OVERLAND PASS PIPELINE PROJECT

EMERGENCY RESPONSE PLAN

DRAFT

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LIST OF ATTACHMENTS

1.0 PURPOSE AND SCOPE

The purpose of this Emergency Response Plan (ERP) is to identify Overland Pass Pipeline Company LLC's (Overland Pass') emergency personnel and the logical sequence of actions that should be taken in the event of an emergency involving the Overland Pass system facilities during construction of the Overland Pass Pipeline Project. Once the pipeline is constructed and pipeline operations commence, Overland Pass will re-define its organizational management structure. The ERP will then be amended so that it meets the requirements of the Minimum Federal Safety Standards, Title 49 CFR Part 195.403, Transportation of Hazardous Liquids by Pipeline.

This version of the ERP begins to establish written emergency shut down procedures, communication coordination, and clean-up responsibility to minimize hazards resulting from a gas pipeline emergency, such as liquid leaks, explosions, and fires. Hazards associated with both pipeline construction and operations such as natural disasters have been addressed in this plan.

2.0 EMERGENCY RESPONSE TEAM

The Overland Pass Emergency Response Team (ERT) will report through the normal, internal management chain-of-command. Due to the diverse locations, differing state and county jurisdictions, and variety of field activities involved in Overland Pass pipeline construction and operations, establishment of more than one ERT may be necessary. Under all circumstances, prompt and proper treatment of the injured or ill employee is of utmost importance.

2.1 Emergency Response Team During Construction

The following organizational chart gives the titles, functions, and reporting relationship that will be used during construction. Although not specifically listed on the organization chart, Overland Pass will appoint a Spill Coordinator for each construction spread, who will also be part of the ERT. A conceptual list of emergency contacts to be used during pipeline operations is also provided:

2.1.1 Incident Notification Emergency Contact List

Prior to construction, Overland Pass will establish the ERT that may include some or all of the positions outlined in the above organization chart. The list below will be expanded as appropriate for each of the five construction spreads (missing contact information to be provided prior to construction).

MAJOR INCIDENTS – 24 hrs/day, everyday: 911

MINOR INCIDENTS – 7 a.m. to 7 p.m. Mountain Time, every day:

Construction Manager:

Engineering Project Manager:

Contractor Safety Manager:

Contractor Safety Director:

Construction Supervisor:

Right-of-way/ Permit Coordinator

Regulatory and Community Outreach Manager:

EHS Advisor:

Community Relations Manager:

Contractor Safety Coordinator:

Overland Pass Safety Inspectors:

Overland Pass Environmental Lead Environmental Inspectors:

Overland Pass Spill Coordinator:

Contact information for federal, state, and county emergency contact information, helicopter emergency response, spill reporting, and hospitals closest to the pipeline route are located in attachment A of this ERP.

2.1.2 Emergency Medical Care

In the event that during construction, a personal injury necessitates the dispatch of the helicopter "flight-for-life", it is anticipated that the right-of-way width and activities will be able to accommodate the safe landing and take-off. The surveyors, inspectors, and/or right-of-way supervisors would assist with providing GIS coordinates (maintain a list) so that the air ambulance service could efficiently locate the emergency situation. The right-of-way will be graded so that heavy equipment used for trenching, pipe laying, backfill and restoration can travel safely. The travel lanes will be approximately 50 feet wide on the working side. In addition to the construction right-of-way, Overland Pass will require the use of additional temporary workspace areas for wetland, waterbody, road, railroad, and foreign pipeline crossings; horizontal directional drilling entry and exit points; truck turn-around areas; areas of rocky soils, steep slopes, and rugged terrain; and staging areas and at the beginning and end of the project to tie the proposed new facilities into the existing facilities. Access roads will also be available for helicopter landings.

