NorthWestern® Energy

&

Canada Montana Pipeline Company

(A Subsidiary of NorthWestern Energy)

Gas Transmission & Storage Emergency Procedures Manual

(United States and Canada Service Territories)

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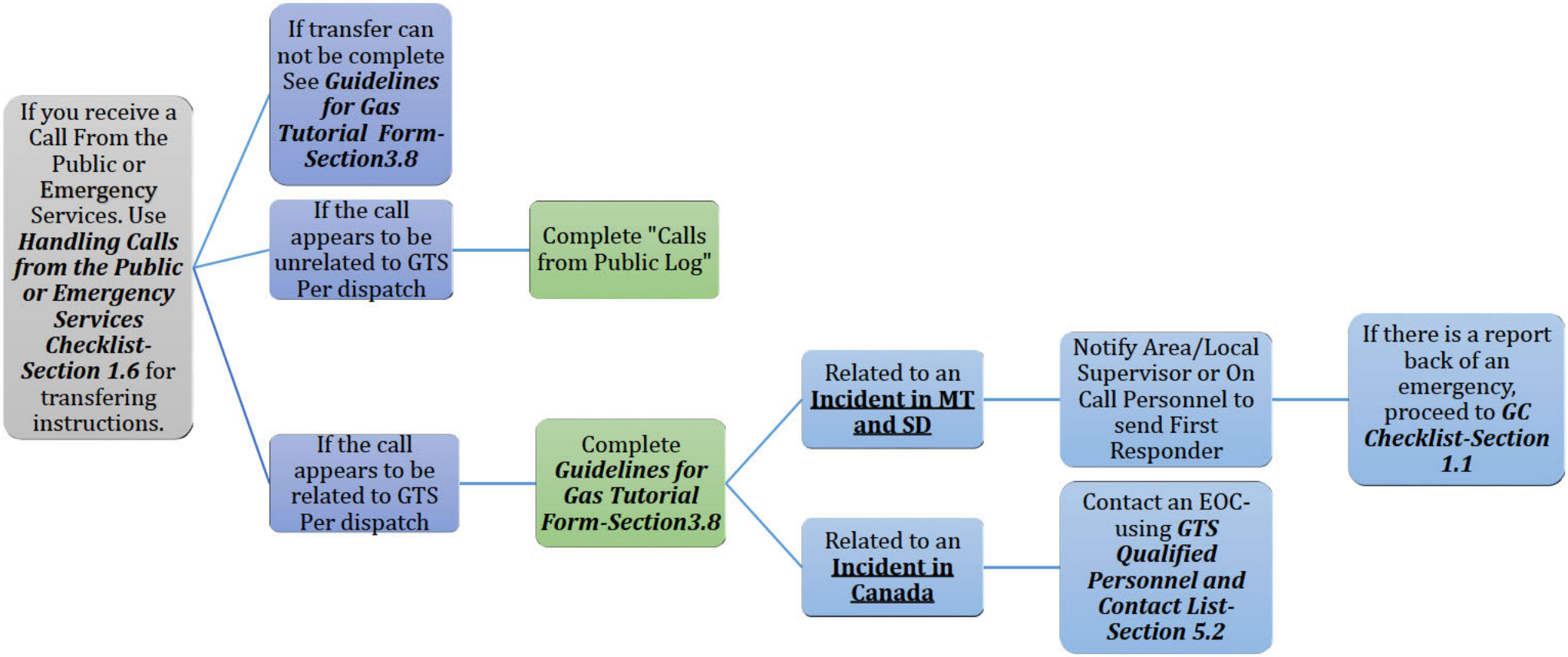
Year Color: Green

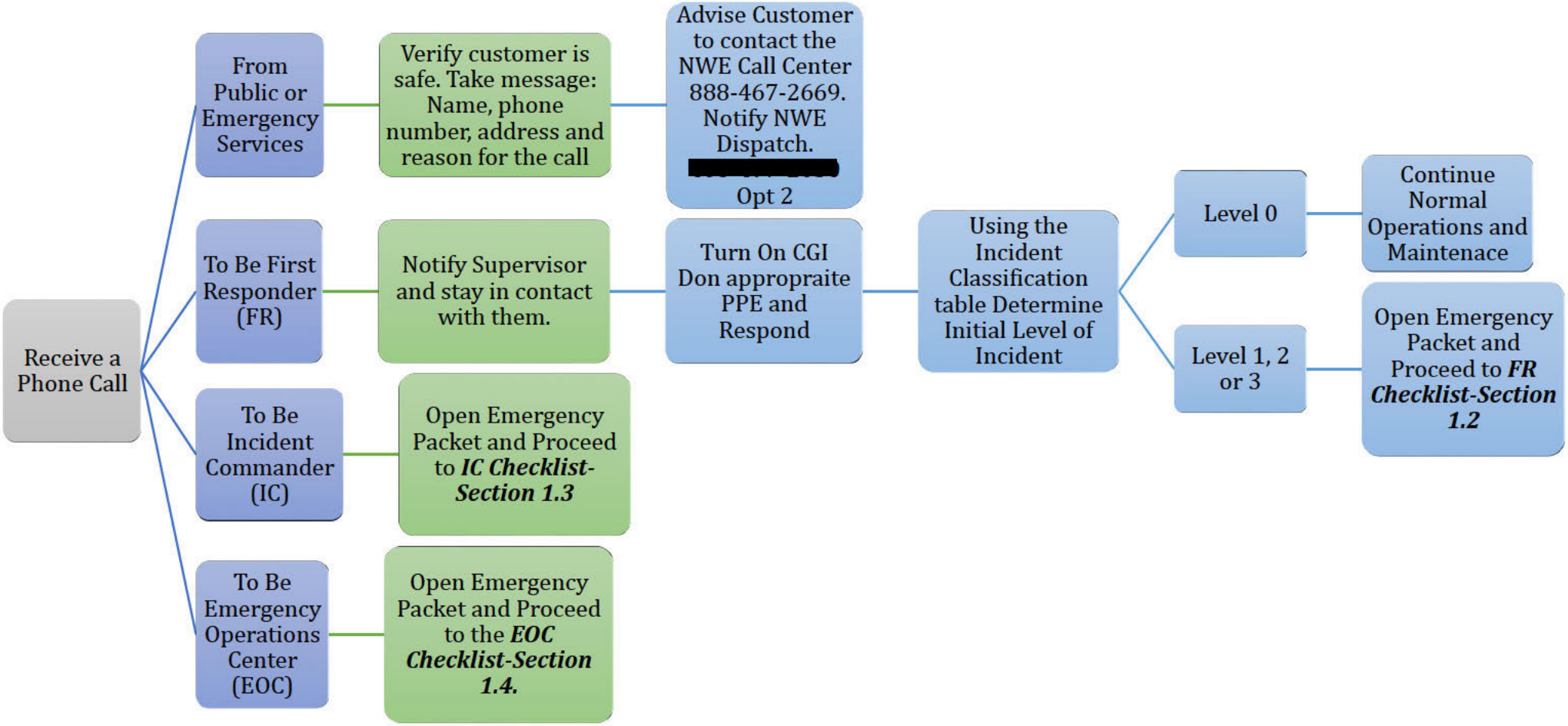
June 2024

Gas Control Initial Action Flow Chart



Phone Bridge for Emergency Use: [redacted]

Initial Action Flow Chart



Phone Bridge for Emergency Response Use: Dial [redacted]

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1.1 GAS CONTROL

✓	

Name: **Date:**

Primary Responsibilities

1. The protection of life – of both the service member and the customer.
2. To stabilize the incident – control or make the situation safe.
3. The conservation of property.

Protect and/or maintain Public Safety

- Continuously monitors and operates the Gas Transmission & Storage (GTS) system.
- Acts as hub for information and data on the GTS and compressor stations; utilizes field personnel at key sites, and the SCADA (Supervisory Control and Data Acquisition) system.

