometers total, while in the United States the pipeline corridor is two miles in width, one mile on either side of the pipeline. The population density in this corridor is surveyed and the information updated every year.

When a pipeline emergency is declared, the emergency “out call” system may be initiated from Dakota Gasification Company for those residents on the affected pipeline segment(s). The computer driven system has four hundred dedicated phone lines which will deliver a recorded message alerting the resident of the pipeline emergency. It will take approximately one minute to complete these calls. Any unanswered calls will be repeated nine times at three-minute intervals. During the time between the retry intervals any additional residents in the affected area will be called.

The emergency “out call” system also has the capability of calling an alternate phone number if unable to reach a resident on the first try.

Each resident will be notified annually and asked if the current notification numbers are correct and if they wish to provide additional phone numbers.

Emergency Response Crew: A five man crew of hazardous material technicians dispatched from the plant site to assess the emergency, establish the hot zone, assist the first responders, and carry out an action plan to resolve the emergency situation.

EPA (Environmental Protection Agency) Level B Chemical Protection: A Level of personnel protective equipment that gives the wearer the maximum amount of respiratory protection and a medium level of skin protection. Level B equipment consists of a Self-Contained Breathing Apparatus, Chemical Resistant Clothing, Inner and Outer Chemical Resistant Gloves, and Chemical Resistant Safety boots.

ESD: Emergency Shut Down

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First Responder: Local/County fire rescue, medical, or Sheriff Department personnel dispatched to assist with emergency.

Hot Zone: Area around a pipeline leak with any concentration of H₂S gas and/or oxygen levels below 19.5% or greater than 23.5%. Hot Zone will be determined by the use of gas/air monitoring equipment.

Incident Commander: The individual responsible for directing and coordinating the overall emergency response.

Incident Command Center: The communication center set up to receive information from the emergency crew, as well as an assembly point to coordinate response activities and carry out risk assessment.

Incident Log: Log completed by Protection Services Control Center and Emergency Response Crew to log all activities during the emergency. Should include times, names of contacts, names of responders, and all activities performed during the emergency.

Mainline Valve: (MLV) Valves located along the pipeline route, can be remotely operated from DGC. There are 11 valves between DGC and the U.S. /Canadian border.

MIS: Management Information System

Pipeline Section: Refers to a section of pipeline between MLV sites. (Example: section 1 refers to the section from DGC to MLV #1, section 2 refers to the section from MLV #1 to MLV #2) Pipeline starts after 8th stage flange of CO2 compressors.

Pipeline Emergency: unplanned gas release or pipeline failure that may pose a risk to the public or the environment.

Qualified: An individual that has been evaluated, can perform assigned covered tasks, recognize and react appropriately to abnormal operating conditions.

Safety Officer: The Safety Officer assesses hazardous and unsafe situations and develops measures for assuring personnel safety at the incident. The Safety Officer must be trained to the hazardous materials technician level and reports directly to the incident commander.

Span of Control: The maximum number of non-qualified individuals that a qualified individual can direct and observe performing a covered task.

SVPL: Souris Valley Pipeline Limited

V. RESPONSIBILITIES

Protection Services in collaboration with the Shift Superintendent, Pipeline Controllers and Operations and emergency response operator qualified personnel are responsible for the implementation, training, and review of this emergency response plan.

Review of this emergency plan shall occur at intervals not to exceed 15 months, but at least once each calendar year.

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VI. INSTRUCTIONS

A. Emergency Response Quick Reference Flow Chart

STEP 1

Pipeline emergency reported to DGC Protection Services Control Center (PSCC).

- ◆ All pertinent information is recorded on “RECORD OF EMERGENCY NOTIFICATION PLR-E-1” (Form DGC 0342).
- ◆ PSCC starts the “INCIDENT LOG PLR-E-2 (Form DGC 0343).
- ◆ PSCC notifies Shift Superintendent of the pipeline emergency.
- ◆ PSCC establishes INCIDENT COMMAND CENTER.

STEP 2

Shift Superintendent assumes role of Incident Commander and moves to the PSCC, Incident Commander declares a CO2 pipeline emergency and directs the following responses.