2.2 Emergency Response Team During Operations

2.2.1 Incident Notification Emergency Contact List

Overland Pass will update the ERP with the names and phone numbers of the ERT. The list below will be expanded to correspond with each assigned geographical area:

Home Office Address and Telephone Number:	<TBD>
Operations Crisis Manager:	<TBD>
Environment Lead:	<TBD>
Health and Safety Advisor:	<TBD>
Operations Lead:	<TBD>
Logistics Lead:	<TBD>
Finance and Administration:	<TBD>
Legal:	<TBD>
Security:	<TBD>
Land:	<TBD>
Media Relations:	<TBD>

The Overland Pass home office shall establish an incident planning program so that physicians, medical consultants, hospitals, and ambulance services in the area can efficiently work together to respond in case of an emergency. The Overland Pass supervisors will insure that correct emergency phone numbers are posted in onsite construction trailers, and that the emergency phone numbers in the ERP are up-to-date and correct.

2.2.2 Emergency Medical Care

During operations, Overland Pass' Contractor will have sufficient space for helicopter landings of air ambulances at remote valve sites and at each of the three pump stations. Because approximately 320 miles of the pipeline route generally follows Interstate 80 through Wyoming, and the remaining route length is in the vicinity of Interstate 70 throughout Kansas, relatively easy access by emergency responders to this portion of the pipeline can be expected. Emergency Medical Technicians, or staff trained in first-aid, and first aid kits will be available at all remote work locations.

3.0 EMERGENCY COMMUNICATION PROCEDURES

There are four steps that are to be expected in responding to an emergency situation: The person receiving the call will be designated as the "First Responder." At the option of the First Responder, "911" may be called if deemed appropriate.

3.1 STEP 1: Incoming Calls to the First Responder

During pipeline construction, the emergency calls will most likely be generated by contractor or inspection personnel and will be received by a member of the ERT listed above in section 3.2.1. Each foreman, supervisor, or lead person on each phase of pipeline construction (clearing, grading, trenching, backfill, and restoration) will be equipped with a two-way radio, cellular telephone or both.

3.2 STEP 2: Classifying Incidents

The risks associated with construction are generally related to personal-injury. Emergencies associated with pipeline operations could include:

- personal injury;
- gas inside or near a building;
- fire near or involving a pipeline facility; and
- explosion near or involving pipeline facility.

The decision to reclassify the emergency level will be made only by the on-site Overland Pass managers or a senior Overland Pass representative. Emergency situations will be reclassified in consultation with the Overland Pass management and Incident Commanders (e.g., police, fire departments, sheriff).

3.3 STEP 3: Notifications

Overland Pass' management personnel will determine whether or not the incident is an emergency. If an emergency exists, the same individuals, in conjunction with the Operations Crisis Manager will determine the notification level.

Level 1: There is no potential danger to outside Overland Pass property or right-of-way, no threat to the public, and Overland Pass personnel can handle the situation. Notification to the Supervisors and other authorities should be timely.

Examples of Level 1 emergencies include:

- an oil, fluid, or fuel spill of any magnitude that is confined to the lease and does not flow onto private, state or federal property, or enter a stream, river, pond, dry drainage;
- an employee or contractor injury accident (either industrial or vehicular) resulting in minor injury that may require medical attention, but does not require hospitalization;
- minor property damage that does not compromise the safe operation of vehicles or equipment;
- a small natural liquid gas release which can be contained by manual valve closure or flaring;
- small brush or structure fire that has been contained within the right-of-way; and
- fatality of non-threatened or non-endangered species of wildlife within the right-of-way.

Level 2: The potential exists for the emergency to extend beyond Overland Pass' right-of-way.

Examples of Level 2 emergencies include:

- an oil, fluid, or fuel spill of any magnitude that leaves the lease and flows onto private, state or Federal property, or that may enter a stream, river, pond, or dry drainage;
- an employee or contractor injury accident (either industrial or vehicular) resulting in hospitalization;
- property damage resulting from fires, explosions, impact, or contacts that exceeds the safety threshold of the equipment or the structure;
- leak in a high-pressure natural gas liquids pipeline that cannot be controlled by a manual valve closure, but that does not represent an immediate danger to persons in the area;
- severe thunderstorm warning issued by the National Weather Service for an area where operating personnel are present; and
- fatality of a threatened or endangered species of wildlife within Overland Pass' right-of-way.