	INITIAL RESPONSE CHECKLIST
	Notify Area/Local Supervisor or On Call Personnel to send First Responder, if this has not been done already.
	Canadian Emergency: • Notify an EOC: ***GTS Qualified Personnel and Contact List-Section 5.2***. The Emergency Operations Center will **ALWAYS** be activated when an emergency occurs in Canada, regardless of the level of the emergency. • If no one is available, continue calling supervisors from the same list. • EOC will notify Canadian First Responders.
	Determine that 9-1-1 was called. If dialing 911 does not work See ***Civil Authorities Contact List-Section 5.1*** for Phone numbers by county.
	If assistance from a Division/District/Local Personnel is required use Notify Division /Districts of Gas Emergency Assistance in the ***Communication Procedures-Section 4.4***
	Begin filling out the electronic ***Abnormal Operating Conditions Form*** located in the Gas Operations SharePoint Site.
	Upon confirmation or suspected confirmation of an Emergency Situation begin to activate the Emergency Operation Center • See ***GTS Qualified Personnel and Contact List-Section5.2*** If no one is available, continue calling supervisors from the same list.
	Brief EOC on the situation. • Give the incoming Emergency Operations Center Commander the filled out form ***Handling Calls from the Public or Emergency Services*** (if applicable).
	Request EOC assistance with notifications and recording the response to the event, if needed. • Immediately begin a manual back up of all SCADA and relevant data points, if needed.
	Establish appropriate communications with interconnecting pipeline companies, if needed. • See ***Connected Pipelines Contact List*** located in the Gas Control Room.
	ONGOING CHECKLIST
	Continuously evaluate gas supply requirements and options in consultation with the Emergency operations Center and Gas Supply personnel. ***Refer to Control Room Management Section 3***
	Continuously monitor that the incident is NOT negatively affecting the normally occurring operations

	of the Gas Transmission & Storage System. ***Refer to Control Room Management Section 3.***
	Review Rupture Detection Procedure to evaluate and identify weather a notification of potential rupture is needed. ***Refer to Rupture Detection Procedure on the GC Share Point site***
	Begin filling out an ***Activity Log-Section 3.2***
	Electronic Versions of the Emergency Procedures Manual are located here: [redacted]
	SHIFT CHANGE CHECKLIST AND LOG
	Communicate shift change to the appropriate personnel.
	Fully debrief the incoming controller on the incident status and actions being taken.
	Record names along with date and time of the shift change.

	Outgoing Controller	Incoming Controller	Date	Time

	COMMUNICATION PLAN
	Establish Communications those needed i.e....FR, IC or EOC. • Radio and/or Cell Phone o What communications media is most effective for the Incident Team? o GTS Emergency Conference Bridge, Dial: [redacted] o If cell phone service is unavailable, a relay system may be set up from person to person and/or radio to radio and/or radio to Control Room.
	Communication to field resources shall be ran through IC or IC representative • Remind all involved of communications method decided upon o On site – communicate to Incident Command or IC representative only – no sidebars o In Butte – communicate to EOC command or EOC representative only – no sidebars
	If media is expected to be involved in anyway, contact IC and/or EOC.
	Record Conversations? • Contact Communications Group – [redacted]
	DEACTIVATION CHECKLIST
	Ensure all contacts made during the incident are aware of the status change.
	Assist with preparation of the After Action Report, if requested.
	Attend debrief session.

1.2 FIRST RESPONDER

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Name:	**Date:**

Primary Responsibilities

1. The protection of life – of both the service member and the customer.
2. To stabilize the incident – control or make the situation safe.
3. The conservation of property.

Protect and/or maintain Public Safety

- Act as the primary point of contact to assist field resources until the Incident Command (IC) is fully activated.
- Ensures notification of appropriate personnel at the onset of an emergency.
- Request extra radios, charging cables, CGI batteries, radio charging banks, etc. as applicable.

	INITIAL RESPONSE CHECKLIST
	Canadian Emergency Only: First Responder(s) **MUST** have and travel with – a company issued cell phone or a Verizon Wireless connected personal cell phone – for the response.
	Ensure personal safety: Never perform any actions outside of your qualifications. If you have not done so already, Turn on CGI • Don all necessary PPE • Ensure Combustible Gas Indicator (CGI) is turned on and calibrated during in a neutral atmosphere. • Stop work in the area • Eliminate any sources of ignition in a safe and prudent manner
	Perform an Immediate Hazard Assessment of the area before fully approaching the area. • This can be written or verbal and should be performed either in the vehicle or at an extremely safe distance from the potential Incident Site. • Determine safe access and egress routes
	Establish an initial isolation area at the Incident Site to protect others • Establish the potential gas envelope (10% LEL) • Begin filling out ***Atmospheric Monitoring-Section 3.5 and 3.6***
	Assess area or property for • Persons or injured persons involved in the incident. • Safely Evacuate the hazardous area and nearby buildings. • Keep to a safe distance. • Secure the area and restrict access to trained personnel only. • Assist injured persons within the capabilities of your training and if safe to do so. • If there are serious injuries or fatalities ask emergency services where the injured/casualties will be taken. Relay this information to the EOC.
	If possible and safe to do so verify that NorthWestern Energy assets are the cause of the actual emergency.
	First Responder is required to call and document 9-1-1 was called if there is • uncontrolled release of gas • gas is blowing, • Injury/death, fire • If evacuations are needed.

	Information needed: Callers Name: _____ Describe the Condition: _____ _____ Report the location: _____ Report the wind direction and estimated velocity: _____ If dialing 911 does not work See ***Civil Authorities Contacts-Section 5.1*** for Phone numbers by county.
	Respond to requests from Gas Control.
	Refer to ***Radio Instructions- Section 4.11 and 4.12*** if unfamiliar with the operation of NorthWestern Energy radios.
	Continue with atmospheric monitoring, make safe and take direction from unified command or supervision or NWE IC.
	If an Incident Command Post (ICP) has been established by emergency services (fire/police), establish appropriate authorities as Incident Commander or establish a Unified Command. Exchange information
	As assistance arrives: • Brief other responders on the situation and ensure that regular updates are provided. Establish a Tailboard using ***Tailboard Form for GTS-Section 3.4*** • Delegate functions as the situation develops • Maintain a list of responders who are within the Hazard Area by logging in the ***Emergency Response Sign-in Sheet-Section 3.3*** • Maintain the ***Activity Log-Section 3.2***
	Determine initial Level of Emergency using the ***Incident Classification Table-Section 4.1***
	Initial Level: | Date: | Time:
	Review and verify ***Emergency Response for Specific Incidents-Section 2*** to determine if there are any specific actions to be taken to address the current situation.
	COMMUNICATION PLAN
	Establish Communications those needed i.e….GC, IC or EOC. • Radio and/or Cell Phone o What communications media is most effective for the Incident Team? o GTS Emergency Conference Bridge, Dial: [redacted] o *If cell phone service is unavailable, a relay system may be set up from person to person and/or radio to radio and/or radio to Control Room.*
	Communication to field resources shall be ran through IC or IC representative • Remind all involved of communications method decided upon o On site – communicate to Incident Command or IC representative only – no sidebars o In Butte – communicate to EOC command or EOC representative only – no sidebars
	If media is expected to be involved in anyway, contact IC and/or EOC.
	Record Conversations? • Contact Communications Group – [redacted]

✓	1.3 INCIDENT COMMAND

Name:	Date:

Primary Responsibilities

1. The protection of life – of both the service member and the customer.
2. To stabilize the incident – control or make the situation safe.
3. The conservation of property.

Protect and/or maintain Public Safety

- Coordinates and manages response actions at the Incident Site.
- Ensures immediate public safety measures are taking place at the Incident Site.
- Determines tactical response, based on incident objectives.
- Communicates with Operations Manager or Emergency Operations Center (EOC).
- Bring extra radios, charging cables, CGI batteries, radio charging banks, etc.