- ◆ Informs Oxygen Plant Controllers that an emergency is in progress. The qualified Controller has the responsibility and authority to mitigate the effects of the condition by taking extreme measures such as shutting down all or part of the pipeline, utilizing the flare system, curtailing product transfer, or the operation of remote valves if they believe that continuing to run the pipeline could result in a hazard to the public or the environment.
- ◆ Incident Commander contacts local emergency response agency by (live) telephone informing them of the current situation and establish a line of communication.
- ◆ PSCC to initiate “out call” phone system for affected pipeline sections and agencies.
- ◆ PSCC to notify Pipeline Operator Qualified Superintendent, Supervisor and Operator Qualified pipeline Technicians.
- ◆ PSCC to notify SVPL Representative.
- ◆ PSCC to notify DGC Management.
- ◆ Qualified Superintendent directs (unqualified superintendent advises) O2 Plant Supervision to initiate ESD of the pipeline by closing MLV’s to isolate affected pipeline sections and shutdown Tioga Booster.
- ◆ Shift Superintendent to notify Office of Pipeline Safety.
- ◆ Shift Superintendent to notify North Dakota Public Service Commission.
- ◆ MIS Technician to notify Cenovus and Apache Representative.

STEP 3

Class I response: Incident Commander dispatches 1st Emergency Response Crew as quickly as possible. The crew consisting of two Operator Qualified Pipeline Emergency Response Technicians to the incident site.

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- ◆ Emergency Crew will not enter the “hot zone” without a second backup emergency crew and Safety Officer on site.
- ◆ O2 Plant qualified Controller confirms ESD of CO2 pipeline and monitors all communication with the emergency crew via radio or telephone.
- ◆ Operator Qualified Supervisor or Operator Qualified Controller confirms MLV site valve closure in the field at location of emergency. (Field verification of ESD)
- ◆ PSCC confirms “out call” system notifications were completed and Management contacts have been made.
- ◆ PSCC confirms SVPL Representative has been contacted.

Class II response: Incident Commander dispatches 2nd Emergency Response Crew consisting of three Operator Qualified Pipeline Emergency Response Technicians.

STEP 4

1st Emergency Response Crew arrives at incident site and initiates on scene response.

- ◆ Open continuous communication with PSCC and pipeline controllers.
- ◆ Determine if there are injured people requiring immediate rescue.
- ◆ Request medical assistance for any injured people.
- ◆ Determine exact location of the incident.
- ◆ Determine wind speed and direction.
- ◆ Establish initial “hot zone” and monitor for changes in size, boundary or direction.
- ◆ Restrict access to incident site, keep spectators and traffic away.
- ◆ Standby to assist First Responders.
- ◆ Assess the need for additional emergency crews or additional resources.

STEP 5

Incident Commander performs risk assessment based on information from 1st Emergency Response Crew.

- ◆ Determine if there are receptors, population centers or public facilities at risk.
- ◆ Determine if involved receptors should be evacuated or Shelter-In-Place.
- ◆ Determine if an environmentally sensitive area is at risk.
- ◆ Determine if it is necessary to vent down the pipeline at a lower risk location.
- ◆ Determine if additional qualified personnel and support staff (class II & IV response) are needed.

Incident Commander directs the following responses to mitigate the emergency:

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- ◆ Utilizing population density maps directs 1st Emergency Crew to assist in evacuation of receptors in the risk area as soon as the 2nd emergency Crew is on site to act as backup.
- ◆ Directs First Responders to the incident site to assist in evacuation, care and treatment of the injured and restrict access to the incident site.
- ◆ Directs PSCC to initiate the second “out call” message with specific evacuation or Shelter-In-Place data for the affected receptors.

STEP 6

1st & 2nd Emergency Crews confirm that all receptor locations in the risk area have been checked and the residents successfully evacuated.

STEP 7

1st Emergency Crew remains at the incident site to assist the First Responders.

2nd Emergency Crew proceeds with blowing down the pipeline at a safe location.

STEP 8

1st & 2nd Emergency Crews determine pipeline has vented to the atmospheric pressure and no longer provides a hazard to the public, this information is relayed to the Incident Commander.

STEP 9

Incident Commander informs the First Responders that an emergency condition no longer exists.

STEP 10

1st & 2nd Emergency Crews prepare a detailed Emergency Response report, make sure the incident site is barricaded to prevent injury to persons or livestock and maintain a 24hr surveillance of the incident site until relieved.

STEP 11

After emergency is resolved the Incident Commander will hold a Critique and Debriefing with all affected personnel involved with the incident.

VII. EMERGENCY RESPONSE PROCEDURE

A. Initial Notification of a Pipeline Emergency.

1. This notification may be received by DGC Protection Services Control Center (PSCC) from the public, fire/police/sheriff departments, or pipeline operator.
2. Notification may also be received from the Oxygen Plant Control Room based on information provided by the leak detection system.