Level 3: Safe operating control has been lost, a fatality has occurred, the public safety is jeopardized, or there is a significant and ongoing environmental impact.

Examples of Level 3 emergencies include:

- an oil, fluid, or fuel spill of any magnitude that enters a watercourse and threatens the intake of a municipal or private water supply;
- any leak or spill (controlled or uncontrolled) that causes the evacuation of nearby residences, buildings or facilities, or causes significant environment damage;
- a fire, explosion, impact, or contact resulting in the destruction of Overland Pass property, injury to the general public and/or damage to private or public structures, or

fatality of a threatened or endangered species of wildlife outside Overland Pass property boundary;

- an employee or contractor injury accident (either industrial or vehicular) resulting in a human fatality;
- uncontrolled flow of flammable gas mixtures;
- rupture of a pipeline;
- report of a bomb threat; and
- tornado warning issued by the National Weather Service for an area where operating personnel are present.

Level 2 and 3 require notification of the Overland Pass management, who will then notify outside municipal services and the state regulatory agencies so that they may be kept informed of the situation. Immediate notification to the supervisor is mandatory.

3.4 STEP 4: Response

The Incident Commander (Overland Pass, and/or local emergency agency) is responsible for coordination of all on-site activities, emphasizing protecting people first, then environment, and finally property, including:

- securing the area;
- accounting for personnel and the public; and
- taking actions depending on the type of emergency.

Responders with appropriate training and fire suppression are authorized to assist in fire emergency response within the limits of their training and available equipment. Similarly, employees with appropriate training and spill response and cleanup are authorized to assist in an emergency response within the limits of their training and available equipment. The Incident Commander has the ultimate authority over how to dispatch Overland Pass employees to assist with an emergency response.

A level 2 or 3 emergency could cause a need for evacuation such as:

- fire;
- pipeline rupture;
- explosion;
- bomb threat; or
- tornado.

The Incident Commander or ERT member will make the decision as to whether or not an evacuation is necessary. The location of the site will depend on the type of emergency, its size, and its location. Safe refuge areas are typically off site and at an up-wind location. The Incident Commander will direct the evacuation of individuals if there is the potential risk to their health and/or safety.

The locations of safe sites/refuge areas will be posted in all Overland Pass facilities, and communicated via cell phone communication by the members of the ERT to non-team members. During visits to the

site, visitors will be instructed as to the emergency procedures, and are to remain with an escort or employee of Overland Pass at all times.

4.0 EMERGENCY PREPAREDNESS

Emergency preparedness is essential for effective emergency response. Essential elements include:

- Chain of Command;
- Resources;
- Training; and
- Public Education (Community Planning).

4.1 Chain of Command

The organizational structure outlined above in section 4 identifies the ERT; the role of Overland Pass management in classifying the incident as a Level 1, 2 or 3; and how members of the ERT will coordinate with and advise the management and Incident Commander.

The First Responder acts as the On-Site Commander until a member of the ERT, Incident Commander (fire rescue, police, sheriff, etc.), and/or a member of Overland Pass management arrives and gives direction to respond to the situation. If the event is determined to be an emergency, the First Responder may call "911."

The Incident Commander is usually the on-site emergency responder. Until the Incident Commander arrives, members of the ERT are responsible for securing the area, mobilizing the emergency response personnel, accounting for all personnel and members of the public, overseeing public and environmental protection, establishing and maintaining communications; and taking direction from the Incident Commander.

Any incidents which require an emergency response will be post-appraised and documented by the First Responder in conjunction with the Overland Pass ERT.

4.2 Resources

In preparing for emergency response, resource considerations should include standard medical kits, maps, and drawings of the facilities. During operation of the Overland Pass pipeline, each Overland Pass surface facility (pump station or valve system) shall have current and correct maps, plans, directions and diagrams depicting key safety elements and equipment located at each facility. Equipment operating manuals and shut-down procedures will be prominently displayed at key locations at each facility.

Resources that include environmental clean-up response contractors, testing laboratories, licensed disposal facilities, etc., will be included in the ERP once pipeline operations commence.