	INITIAL RESPONSE CHECKLIST
	If first on site**, (and there is NO First Responder),** open the First Responder packet.
	Ensure personal safety: <u>Never</u> perform any actions outside of your qualifications. • Don all necessary PPE • Ensure Combustible Gas Indicator (CGI) is turned on and calibrated during in a neutral atmosphere. • Stop work in the area. • Eliminate any sources of ignition in a safe and prudent manner. • Refer to **Tools Material and Equipment List-Section 4.3**
	Receive briefing of current situation from person currently in charge Assume control of the Incident Site as **INCIDENT COMMANDER** Review/maintain the following: • ***Activity Log-Section 3.2*** • ***Sign in sheet-Section 3.3*** • ***Tailboard-Section 3.4***
	Establish a NorthWestern Energy Incident Command Post at a safe location on site (upwind). • Turn on Incident Commander Green light (if available) and obtain additional copies of the Gas Transmission & Storage Emergency Procedures Manual. • Designate a secondary ICP to be used if needed. • Determine a safe evacuation route from the incident site. • Communicate this evacuation route to all personnel arriving at the incident site. If an Incident Command Post (ICP) has been established by emergency services (fire/police), establish appropriate authorities as Incident Commander or establish a Unified Command. Exchange information.
	Ensure that the area or property has been evaluated for: • Persons or injured persons involved in the incident. • Safely Evacuate the hazardous area and nearby buildings. • Keep to a safe distance. • Secure the area and restrict access to trained personnel only. • Assist injured persons within the capabilities of your training and if safe to do so. • If there are serious injuries or fatalities ask emergency services where the injured/casualties will be taken. Relay this information to the EOC.

	Verify, if possible and safe to do so that NorthWestern Energy assets are the cause of the actual emergency.		
	As assistance arrives: • Brief other responders on the situation and ensure that regular updates are provided. • Review/update the Tailboard • Delegate functions as the situation develops • Maintain the Sign-in-Sheet to track those responders who are within the Hazard Area. • Review/update the Activity Log.		
	If resources are available assign a Scribe. The Scribe will assist with filling out documentation		
	Ensure the Level of the Emergency is still adequate using the ***Incident Classification Table-Section 4.1,*** if there are changes record them below.		
	Initial Level by first responder:		
	Change in Level:	Date:	Time:
	Change in Level:	Date:	Time:
	Establish contact with EOC Commander, if the EOC is activated. (This is a continuous item). Initiate appropriate control measures needed to manage the situation as per the Emergency Operations Center (EOC). If resources are available assign an employee to take photos of the Incident Site (only if safe to do so). Send the photos to the EOC as requested. Manage response activities at the site. Notify potential issues to the EOC and check their level of readiness.		
	Establish a tactical response to reach incident objectives based ion the following priorities; **P**eople, **E**nvironment, **A**ssets, **R**estoration Prepare ***Incident Action Plan-Section 3.1*** in consultation with other responding agencies and the EOC. Modify as required and update at the beginning of each operational period.		
	Review and verify ***Emergency Response for Specific Incidents-Section 2*** to determine if there are any specific actions that need to be taken to address the current situation.		
	COMMUNICATION PLAN		
	Establish Communications those needed i.e….GC, IC or EOC. • Radio and/or Cell Phone o What communications media is most effective for the Incident Team? o GTS Emergency Conference Bridge, Dial: [redacted] o If cell phone service is unavailable, a relay system may be set up from person to person and/or radio to radio and/or radio to Control Room.		
	Communication to field resources shall be ran through IC or IC representative • Remind all involved of communications method decided upon o On site – communicate to Incident Command or IC representative only – no sidebars o In Butte – communicate to EOC command or EOC representative only – no sidebars		
	If media is expected to be involved in anyway, contact IC and/or EOC.		
	Record Conversations? Contact Communications Group – [redacted]		

	SHIFT CHANGE CHECKLIST AND LOG			
	Communicate shift change to the appropriate personnel.			
	Fully debrief your relief on the incident status and actions being taken.			
	Record names along with date and time of the shift change.			
	Outgoing IC	**Incoming IC**	**Date**	**Time**

✓ 1.4 EMERGENCY OPERATIONS CENTER

Name:	Date:

Primary Responsibilities

1. The protection of life – of both the service member and the customer.
2. To stabilize the incident – control or make the situation safe.
3. The conservation of property.

Protect and/or maintain Public Safety

- Acts as authority for initial emergency response actions for transmission pipeline and storage related incidents.
- If necessary, activates Emergency Operations Center (EOC).
- Assumes the Command role of the EOC once it is activated.

INITIAL RESPONSE CHECKLIST

Verify with FR or IC initial Level of Emergency using the ***Incident Classification Table-Section 4.1***.

Assign a Scribe or note taker as soon as possible. The Scribe will assist with filling out documentation. Confirm if IC needs additional resources.

Canadian Emergency Only:

- Alert Cardston County Emergency Services:
- Emergency Services Dispatch: [redacted]
- Cardston County Emergency Services Authority [redacted]
- Remind Responder(s) they **MUST** have and travel with – a company issued cell phone or a Verizon Wireless connected personal cell phone – for the response.

In the event of an Emergency on the Carway Line determine if the Emergency Response Assistance Agreement with TCPL will be implemented.
If assistance is required by TCPL:

- CMPL may provide TCPL verbal notification by phone from EOC or CMPL gas control to TCPL gas control [redacted]
- Upon receiving the notice from CMPL, TCPL gas control upon their sole discretion will accept or decline the request. If accepted they will dispatch a TCPL first responder, subject to eventual relief by a TCPL Incident Commander.
- NWE resources (First Responder and Incident Commander) need to be dispatched if mutual aid is implemented
- TCPL first responder or TCPL Incident Commander maintains communication with one or both company's gas controls, as necessary.
- TCPL establishes and maintains command and control until relieved by an CMPL Incident Commander
- TCPL takes operational actions, primarily the closure of TCPL's on-site valve connecting the Wateron Montana Lateral and Carway Line via the Alberta Montana Sales Meter Station.
- Entire ***Emergency Response Assistance Agreement*** can be found in ***Section 4.20***

Initiate contact with the NorthWestern Energy Incident Command Post (ICP) and Incident Commander. Determine what means of communication should be used throughout the Emergency Response:

- Radios? *Dispatch a NorthWestern Energy Communications Technician to the Incident Site*
- Cell Phone? Conference Bridge, GTS Emergency Bridge ID [redacted]
- A combination of different methods?

	Use ***Handheld/Personal Radio Instructions-Sections 4.11*** if unfamiliar with the operation of NorthWestern Energy radios.
	Validate the requirements and authorize requests for valve closures from Gas Control or personnel on site. *check to see if any valves were deemed inoperable and if another valve has been named as a replacement.
	Activate the EOC if required. • Transition to the Commander role in the EOC.
	Begin filling out an ***Activity Log-Section 3.2***
	Determine the potential length of the Emergency Response. • Long term planning coordination may need to begin for extended response times (Emergencies lasting more than 18 hours).
	Begin using the ***Company Incident Command Structure-Section 4.5*** Coordinate recovery in conjunction with NorthWestern Energy Incident Commander.
	Direct First Responders to utilize cell phones to take pictures of the Incident Site (only if safe to do so) • Send the pictures to the Incident Commander and Emergency Operations Center. • If receiving assistance from an outside resource verify devices are calibrated and levels of LEL are known to account for discrepancies.
	Canadian Emergency Only: • Assess emergency to determine CER/TSB notifications. • Notifications must be made depending on circumstances. • For notification requirements see *Immediately Reportable Events* and their criteria located in the link below in Section 3.0: https://www.cer-rec.gc.ca/bts/ctrg/gnnb/rprtnggdlns/index-eng.html#s3_0 • TSB (CER is notified via the TSB): 1-819-997-7887 • CER Incident Form is locate here: https://apps.cer-rec.gc.ca/ers (The CER prefers a phone call first (via the TSB) followed by the online incident form) • For a Canadian Emergency: identify as the Canada Montana Pipeline Company. • Link for Canada GIS mapping https://gis.orrsc.com/Html5Viewer/index.html?viewer=Cardston_County_Public.Cardston_County
	• Review O&M 1040 section 10.0 for complete list of notification requirements. • Prepare to contact NRC (per O&M 1040), if required. • Reporting numbers are as follows: • NRC (PHMSA a is notified via the NRC): 1-800-424-8802 • Record NRC incident # _____
	Begin developing a Load Forecast Model to determine load needs. Ensure Gas Control is aware of this information.
	Assign personnel to determine Line Pack needs. This will be done in conjunction with the Engineering Department.
	ONGOING CHECKLIST
	Continue the development of the ***Incident Action Plan-Section 3.1*** • This may include one of the following: Bypass, Isolation, or allowing gas to blow. • See ***Emergency Shutdown Procedure and Schematics- Section 4.13***

