

DRAFT

MIDWESTERN GAS TRANSMISSION COMPANY

EASTERN EXTENSION PROJECT

RESOURCE REPORT NO. 11

Reliability and Safety

April 21, 2005

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**RESOURCE REPORT 11
RELIABILITY AND SAFETY
SUMMARY OF FILING INFORMATION**

INFORMATION	SECTION
<p>Minimum Requirements to Avoid Rejection</p> <p><input type="checkbox"/> Describe how the project facilities would be designed, constructed, operated, and maintained to minimize potential hazard to the public from the failure of project components as a result of accidents or natural catastrophes. (§ 380.12(m))</p>	11.1 – 11.3

11.0 RELIABILITY AND SAFETY

11.1 INTRODUCTION

Transportation of natural gas by pipeline is one of the safest modes of transportation. All interstate natural gas pipeline facilities are designed, constructed, operated, and maintained in accordance with USDOT Standards (49 CFR Part 192). These minimum safety standards, together with recent advances in pipeline and compressor manufacture, construction, and inspection, minimize the potential for equipment failure and fire resulting from such failure.

11.2 SAFETY STANDARDS

The proposed aboveground facilities associated with MGT's Eastern Expansion Project will be designed and constructed, operated, and maintained to meet or exceed the requirements of USDOT Safety Standards in 49 CFR Part 192. These regulations are intended to ensure adequate protection for the public and to prevent natural gas pipeline and compressor incidents and failures. Part 192 specifies material selection and qualification; minimum design requirements; and protection from internal, external, and atmospheric corrosion.

Pipeline operating regulations are contained in Subpart L, Part 192. Section 192.615 requires each pipeline operator to establish an operation and maintenance plan and an emergency plan that includes procedures to minimize the hazards in a natural gas pipeline emergency. Key elements of the plans include procedures for:

- receiving, identifying, and classifying emergency events - gas leakage, fires, explosions, and natural disasters;
- establishing and maintaining communication with local fire, police, and public officials and coordinating emergency response;
- Prompt and effective response to emergencies
- ensuring that properly trained personnel, as well as necessary equipment, tools, and materials available at the scene of an emergency;
- protecting lives first and then property;
- making safe any actual or potential hazard to life or property; and,
- emergency shutdown of system and safe restoration of service.

In addition, pipeline operating regulations contained in Subparts L and M, Part 192 require operators to establish public awareness and damage prevention programs and to perform regular pipeline patrols, leak surveys, pipeline marking and other surveillance activities to promote pipeline safety.

MGT's operation plan will be implemented during operation of the proposed facilities. MGT's plan meets or exceeds all applicable USDOT regulations.

11.3 MGT PIPELINE DAMAGE CONTROL PROGRAM

To further reduce the likelihood of a natural gas leakage or fire incident, MGT will modify its existing comprehensive operations and maintenance program for existing facilities to include the

proposed facilities. The purpose of this program is to prevent operational incidents and to effectively respond to any incident that may occur.

MGT's operations and maintenance program includes corrosion control, leak inspection surveys, and regularly scheduled aerial and ground patrols of the pipeline right-of-way. MGT participates in all existing one-call systems. MGT representatives and contract inspection staff will supervise the construction sites and mark the location of MGT's underground facilities.

11.3.1 Emergency Response Capabilities

MGT maintains 24-hour emergency response capabilities, including a toll free emergency only phone number. The number is included in informational mail-outs, posted on all pipeline markers, and provided to local emergency agencies in the vicinity of the pipeline.

MGT's operating personnel are trained in detection of natural gas, emergency shutdown procedures, and blow-off procedures to reduce line pressure in the event of an emergency. Each mainline valve installed on the pipeline is equipped with automatic actuators, some of which may be monitored and controlled remotely from the central control facility. However, operations personnel would also be able to close valves manually to stop the flow of gas.

MGT representatives have met previously with the emergency services departments of the municipalities and counties where existing facilities are located. Additional and new contacts will be made by MGT representatives to ensure all emergency service departments are aware the proposed pipeline and related appurtenances are located within their service areas. Fire and safety equipment is maintained along the pipeline system, and MGT personnel and local emergency response groups are trained in response procedures. MGT provides these departments with the 24-hour emergency numbers and verbal, written, and mapping descriptions of the pipeline system. MGT representatives meet with all local emergency service units on an on-going basis.