4.3 Training

Each contractor and inspection firm working on the construction of the Overland Pass pipeline will be required to be trained by Overland Pass in health and safety issues prior to coming onto the job site. In addition, daily safety meetings will be conducted both during construction and pipeline operation that will inform employees of the emergency response procedures, location of safe refuge areas, directions to medical facilities, emergency action plans, and the location of written documentation.

Prior to construction, contractor foremen shall attend Overland Pass-specific safety training that addresses familiarization with the terrain and environmental issues in the project area. The agenda for this specialized training may include:

- seasonal considerations, such as weather: cold and hot;
- geographical considerations: elevation and terrain;
- particularly sensitive habitats;
- travel considerations: helicopter, snowmobile, 4-wheeler, foot travel;
- clothing recommendations;
- wildlife: Bugs to Snakes;
- special interest species; sensitive/endangered;
- laws;
- spill prevention;
- first aid/CPR/AED;
- first aid kit familiarization;
- water;
- food;
- common illness/diseases;
- drug and alcohol issues;
- vehicle safety;
- emergency contacts;
- forest fires;
- what to do to increase your survivability;
- what to do to prevent forest fires;
- communications;
- sensitivity of local residents; and/or
- helicopter signal kit and knowledge of signaling.

During construction, field personnel will also be trained by Overland Pass in a variety of measures to make the job site safe including:

- When and how to notify all other contractors when actions or activities undertaken by them could affect health or safety of employees of other companies; to inform controlling contractor of all injuries to workers; and who/how to report to controlling contractor any unsafe conditions that come to their attention.
- If in the course of the work an employee could be exposed to hazardous chemicals, harmful physical agents or biological hazards, the location of material safety data sheets will be specified and made available for review.

- Personal protective equipment is expected to be worn that may include protective eyewear, gloves, hard hat, and footwear appropriate for the job site. Steel-toed footwear may be required on a project-specific basis.
- Assessing whether additional safety precautions (e.g., grounding straps for vehicles working near power lines) should be implemented as appropriate.

5.0 HAZARDS

The hazards associated with pipeline construction would typical of that on any construction site where heavy equipment is operated. Natural disasters are relevant to both pipeline construction and operation. Specific hazards and corresponding emergency response procedures are discussed further below.

5.1 Tornadoes and Other Severe Weather

Tornadoes are often accompanied by heavy rain, lightning and sometimes hail. Personal safety should be considered first, and care needs to be taken to avoid possible injury.

During thunderstorms when tornadoes are most likely to occur, personnel should tune into local radio and/or television stations for further updates. If a tornado WARNING is issued or if a tornado is visible, personnel should seek shelter immediately. However, do not try to outrun a tornado in a vehicle. If outside, go to the basement of a nearby sturdy building. If there is no adequate cover or shelter, go to a low area such as a gully, ditch, culvert, or low spot and lay flat. Avoid areas with trees. Do not remain in a vehicle or crawl under the vehicle. Low-lying areas can collect heavier-than-air gases, and flood water due to heavy rains. Precautions need to be taken when seeking protection in these low areas, and if necessary, move to another spot. If inside, go to a safe place such as interior hallways or bathrooms, or under a piece of sturdy furniture, a workbench, or heavy table to protect oneself from glass and other falling or flying objects. Stay away from windows and leave windows alone. Personnel should take shelter in places with more than one means of exit. Use arms and hands to protect head, face and eyes.

During severe weather such as blizzards, heavy snow, large hail, heavy rainstorm, ice storm, high winds and dust, etc., personnel should keep abreast of weather conditions by tuning into local radio and/or TV stations.

If the weather becomes severe enough to represent a hazard to the personnel, contact the appropriate ERT personnel for instructions. Personnel in outlying areas should attempt to contact the appropriate ERT personnel by cell phone or radio and notify them of the situation and your location. Agree to a time to re-establish contact following the storm to verify the safety of all personnel.