	Maintain contact with the Incident Command Post and the Incident Commander. • Periodically review the Level of Emergency by using the ***Incident Classification Table-Section 4.1***
	Refer to appropriate section in ***Emergency Response for Specific Incidents-Section 2*** to determine any specific actions to be taken to address the current situation.
	Continually check ***Incident Reminders-Section 4.2*** in order to maintain continuity.
	Determine if the ***Drug and Alcohol Program-Sections 6.2*** need to be initiated.
	Determine if a job rotation list needs to be created to prevent fatigue.
	Determine if an Environmental or Spill Response is needed.
	Utilize the ***Emergency Response Contacts-Section 5.5*** • Contact Montana Energy Office (this is a courtesy call to the Montana Energy Office informing of a potential Energy Emergency and/or Government Emergency Declaration.) • Ensure external agencies, stakeholders, neighbors, Large Customers etc. are updated as required.
	COMMUNICATION PLAN
	Establish Communications those needed i.e….FR, IC or EOC. • Radio and/or Cell Phone o What communications media is most effective for the Incident Team? o GTS Emergency Conference Bridge, Dial: [redacted] o If cell phone service is unavailable, a relay system may be set up from person to person and/or radio to radio and/or radio to Control Room.
	Communication to field resources shall be ran through IC or IC representative • Remind all involved of communications method decided upon o On site – communicate to Incident Command or IC representative only – no sidebars o In Butte – communicate to EOC command or EOC representative only – no sidebars
	Record Conversations? • Contact Communications Group – [redacted]
	Release a statement to Gas Transmission & Storage personnel – *EOC duty* • Describe incident • Describe process including who is involved and to refrain from contacting incident team
	If media is expected to be involved in anyway, contact Corporate Communications using the 24-hour hotline number. See ***Emergency Response Contacts-Section 5.5***. A statement during a gas transmission emergency would be specific to the event - *EOC duty*. • Refer to the NorthWestern Energy Crisis Communication plan for more details: [redacted]
	Release an email to Major Events List – *EOC duty* • refer to O&M manual
	Monitor for effectiveness of communications and adjust as necessary – *EOC and IC duty*
	Verify EOC has started to contact customers, regulatory bodies, and stakeholders. ***Emergency Response Contact-Section 5.5***

	Develop Plan for Stand Down from the Incident • Release Statement to GTS personnel – *EOC duty* • Release an email to Major Events List – *EOC duty* • Contact Corporate Communications with summary of incident – *EOC duty* Contact all personnel involved – *EOC and IC duty*			
	SHIFT CHANGE CHECKLIST AND LOG			
	Communicate shift change to the appropriate personnel.			
	Fully debrief your relief on the incident status and actions being taken.			
	Record names along with date and time of the shift change.			
	Outgoing EOC	**Incoming EOC**	**Date**	**Time**
	DEACTIVATION CHECKLIST			
	Ensure all contacts made during the incident are aware of the status change.			
	Prepare the ***After Action Report-Section 6.1*** and the ***Evaluation of Emergency Procedures-Section 6.3,*** and ***Lessons Learned Log-Section 6.4.***			
	Hold debrief session with all involved.			

1.5 EMERGENCY BORDER CROSSING CHECKLIST

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	Employees responding to an Emergency in Canada must report to an **OPEN** Port of Entry (POE). Entry will be determined at the time of report (there are no blanket approvals in advance) and expect a COVID screenings.		
	Contact the Canadian Border Services Agency (CBSA) to notify them of an Emergency Crossing. *Initiate phone calls in the order listed below*		
	Chief [redacted]	M-F 8am-4pm Office: [redacted]	24/7 Cell: [redacted]
	Chief [redacted]	M-F 8am-4pm Office: [redacted]	24/7 Cell: [redacted]
	Chief [redacted]	M-F 8am-4pm Office: [redacted]	24/7 Cell: [redacted]
	Chief [redacted]	M-F 8am-4pm Office: [redacted]	24/7 Cell: [redacted]
	If no answer at any of these numbers, call the main number at the Port of Entry at Coutts 403-344-3772, ask to be connected to the Duty Chief.		
	Once you reach CBSA • Find out who and where to send a request letter and Employee Log to? Who_____Where_____ • A Sample Letter requesting a qualifying Canadian Authority to write a letter for an Emergency Border Crossing can be found in ***Section 4.7.*** • Complete a Log of all employees that will be present at the border. A copy will be needed at time of crossing as well as sent to CBSA in advance. See ***Employee Crossing Border Log-Section 3.7***		
	Send letter and employee log to contact noted above.		
	Employees must possess and present a form of photo identification (even during an emergency response): • Passport or Passport Card (preferred) • NEXUS Card (preferred) • Driver's License (accepted) • NorthWestern Energy Employee Badge (encouraged) • Military ID Card or Veterans ID Card (accepted) • Valid and notarized Birth Certificate (accepted) • Social Security Card (accepted when included with a valid government or non-government photo ID)		
	Process can be expedited by contacting/sending the above information to CBSA's Headquarters or Regional Operations Center: 1-800-461-9999 – They will disseminate the information to the proper Border Crossing Stations.		

	NorthWestern Energy Employees who meet any of the following criteria may not cross the border (even during an emergency response): • Any security issues (e.g. engaging in terrorism, organized crime, including membership in an organization that takes part in criminal activity, etc.); • Been involved in any human or international rights violation; • Any criminality (convicted of an offense that, if committed in Canada would constitute an criminal offense under an Act of Parliament, e.g. driving under the influence, narcotic offense, assault, sexual offense, weapons charge, theft, etc.).
	It is also encouraged to notify the United States Department of Homeland Security via U.S. Customs and Border Control: • U.S. Customs and Border Control: 1-877-227-5511 (not 24/7) • Area Port of Sweetgrass, MT: 406-335-9610 (24/7) *Note that while the Sweet Grass Port of Entry is unlikely to be the crossing point in an emergency, it is a Regional Port of Entry staffed 24/7 with Custom Agents and Border Patrol Agents available to help facilitate information and communication during an emergency situation.*

✓	**1.6 HANDLING CALLS FROM THE PUBLIC OR EMERGENCY SERVICES CHECKLIST**
	If a call is received in the GTS Gas Control room originating from the public (or Emergency Services), this is the step by step procedure for Gas Control to handle that call:
	1. Transfer the call using the instructions below: • Ask Caller if it's ok to hold while we connect with the NWE Distribution Dispatch [redacted] • On Avaya phone system, push the "Transfer" button. This brings up a new line and you will hear a dial tone. • Dial [redacted] select Distribution Dispatch by pushing "2". • When NWE Distribution Dispatch answers, explain to them you are Gas Control and you received a call from public. Tell NWE Distribution Dispatch you are conferencing the caller in. *If dispatch is not available please continue ***Guidelines for Gas Tutorial Form-Section 3.8*** and ask questions on page. • On Avaya phone system, push the "Conference" button. This will merge Gas Control, Caller and NWE Distribution Dispatch onto one call. • Introduce the Caller and NWE Distribution Dispatch. Ask caller to explain reason for call. (NWE Distribution Dispatch takes control of conversation at this point).
	2. Stay on call (For as long as possible) and listen for the information while NWE Distribution goes through their process. If you need to leave the conversation due to other phone calls or to handle system, ask NWE Distribution Dispatch to call you back when conversation with Caller is over.
	3. If the call is determined by dispatch to **NOT** be a Gas Transmission Emergency nor a Gas Transmission event, please complete "Calls from Public Log". • A copy is available on Gas Control SharePoint site under Gas Control Resources library.
	4. If the call is determined by dispatch **to be** a MT or SD Gas Transmission event, fill out the ***Guidelines for Gas Tutorial Form-Section 3.8*** to the best of your ability with information from Dispatch and/or Caller. • Relay information to Area/Local Supervisor or On Call Personnel to send First Responder for investigation. • If there is a report back of an emergency, proceed to ***GC Checklist- Section 1.1***
	5. If the call is determined by dispatch **to be** a Canadian Gas Transmission event, fill out the ***Guidelines for Gas Tutorial Form-Section 3.8*** to the best of your ability with information from Dispatch and/or Caller. • Contact EOC using ***GTS Qualified Personnel and Contact List- Section 5.2***
If "Emergency Response" packet is deemed necessary, this communication form must be included with all the documents within the packet for documentation of response.	