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3. Upon notification of a pipeline emergency, personnel stationed at the DGC Protection Services control center will record the information on PLR-E-1, "Record of Emergency Notification" (DGC 0342). All information must be recorded in as much detail as possible.
- B. PSCC Reports to Shift Superintendent.**
1. Based on the information provided by PSCC or the leak detection system, the Qualified Shift Superintendent will determine if an emergency response is required, see decision matrix on page 2 of PLR-E-1, "Record of Emergency Notification". If an emergency response is required, the Shift Superintendent will assume the role of Incident Commander and direct the following responses:
 - a) Notify Gas Processing & Oxygen Plant Supervision a CO2 pipeline emergency is in progress and to route all CO2 to the boilers. The qualified controller has authority to shut down the pipeline if they believe that continuing to run the pipeline could result in a hazard to the public or the environment.
 - b) Notify Oxygen Plant to initiate an ESD of the pipeline by closing MLV's. To isolate affected pipeline sections. Once all MLV valve positions indicate closed this information should be immediately relayed to the Incident Commander.
 - c) PSCC to establish an Incident Command Center.
 - d) PSCC to initiate the first out-call session for the receptors in the affected pipeline section. This call will broadcast a pre-recorded message warning that a pipeline emergency has occurred that may affect the tenants/ landowners in the area and are advised to evacuate or Shelter-In-Place. (Receptor lists divided by pipeline section are provided with this plan).
 - e) PSCC to initiate the second automated out call session for the agencies in the affected section of the pipeline. This call will broadcast a pre-recorded message warning that a pipeline emergency has occurred that may affect residents in their district.
 - f) PSCC to notify Pipeline Superintendent, Supervisors, and Technicians.
 - g) PSCC to notify SVPL Representative.
 - h) PSCC to notify DGC Plant Management.
 - i) Shift Superintendent to notify Office of Pipeline Safety.
 - j) Shift Superintendent to notify North Dakota Public Service Commission.
 - k) Shift Superintendent to notify the DOT National Response Center Office of Pipeline Safety within the first hour of the incident.
 - l) MIS technician will notify Cenovus and Apache of interruption in CO2 flow.
- C. Incident Command Center Established.**

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1. PSCC will establish itself as the Incident Command Center, and will be staffed as needed and will begin an incident log, which will include times, names of responders, and all other activity associated with the emergency response. PLR-E-2 (DGC 0343) can be used for this purpose.
 2. The Incident Command Center will also be used as an assembly point for the Incident Commander. A workspace with tables suitable for review of drawings and maps will be provided as needed to perform the risk assessment. At least two phones should be available and staffed by Protection Services personnel to coordinate activities with the emergency crews and First Responders.
- D. Emergency Crew Dispatched to Site (class I response).
1. A two-man crew will be dispatched from the plant site as quickly as possible. The first emergency crew will consist of Operator Qualified Pipeline Emergency Response Technicians. Additional emergency crews should be dispatched as soon as they are available. Prior to leaving site, the response vehicle must have personal protective equipment and toxic gas monitors. Refer to item "V" of the Attachment Section of this plan for a detailed list of the required equipment. (Located in the back of book). To ensure shortest possible response time, maps as well as instructions for access to the mainline valve sites are included in Section IX of this plan.
 2. Before leaving Plant site, the crew will make the following notifications:
 - a) Notify Shift Superintendent.
 - b) Fill in sign out log sheet at PSCC naming each person in the crew and the suspected destination.
 - c) Leave cell phone number with PSCC, and establish a call back time.
- E. First Emergency Crew Arrives at Site.
1. The first emergency crew approaching the incident site should follow these guidelines:
 - a) Establish continuous communication with PSCC personnel, if communication is lost, do not approach site, and move to a position where communication can be re-established.
 - b) Have all multi gas monitoring equipment in operation in the vehicle before approaching the incident site to avoid driving into the hot zone without being aware of it.
 - c) Approach the suspected incident site from an upwind direction.
 - d) Make visual observation of area looking for casualties and trying to locate the incident site.
 - e) Park vehicle a safe distance away from, and upwind of incident site.