5.2 Lightning

During a lightning storm:

- Avoid being the tallest object;
- Don’t stand under or near a small grove of trees or a single tree;
- If caught in the open, move to low ground, but beware of flash flooding;
- Avoid using the telephone, except cell phones;
- Don’t stand by open windows or doors;
- If outdoors, get inside before the thunderstorm approaches; and

- If you feel your skin tingle or your hair stands on end, a lightning strike is imminent. Drop to your knees, bend forward, and touch your hands to your knees. Do not lie flat on the ground.

5.3 Bomb Threat Response Plan

Consider all bomb threats seriously. In the case of a threatening phone call:

- Listen carefully, stay calm, and be courteous. Keep the caller talking and have someone else contact the police (if possible);
- Record as much information as possible on the time, details, gender, accent, motive, attitude, etc.;
- Do not hang up the phone after the caller hangs up;
- Shut-in the facility;
- Evacuate all persons from the site; and
- Unlock all drawers, cabinets, and doors to allow search personnel access to all areas of the site.
- Discuss only with authorized personnel.

5.4 Fire

Several Fire Protection Districts may have jurisdiction over various portions of the Overland Pass pipeline system, depending on the location. In general, the best way to notify the Fire Department is to dial 911 and give the operator a very accurate description of the location of the fire and they will dispatch the correct fire department.

If the fire is in the incipient stage, the closest available trained employee should attempt to shut off the fuel source and extinguish the flames. This is to be done only if it can be done safely. If this does not appear to be possible, or jeopardizes the safety of the individual, the following action should be taken.

- Call 911 for the Fire Department or ambulance (if needed).
- Call appropriate ERT personnel and/or appropriate personnel identified in Site-Specific Safety or ERPs.

5.5 Terrorism

(language to be developed)

ATTACHMENT A

FEDERAL, STATE, AND LOCAL EMERGENCY CONTACT NUMBERS

AND

LOCATION INFORMATION FOR HOSPITALS CLOSE TO THE PIPELINE ROUTE

South Lincoln Medical Clinic

711 Onyx St, Kemmerer, WY 83101

307-877-4401

Memorial Hospital-Sweetwater

1200 College Dr, Rock Springs, WY 82901

307-362-3711

MEMORIAL Hospital-Carbon County

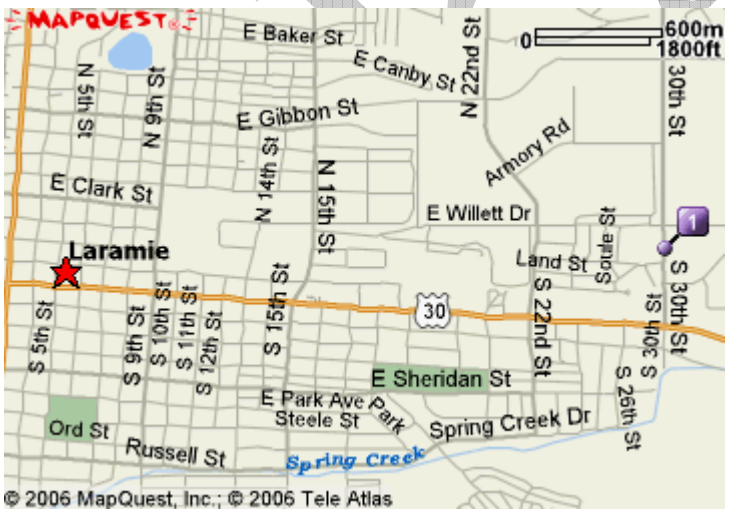
2221 Elm St, Rawlins, WY 82301

307-324-2221

Ivinson Memorial Hospital

255 N 30th St, Laramie, WY 82072

307-742-2141



United Medical Center

214 E 23rd St, Cheyenne, WY 82001

307-634-2273

Colorado Plains Medical Center

1000 Lincoln St, Fort Morgan, CO 80701

970-867-3391

Trego County Lemke Memorial Hospital

320 N 13th St, WaKeeney, KS 67672

785-743-2182

Hays Medical Center

2220 Canterbury Dr, Hays, KS 67601

785-623-5000