SECTION 2

2	Emergency Response for Specific Incidents
2.1	Fire Near or Directly Involving Pipeline Facility
2.2	Gas Detected Inside or Near a Building
2.3	Storage Well Loss of Control
2.4	Transmission Pipeline Blowing Gas or Generic Incident
2.5	Transmission Pipeline Explosion and/or Rupture

✓	2.1 FIRE NEAR OR DIRECTLY INVOLVING PIPELINE FACILITY
	Take into consideration the level of the emergency recorded in previous section. The procedures in this section are to be performed by trained and qualified personnel only. *When responding to a pipeline leak, always consider the possibility of multiple leaks*
	Do not extinguish burning gas from a pipeline break if a fire breaks out. • Secondary and non-gas related fires should be extinguished. • Employees should work closely with the fire department to mutually determine the best course of action. • Eliminate any additional ignition sources in the area if safe to do so. Permit only authorized personnel to go near the location.
	Appropriate Safety agencies should already be notified, such as 911 (if not contact them now) They can assist with: • Evacuating people from adjacent facilities or nearby buildings that may be endangered. • Close roads and set up detours as needed • Provide medical attention
	Evaluate the Schematic Drawing Book and ***if authorized***, • Request Gas Control to remotely close the valve or manually close valve if permission is given to isolate the transmission pipeline segment. • Operate valves only after authorization of the Operations Manager or Gas Control.
	Assess the damage to determine if a shutdown is required: • **Immediate shutdown** if an immediate public hazard exists or gas system pressures are decaying significantly. (Consider elevating to a Level 3, Critical Incident.) • **Planned shutdown** if there is no immediate public hazard and system pressures are stable. (Consider elevating to a Level 2, Serious Incident.) • **No shutdown** if temporary or permanent repairs can be made with the transmission pipeline in service, possibly at a reduced pressure. (Consider downgrading to a Level 1, Minor Incident.)
	Once the source of the incident has been determined, • Contact the appropriate personnel to investigate cause of failure. • Discuss repairs that will need to be made and form a plan • Verify with a Gas Detection Device that gas is no longer no longer a threat. • Establish a tactical response to reach incident objectives based on the following priorities: People, Environment, Assets, Restoration
	Account for all personnel in the unit or area where the incident occurred. When safe to do so, search for and rescue missing or injured personnel as directed by appropriate authority.
	When safe to do so, proceed with any repairs or other actions that are required.
	DEACTIVATION CHECKLIST
	Ensure all contacts made during the incident are aware of the status change.
	Review the response activities to determine if the emergency procedures manual along with its associated training is effective.
	Complete all paper work and return to the Operations Manager.
	Assist with preparation of the After Action Report
	Attend debrief session.

✓	2.2 GAS DETECTED INSIDE OR NEAR A BUILDING
	Take into consideration the level of the emergency recorded in the previous section. The procedures in this section are to be performed by trained and qualified personnel only. *When responding to a pipeline leak, always consider the possibility of multiple leaks*
	If inside a building, • Immediately stop work activities, safely evacuate the building. • Keep to a safe distance. • Secure the area and restrict access to trained personnel only. • Always look and listen for any signs of escaping gas. • Do not open any doors until air monitoring has been completed.
	Do not extinguish burning gas from a pipeline break if a fire breaks out. • Secondary and non-gas related fires should be extinguished. • Employees should work closely with the fire department to mutually determine the best course of action. • Eliminate any additional ignition sources in the area if safe to do so. • Permit only authorized personnel to go near the location.
	Shut off electrical power to the building and attempt to eliminate other potential ignition sources in the area containing gas. • Prevent vehicles from entering the area. If vehicles are already in the area, do not attempt to move them or shut them off. • Prevent smoking and other ignition sources. • Do not use telephones, cell phones, pagers, or radios in the hazardous area.
	Appropriate Safety agencies should already be notified, such as 911 (if not contact them now) They can assist with: • Evacuating people from adjacent facilities or nearby buildings that may be endangered. • Close roads and set up detours as needed • Provide medical attention
	Shut off gas source if possible. Close necessary inlet and outlet block valves and open blowdown valves.

	After gas sources are shut off, proceed to the building with a portable gas detector.
	• Check door seams for an explosive mixture.
	  ○ If an explosive mixture is not found, stand behind and to the side of the door while opening.
	• Insert only the gas detector probe into the building.
	  ○ If test results allow, enter, and ventilate the building and determine the source of the detected gas.

	Determine up line and down line damage to the Transmission Pipeline. • Always consider the possibility of multiple leaks.
	Evaluate the Schematic Drawing Book and ***if authorized***, • Request Gas Control to remotely close the valve or manually close valve if permission is given to isolate the transmission pipeline segment. • Operate valves only after authorization of the Operations Manager or Gas Control.

	Assess the damage to determine if a shutdown is required: • **Immediate shutdown** if an immediate public hazard exists or gas system pressures are decaying significantly. (Consider elevating to a Level 3, Critical Incident.) • **Planned shutdown** if there is no immediate public hazard and system pressures are stable. (Consider elevating to a Level 2, Serious Incident.) • **No shutdown** if temporary or permanent repairs can be made with the transmission pipeline in service, possibly at a reduced pressure. (Consider downgrading to a Level 1, Minor Incident.)
	Once the source of the incident has been determined, • Contact the appropriate personnel to investigate cause of failure. • Discuss repairs that will need to be made and form a plan • Verify with a Gas Detection Device that gas is no longer present. • Establish a tactical response to reach incident objectives based on the following priorities: People, Environment, Assets, Restoration
	Account for all personnel in the unit or area where the incident occurred. When safe to do so, search for and rescue missing or injured personnel as directed by appropriate authority.
	When safe to do so, proceed with any repairs or other actions that are required.
	DEACTIVATION CHECKLIST
	Ensure all contacts made during the incident are aware of the status change.
	Review the response activities to determine if the emergency procedures manual along with its associated training is effective.
	Complete all paper work and return to the Operations Manager.
	Assist with preparation of the After Action Report
	Attend debrief session.