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2. Upon arrival at site, the first emergency crew will assess the situation and report back to PSCC with the following information:
 - a) Exact location and severity of emergency.
 - b) Any known injuries, request additional medical staff as needed.
 - c) Any immediate danger to a population center.
 - d) Wind direction and best approach route.
 - e) Evacuation route.
 - f) What additional emergency support is required?
3. Based on the above information, the Incident Commander will:
 - a) Perform a risk assessment to determine if:
 - (1) A public facility, population center, or gathering area is at risk.
 - (2) An environmentally sensitive area is at risk.
 - b) Direct PSCC to contact and dispatch local and county First Responders using the contact list provided in Attachment B of this plan, and provide them with the location of the incident site and specific directions on how to approach, what roads to restrict access and any casualties requiring medical attention.
 - c) Incident Commander will dispatch another emergency crew from the plant site as soon as qualified personnel and emergency equipment is available. Five Operator Qualified Pipeline Emergency Response Technicians will be the minimum required for entering the hot zone. This is accomplished by the first emergency crew, consisting of two hazmat technicians entering the hot zone wearing EPA level B chemical protection. While the second crew consisting of two Operator Qualified Pipeline Emergency Response Technicians are on standby also wearing EPA level B chemical protection to perform rescue if problems are encountered. The fifth technician is designated as the safety officer and will oversee the entry operations.
 - d) PSCC will print a data log from the R911 out bound calling on the sessions that they launched. All operator intercepts and unanswered calls from the data log will be manually called. Any answered calls from this list will be given the evacuation or Shelter-In-Place message.
4. The first emergency crew at the site will:
 - a) First isolate the incident in all directions a minimum of 1000 feet. This will be the initial hot zone. A more defined hot zone will be established with gas monitoring equipment when the second emergency crew arrives on site.
 - b) Protect person down wind.
 - c) Restrict access to the site.

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- d) Keep spectators and traffic away.
 - e) Remain at site to assist first responders.
- F. First Responders Arrive at Site.
1. The First Responders primary goal will be to protect the public. This will be accomplished by:
 - a) Blocking/barricading roads to restrict access to emergency site. Restrict access to hot zone. First Responders are advised NOT to enter hot zone.
 - b) Evacuate tenants/landowners in the affected area.
 - c) Provide medical attention for the injured.
- G. Additional Emergency Crews Dispatched (class II response).
1. Additional crew dispatched from DGC arrives at site to assist with evacuation.
 2. First emergency crew can establish a more defined hot zone with the use of multi gas monitoring equipment.
 - a) With a safety officer and a backup team in place. Two technicians dressed in EPA level B chemical protective clothing equipped with gas monitoring equipment and red flags or red cones can enter the site from the upwind direction. At the point where any H₂S gas is detected, mark the area with red flags. Survey the area upwind and cross wind of the pipeline leak, marking the hot zone where any trace of H₂S gas is present. The Emergency Response Guidebook recommends that during a large release, persons downwind of the release are protected at a minimum of 1.3 miles during daylight hours and a minimum of 3.9 miles at night.
 - b) Incident Commander should conduct an assessment to determine if additional qualified personnel and support staff (class III & IV response) are needed.
 - c) At this point the emergency crew can carry out the action plan that the Incident Commander has developed.
- H. Termination of Emergency.
1. The emergency response crews will determine when an emergency can be terminated, or declared "ALL-CLEAR" The criteria for making this determination will include:
 - a) All individuals have been evacuated from affected section.
 - b) The exact location of the leak resulting in an emergency has been identified, that portion of the pipeline has been adequately isolated, and product is no longer being released.
 - c) It is determined that the emergency does not pose a threat to the public or environment.

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2. Incident Commander will contact the First Responders and inform them of the status.
 3. After the emergency is resolved the Incident Commander will hold a Critique and Debriefing with all affected personnel involved in the incident. A written report will be generated and corrective action will be implemented where deficiencies are found.
- I. Required Reports and Notification of State and Government Agencies.
1. **PLR-E-1 Record of Emergency Notification (Form DGC 0342)** will be completed by DGC Protection Services Control Center at the time initial notification is made. The information on this form will be required to initiate an accurate response as well as providing details for any subsequent reports, which may be filed.
 2. The specialist at Protection Services Control Center as well as the emergency response crew in the field will complete **PLR-E-2 Incident Log (Form DGC-0343)**. This log will serve as a record of all activity involving the emergency response. This information will be used as a guide for completing and filing any subsequent accident / incident reports.
 3. **PHMSAF 7000-1 Accident Report-Hazardous Liquid Pipeline** To be completed and filed according to the guidelines in the procedure #74-001 Federal Requirements for Reporting Carbon Dioxide Pipeline Accidents.
 4. **National Energy Board in Canada requires a report any time flow is interrupted for an emergency.** This is to be sent to the Transportation Safety Board of Canada (TSB.)
 5. **Notification shall be made to the North Dakota Public Service Commission.**
- J. Statements to the News Media.
1. All “at-the-scene” statements to the media will be handled in accordance with DGC Plant Management recommendations at the time of the incident.
 2. All formal statements to the media will be generated by Basin Electric communications department.