✓	2.3 STORAGE WELL LOSS OF CONTROL
	Take into consideration the level of the emergency recorded in the previous section. The procedures in this section are to be performed by trained and qualified personnel only. *When responding to a pipeline leak, always consider the possibility of multiple leaks*
	Do not extinguish burning gas from a pipeline break if a fire breaks out. • Secondary and non-gas related fires should be extinguished. • Employees should work closely with the fire department to mutually determine the best course of action. • Eliminate any additional ignition sources in the area if safe to do so. • Permit only authorized personnel to go near the location.
	Appropriate Safety agencies should already be notified, such as 911 (if not contact them now) They can assist with: • Evacuating people from adjacent facilities or nearby buildings that may be endangered. • Close roads and set up detours as needed • Provide medical attention
	Assess possible damage at the Incident Site. Assess the damage to determine if a shutdown is required: • **Immediate shutdown** if an immediate public hazard exists or gas system pressures are decaying significantly. (Consider elevating to a Level 3, Critical Incident.) • **Planned shutdown** if there is no immediate public hazard and system pressures are stable. (Consider elevating to a Level 2, Serious Incident.) • **No shutdown** if temporary or permanent repairs can be made with the transmission pipeline in service, possibly at a reduced pressure. (Consider downgrading to a Level 1, Minor Incident.)
	Consult the area supervisor to determine how the well can be isolated from the gathering lines. • Shut off the gathering line to the loss of control well. • Shut in other storage wells that are adjacent to the loss of control well • Communicate with Gas Control as to not disrupt downstream service or other storage wells.
	From a safe distance determine what has occurred – valve failure, fitting failure, wellhead failure, etc.
	Use the wellhead pictures/diagram in the Schematic Drawing Book to determine which valves to operate to safely shut the well in. If there are services on the section to be isolated, the customers/Farm Taps shall be notified they will be out of gas.
	If the well can be shut-in and isolated from the gas source, shut the well in and allow the surrounding piping to blow down. • **This should only be done in coordination with Gas Control or the EOC.**
	If the leak is not stemmed by shutting the wellhead valves, the situation will be evaluated to determine if a pump truck can be safely connected to the wellhead. If a pump truck can be connected, the well will be killed with a KCL/water mixture following the appropriate kill procedure.
	If the well cannot be accessed to gain control or the area is unsafe to approach, Refer to Blow Out Contingency Plan (BCP). [redacted] Wild Well Control can be contacted by the EOC for inquires or mobilization. • See ***Pipeline, Well and Storage Contractor Contacts-Section 5.3***

	Once the well's gas flow has been contained, the failed components can be replaced – valves, fittings, etc. If the wellhead, tubing or other downhole components have failed, a workover rig will be moved in to replace or repair the failed components. • Discuss repairs that will need to be made and for a plan • Verify with a Gas Detection Device that gas is no longer present. • When safe to do so, proceed with any repairs or other actions that are required. • Establish a tactical response to reach incident objectives based on the following priorities: People, Environment, Assets, Restoration
	Account for all personnel in the unit or area where the incident occurred. When safe to do so, search for and rescue missing or injured personnel as directed by appropriate authority.
	DEACTIVATION CHECKLIST
	Ensure all contacts made during the incident are aware of the status change.
	Review the response activities to determine if the emergency procedures manual along with its associated training is effective.
	Complete all paper work and return to the Operations Manager.
	Assist with preparation of the After Action Report
	Attend debrief session.

✓	**2.4 TRANSMISSION PIPELINE BLOWING GAS OR GENERAL INCIDENT**
	Take into consideration the level of the emergency recorded in previous section The procedures in this section are to be performed by trained and qualified personnel only. *When responding to a pipeline leak, always consider the possibility of multiple leaks*
	Begin Emergency Shutdown if necessary and safe to do so. If the emergency shutdown control fails: • Close mainline fire gate valves if not in the fire area. • If in the fire area, close the nearest upstream and downstream valves.
	Provide engineering and technical support and monitor repair efforts to assure compliance with appropriate procedures
	Do not extinguish burning gas from a pipeline break if a fire breaks out. • Secondary and non-gas related fires should be extinguished. • Employees should work closely with the fire department to mutually determine the best course of action. • Eliminate any additional ignition sources in the area if safe to do so. • Permit only authorized personnel to go near the location.
	Appropriate Safety agencies should already be notified, such as 911 (if not contact them now) They can assist with: • Evacuating people from adjacent facilities or nearby buildings that may be endangered. • Close roads and set up detours as needed • Provide medical attention
	When pipelines have incurred suspected damage by excavating equipment, reduce the pressure in the pipeline; conduct a leak survey before repair efforts continue. • Mobilize welding equipment and provide welding services. • Mobilize heavy equipment and materials.
	Evaluate the Schematic Drawing Book and ***if authorized***, • Request Gas Control to remotely close the valve or manually close valve if permission is given to isolate the transmission pipeline segment. • Operate valves only after authorization of the Operations Manager or Gas Control.
	Assess possible damage at the Incident Site. Assess the damage to determine if a shutdown is required: • **Immediate shutdown** if an immediate public hazard exists or gas system pressures are decaying significantly. (Consider elevating to a Level 3, Critical Incident.) • **Planned shutdown** if there is no immediate public hazard and system pressures are stable. (Consider elevating to a Level 2, Serious Incident.) • **No shutdown** if temporary or permanent repairs can be made with the transmission pipeline in service, possibly at a reduced pressure. (Consider downgrading to a Level 1, Minor Incident.)
	Once the source of the incident has been determined, • Contact the appropriate personnel to investigate cause of failure. • Discuss repairs that will need to be made and form a plan • Verify with a Gas Detection Device that gas is no longer no longer a threat.

	• Establish a tactical response to reach incident objectives based on the following priorities: People, Environment, Assets, Restoration
	Account for all personnel in the unit or area where the incident occurred. When safe to do so, search for and rescue missing or injured personnel as directed by appropriate authority.
	When safe to do so, proceed with any repairs or other actions that are required.
	DEACTIVATION CHECKLIST
	Ensure all contacts made during the incident are aware of the status change.
	Review the response activities to determine if the emergency procedures manual along with its associated training is effective.
	Complete all paper work and return to the Operations Manager.
	Assist with preparation of the After Action Report
	Attend debrief session.

✓	2.5 TRANSMISSION PIPELINE EXPLOSION AND/OR RUPTURE
	Take into consideration the level of the emergency recorded in previous section The procedures in this section are to be performed by trained and qualified personnel only. *When responding to a pipeline leak, always consider the possibility of multiple leaks*
	Begin Emergency Shutdown if necessary and safe to do so. If the emergency shutdown control fails: • Close mainline fire gate valves if not in the fire area. • If in the fire area, close the nearest upstream and downstream valves.
	Do not extinguish burning gas from a pipeline break if a fire breaks out. • Secondary and non-gas related fires should be extinguished. • Employees should work closely with the fire department to mutually determine the best course of action. • Eliminate any additional ignition sources in the area if safe to do so. • Permit only authorized personnel to go near the location.
	Appropriate Safety agencies should already be notified, such as 911 (if not contact them now) They can assist with: • Evacuating people from adjacent facilities or nearby buildings that may be endangered. • Close roads and set up detours as needed • Provide medical attention
	Evaluate the Schematic Drawing Book and ***if authorized***, • Request Gas Control to remotely close the valve or manually close valve if permission is given to isolate the transmission pipeline segment. • Operate valves only after authorization of the Operations Manager or Gas Control.
	Assess possible damage at the Incident Site. Assess the damage to determine if a shutdown is required: • **Immediate shutdown** if an immediate public hazard exists or gas system pressures are decaying significantly. (Consider elevating to a Level 3, Critical Incident.) • **Planned shutdown** if there is no immediate public hazard and system pressures are stable. (Consider elevating to a Level 2, Serious Incident.) • **No shutdown** if temporary or permanent repairs can be made with the transmission pipeline in service, possibly at a reduced pressure. (Consider downgrading to a Level 1, Minor Incident.)
	Once the source of the incident has been determined, • Contact the appropriate personnel to investigate cause of failure. • Discuss repairs that will need to be made and form a plan • Verify with a Gas Detection Device that gas is no longer no longer a threat. • Establish a tactical response to reach incident objectives based on the following priorities: People, Environment, Assets. Restoration
	Account for all personnel in the unit or area where the incident occurred. When safe to do so, search for and rescue missing or injured personnel as directed by appropriate authority.
	When safe to do so, proceed with any repairs or other actions that are required.

	DEACTIVATION CHECKLIST
	Ensure all contacts made during the incident are aware of the status change.
	Review the response activities to determine if the emergency procedures manual along with its associated training is effective.
	Complete all paper work and return to the Operations Manager.
	Assist with preparation of the After Action Report
	Attend debrief session.

SECTION 3

3	Forms
3.1	Incident Action Plan
3.2	Activity Log
3.3	Emergency Response Sign-in Sheet
3.4	Tailboard Form for GTS
3.5	Atmospheric Monitoring Site Location
3.6	Atmospheric Monitoring Log
3.7	Employee Crossing Border Log
3.8	Guidelines for Gas Tutorial Form

3.1 INCIDENT ACTION PLAN

To be filled out by the Emergency Operations Center/Commander in conjunction with the Incident Command Post Commander.

Incident Name:		Location: *(Circle One)*		
		EOC	ICP	Other
Operational Period	From Date: (mm/dd/yyyy)	To Date : (mm/dd/yyyy)		
	From time: (24Hr)	To time: (24Hr)		
Prepared by (EOC Commander):		Signature:		
Phone Number:				
Prepared by (ICP Commander):		Signature:		
Phone Number:				

Current Situation (What is happening now?):

Anticipated duration of the Incident:

Diagram of the Incident:

Operational Period Objectives (What needs to be accomplished with in the time frame identified above?):

Strategies (General plan on how to accomplish the above objectives):

Tactics (Specific actions to be taken to accomplish the strategies above -- who, what, when, how?):
Construction (What materials need to be used to accomplish the above tactics?):
Safety Concerns (What issues with safety are specific to this incident?):
Communications Plan (What is the best way of communicating with other responders?):
Outstanding Issues (What are other issues that may come up as a result of implementing this plan?):

3.2 ACTIVITY LOG

To be completed by Gas Control, Incident Commander and the Emergency Operations Center, or assigned recorder, during an active emergency. Fill in page #'s below.

Incident Name:		Date of Incident:	
GC, ICP, EOC or recorder:		Date of Log:	
Incident Location:			
Incident Commander:			

Note: Activity can only be *On-Going, Completed or Follow-Up Required.* Details are incident information only or situation reports.

Time	Status	Activity/Details	Follow Up?

3.2 ACTIVITY LOG

To be completed by Gas Control, Incident Commander and the Emergency Operations Center, or assigned recorder, during an active emergency. Fill in page #'s below.

Incident Name:		Date of Incident:	
GC, ICP, EOC or recorder:		Date of Log:	
Incident Location:			
Incident Commander:			

Note: Activity can only be *On-Going, Completed or Follow-Up Required.* Details are incident information only or situation reports.

Time	Status	Activity/Details	Follow Up?

3.2 ACTIVITY LOG

To be completed by Gas Control, Incident Commander and the Emergency Operations Center, or assigned recorder, during an active emergency. Fill in page #'s below.

Incident Name:		Date of Incident:	
GC, ICP, EOC or recorder:		Date of Log:	
Incident Location:			
Incident Commander:			

Note: Activity can only be *On-Going, Completed or Follow-Up Required.* Details are incident information only or situation reports.

Time	Status	Activity/Details	Follow Up?

3.3 Emergency Response Sign In Sheet

Incident Name:	Date:	ICP Commander:	EOC Commander:

Time in and time out must be initialed by ICP Commander or EOC Commander

Last Name (*please print*)	First Name (*please print*)	Title	Incident Response Role (*if known*)	Time In	Initials	Time Out	Initials

3.4 Tailboard Form for GTS

1. Electronic Version of the Tailboard form can be found on NWE's intranet site. Access to this can be obtained using the following steps:

2. Or copy the link below:

[redacted]

   - Type 3661 in the search bar

3. See next page for a copy of the Tailboard for 3661

Form No. 3661 12/14 OL

NorthWestern Energy – GTS Tailboard Form

Date: _____ Time: _____

Employee in Charge: _____

☐ Routine Operations/Maintenance Area: _____

☐ Project Project Name/Description: _____

Ensure the Following are Discussed:

☐ Yes ☐ N/A	Vehicle and Pedestrian Traffic Control and Signage
☐ Yes ☐ N/A	Weather Related Risks
☐ Yes ☐ N/A	Slip, Trip and Fall Hazards
☐ Yes ☐ N/A	Atmospheric Monitoring Needs and Responsibilities
☐ Yes ☐ N/A	Crew Assignments – (Proper Number and Qualified)
☐ Yes ☐ N/A	Overhead Hazards
☐ Yes ☐ N/A	Underground Hazards (Locates Completed)
☐ Yes ☐ N/A	Safety/Operational Checks of Equipment
☐ Yes ☐ N/A	Safety/Operational Checks of Instruments
☐ Yes ☐ N/A	Written Procedures Reviewed
☐ Yes ☐ N/A	Gas Control Notified/Other Notifications

Flammable Control: is required for any temporary operation involving open flames, heat or spark producing equipment. This section is not required to be completed for a welding or fabrication shop/area.

☐ Yes ☐ N/A	Extinguishers are in service/operable
☐ Yes ☐ N/A	Flammable liquid, dust, lint and oily deposits removed from within 35 feet
☐ Yes ☐ N/A	Container purged of flammable liquid/vapor
☐ Yes ☐ N/A	Explosive atmosphere monitored/eliminated
☐ Yes ☐ N/A	Fire Watch during operation and 60 minutes following operation. Initials _____
☐ Yes ☐ N/A	Final Fire Watch assessment completed after 60 minute watch. Initials _____

Unique Hazards of this Job: List _____

☐ Yes ☐ N/A Required PPE: List _____

☐ Yes ☐ N/A Lockout Tag Out Requirements: List _____

All Persons Present Must Sign

Employee Number	Signature

3.5 Atmospheric Monitoring Site Location

Incident Name:	Prepared By: (Print)	Date:
Incident Number:	Signature:	Time:

Examples of what to Draw In:	Incident Command Center	Gas Envelope
Evacuation Routes	Structures, Roads, Bodies of water, etc.	Indicate Distances (feet, yards, miles, etc.)

INCIDENT DRAWING ✖ **indicates Incident Location**

3.6 Atmospheric Monitoring Log

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

3.6 Atmospheric Monitoring Log

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Self-printed and locally saved copies are uncontrolled and unauthorized for Operational use

3.6 Atmospheric Monitoring Log

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

3.6 Atmospheric Monitoring Log

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

Site Location #________

Date	Time	Employee Name	Flammable Gas/Vapor			Wind Direction (Adjust as Wind Direction Changes)
			% LEL	% Gas	PPM	

3.7 EMPLOYEE CROSSING BORDER LOG

	Legal First Name	Middle Name	Last Name:	Date of Birth:	ID Type: ie Passport	ID Number:	Vehicle Description: Year, Make, Model, Color	Vehicle License Plate #:	Border Crossing Station Name:	Expected Time of Arrival:
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										
19										
20										

✓	3.8 GUIDELINES FOR GAS TUTORIAL FORM			
Circle all that Apply:	**Gas Leak**	**Hit Line**	**Explosion or Fire**	**Pipeline Rupture**

Do you smell an Odor? Have customer be as specific as possible - Inside? Outside? Along the Highway?

*If Odor is Inside Advise Caller: Do Not hang up the telephone, operate any appliances or turn light switches or breakers on or off
ASSURE caller help is on the way

Business or a Multiple Family Dwelling:

DO NOT attempt to evacuate the business or multiple family dwelling - advise caller YOU will notify 911 to evacuate the premises. Also, ONLY if the caller is UNABLE to EVACUATE, advise YOU will notify 911 for assistance.

Single Family Dwelling:

EVACUATE and CLEAR the PREMISES IMMEDIATELY
ONLY if the caller is UNABLE to EVACUATE, advise YOU will notify 911 for assistance.

*If Odor is Outside: Advise caller to close all windows and doors.

Do you know if there is a hit, broken or damaged gas line?

*If Yes, Do you know how this happened? (Shovel, backhoe, etc.)

Do you know whether the gas line is plastic or steel?

Can you hear leaking or blowing gas?

Location of Incident? (Address, City, nearest landmark, mile marker, GPS coordinates, etc.):

Are there special instructions:

Time of Incident?

Was anyone injured?

Has 9-1-1 been called?