VIII. PIPELINE OPERATIONS AND PLANT MANAGEMENT CONTACT LIST

- Pipeline Operations (Attachment A)
- Plant Management list (Attachment A)

IX. FIRST RESPONDERS AND EMERGENCY SERVICES CONTACT LIST

- First Responders and Emergency Services Contact List by Section (Attachment B)

X. MAPS AND MAINLINE VALVE SITE LOCATIONS

A. County Maps (Attachment C)

- Mercer County

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- Dunn County
- McKenzie County
- William County
- Divide County

B. Receptor Maps

- | | |
|------------------------------|-------------------------------|
| ➤ Map 1 of 14 (Attachment D) | ➤ Map 8 of 14 (Attachment K) |
| ➤ Map 2 of 14 (Attachment E) | ➤ Map 9 of 14 (Attachment L) |
| ➤ Map 3 of 14 (Attachment F) | ➤ Map 10 of 14 (Attachment M) |
| ➤ Map 4 of 14 (Attachment G) | ➤ Map 11 of 14 (Attachment N) |
| ➤ Map 5 of 14 (Attachment H) | ➤ Map 12 of 14 (Attachment O) |
| ➤ Map 6 of 14 (Attachment I) | ➤ Map 13 of 14 (Attachment P) |
| ➤ Map 7 of 14 (Attachment J) | ➤ Map 14 of 14 (Attachment Q) |

XI. RECEPTOR CONTACT LIST, SORTED BY PIPELINE SECTION

Receptor List

Lists names and phone numbers of receptors, sorted by receptor number, and used in conjunction with receptor maps.

- Receptor Contact List, Sorted by section (Attachment R)
- Receptor list (Attachment S)

XII. ATTACHMENTS

ATTACHMENT A	#4321 Attachment A - Pipeline Operations and Plant Management Contact List
ATTACHMENT B	#4321 Attachment B-First Responders and Emergency Services Contact List
ATTACHMENT C	CO2 Williams County (Attachment C) CO2 Divide County (Attachment C) CO2 McKenzie County (Attachment C) CO2 Mercer County (Attachment C) CO2 Dunn County (Attachment C)
ATTACHMENT D	CO2 Pipeline Receptor Map 1 of 14 (Attachment D)
ATTACHMENT E	CO2 Pipeline Receptor Map 2 of 14 (Attachment E)
ATTACHMENT F	CO2 Pipeline Receptor Map 3 of 14 (Attachment F)

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ATTACHMENT G	CO2 Pipeline Receptor Map 4 of 14 (Attachment G)
ATTACHMENT H	CO2 Pipeline Receptor Map 5 of 14 (Attachment H)
ATTACHMENT I	CO2 Pipeline Receptor Map 6 of 14 (Attachment I)
ATTACHMENT J	CO2 Pipeline Receptor Map 7 of 14 (Attachment J)
ATTACHMENT K	CO2 Pipeline Receptor Map 8 of 14 (Attachment K)
ATTACHMENT L	CO2 Pipeline Receptor Map 9 of 14 (Attachment L)
ATTACHMENT M	CO2 Pipeline Receptor Map 10 of 14 (Attachment M)
ATTACHMENT N	CO2 Pipeline Receptor Map 11 of 14 (Attachment N)
ATTACHMENT O	CO2 Pipeline Receptor Map 12 of 14 (Attachment O)
ATTACHMENT P	CO2 Pipeline Receptor Map 13 of 14 (Attachment P)
ATTACHMENT Q	CO2 Pipeline Receptor Map 14 of 14 (Attachment Q)
ATTACHMENT R	#4321 Attachment R Receptor List Sorted by Section
ATTACHMENT S	#4321 Attachment S Receptor List 102312
ATTACHMENT T	DGC 0342 - PLR-E1 Record of Emergency Notification
ATTACHMENT U	DGC 0343 - PLR-E2 Incident Log
ATTACHMENT V	Emergency Equipment List - PROTSEV073
ATTACHMENT W	Carbon Dioxide MSDS (REV 7)
ATTACHMENT X	#4321 Attachment X Mainline Valve Site Locations