If Not, and injuries or If there is a release of gas, Contact 911

See ***Civil Authorities Contacts-Section 5.1***

Callers Name:	Call back Phone Number:
Callers Address:	Time Call was Received:

This form shall be immediately passed to the Emergency Operations Center

Prepared by:	Date:

SECTION 4

4	Reference Material
4.1	Incident Classification Table
4.2	Incident Reminders
4.3	Tool, Materials and Equipment List
4.4	Communication Procedures
4.5	Company Incident Command Structure
4.6	Emergency Border Crossing Procedures
4.7	Letter for Emergency Border crossing
4.8	Gas Transportation Critical Operation Time Procedure
4.9	Sheltering Criteria and Procedure
4.10	Training and Continuing Education Document
4.11	Handheld/ Personal Radio Instructions
4.12	Vehicle Mounted Radio Instructions
4.13	Emergency Shutdown Procedure and Schematics
4.14	Canadian Schematic Drawings
4.15	Area Maps General Information
4.16	How to use GPS in the GIS System
4.17	Management of Threat and Emergency Reponses Risk Table
4.18	Safety Data Sheet for Natural Gas
4.19	Canadian Role of Government Entities
4.20	Emergency Response Assistance Agreement
4.21	General and Site Specific Emergency Response Procedures

4.1 INCIDENT CLASSIFICATION TABLE

The level of emergency defines the severity of the incident, the potential hazards to the public and the environment and the appropriate response. A level is assigned when the emergency meets one or more conditions of the higher level. For example, if an incident needs several conditions under level 1 (Moderate) and Level 2 (Serious) in the table (on the next page), it is a Level 2 Emergency.

CONDITION	LEVEL 0 - ALERT	LEVEL 1 – MODERATE	LEVEL 2 – SERIOUS	LEVEL 3 – CRITICAL
Threat or Injury to Worker or Public	No immediate threat and no injury.	Potential exists for some injury or threat.	Some injury or threat.	Serious injury or fatality and/or ongoing threat.
Containment within Company Property	Restricted to the Incident Site or is within company property.	Very limited or no effects to third party property or pipeline right of way.	Potential threat to company facility infrastructure. No immediate threat outside company property, but potential exists to extend beyond boundaries.	Ongoing or imminent threat to facility infrastructure. Effects extend beyond company boundaries.
Control of Product	Control completed or can be immediately controlled via standard Operations and Maintenance procedures.	Control of released product is pending.	Control likely imminent.	Uncontrolled release of gas continues and control is not imminent.
Potential Environmental Effects	None.	Minimal.	Moderate or ongoing.	Significant and ongoing.
Media Interest	No interest.	Little interest.	Local or regional interest.	National or regional interest.
Response Capability	Incident is handled by NorthWestern Energy through normal operating procedures or through the Operations & Maintenance Manual.	Emergency Services may be involved but the incident is handled by NorthWestern Energy or it's Contractors.	Emergency Services, First Responders and government agencies are likely to be directly involved.	Immediate and significant government agency involvement or multiple government agency response.
Potential to escalate	Zero.	Low or very little risk of escalating to a Level 2 emergency.	Moderate, based on potential for fire, explosion, increased release of gas, or other hazard.	High, based on potential or occurring fire, explosion, increased release of gas, or other hazard.
Accidental Releases and/or Equipment Failure	Restricted to the site or within company property.	Very limited or no effects to company assets or third party property or parties.	Moderate effects to company assets or to third party property or parties.	Severe effects to company assets or to third party property or parties.
Natural Disaster (Flood, Earthquake, Fire, Severe Weather, etc.)	None.	Low risk to pipeline infrastructure and assets. Limited release of product.	Moderate risk to pipeline infrastructure and assets. Ongoing release of product.	Severe risk to pipeline infrastructure and assets. Sustained and uncontrolled release of product.
Third Party Emergency	No affects to company assets. No company response other than communication with the Third Party.	Low risk to company assets. Qualified First Responder is dispatched to monitor situation and communicate with the Third Party.	Moderate risk to company assets. Emergency Operations Center and Incident Command Center established.	Severe risk to company assets. Emergency Operations Center and Incident Command Center established.
Examples	Small or insignificant leak found on patrol. Damage to facility equipment and/or piping with an immediate or near immediate control expected. Gas release onsite not affecting public safety. Underground leak on pipeline or outside of facilities not entering structures or underground utilities	Vehicle accident involving facility with moderate damage to facility Damage to facility equipment and/or piping with gas release; control expected within 4 hours Gas release beyond site affecting public safety, area successfully evacuated Underground leak on pipeline or outside of facilities with potential to enter structures or underground utilities	Unable to control damage on site, requiring control off site Damage to facility equipment and/or piping with gas release Underground leak on pipeline entering structures or underground utilities; control expected within 4 hours Facility overpressure condition discovered and controlled Gas release beyond site affecting public safety; area evacuated within 1 hour Failure of facility to deliver downstream supply; < 500 customers without service	Underground leak on pipeline, entering structures or underground utilities; control not expected for more than 4 hours Facility overpressure condition discovered and not controlled Failure of facility to deliver downstream supply; > 500 customers without service > 1 day relight with multiple resources and divisions involved
Required Action Based on Emergency Level	This may be a Abnormal Operating Condition (AOC). Use the Operations and Maintenance Manual to resolve. Does not require an Emergency Response.	Emergency Procedures Manual is invoked with any Supervisor approval. Email documentation of the Incident is forwarded to the Gas Operations Manager post emergency.	Invoke the Emergency Procedures Manual. Mandatory review of the Incident Response is required post emergency. All documentation is forwarded to the Gas Operations Manager.	Invoke the Emergency Procedures Manual. Mandatory review of the Incident Response is required post emergency. All documentation is forwarded to the Gas Operations Manager.

4.2 INCIDENT REMINDERS

Site Control Incident Reminders

- Consider contacting land owners ahead of time if the emergency is taking place on private property.
- Have first responders or other onsite personnel give detailed directions to Gas Control or the EOC, in order to locate the site. Pass this on to personnel traveling to the site.
- Remember that emergency crews may be responding to an area unfamiliar to them.
- Have first responders or other onsite personnel determine an emergency evacuation route in case the primary access point is compromised.
- Consider turning on "Location Sharing" on personnel's iPhones.
- If evacuations are needed GIS can determine evacuation addresses for homes, businesses, buildings, etc.

Manpower Incident Reminders

- Consider mobilizing or notifying Maintenance and Operations Crews of the emergency.
  - This may be getting crews ready to respond to the actual emergency or it may involve sending crews home for rest in order to be replacement crews.
  - This could involve anyone from the Westline crews to the Engineering or Drafting Departments. Or it may be a replacement for the on-site Incident Commander. Really think about who will be needed for the emergency response.
- A detailed list of who is responding and to where should be maintained by the EOC.
- Consider how long the emergency response will take. This will help determine the need for necessities such as food, water, sleep, and restroom breaks etc.
- Consider portable bathrooms for long term emergencies.
- For long emergencies, consider things such as hotel rooms, food delivery, portable toilets etc.

Curtailment Plan Incident Reminders

- Past emergencies have proven that curtailment plans take long periods of time to develop and then implement due to notification requirements. Consider starting to develop a curtailment plan even if it is not needed at the time.

Communications Plan Incident Reminders

- Consider turning on "Location Sharing" on personnel's iPhone.
- Once the EOC has been established, consider having an "always on" conference line opened.
- Ensure the conference number, conference ID, and conference passcode are communicated to relevant personnel.
- Consider bringing in radios to the EOC room.
- Consider bringing in a SCADA screen to the EOC room.

Safety

- Remind employees about the use of safe practices for egress over fences, structures, ditches, and obstacles.
- Remind employees to bring extra phone chargers, radio chargers, extra radio batteries, battery charging banks, and CGI batteries/chargers.
- Remind employees to work in groups or teams of two or more when resources allow it.

4.3 Tools, Materials and Equipment List

Supplies List	[redacted]						
Site Control Items							
Traffic Barricades			X				
Traffic Cones			X				
Orange Fencing			X		X		X
Traffic Lights			X				
Utility Traffic Signs			X				
Handheld Traffic Signs			X				
Wind Direction Flags			X				
Barricade tape			X	X	X		X
First Aid and Fire Equipment							
First Aid Kits	X	X	X	X	X	X	X
AED	X		X				X
Fire Extinguishers	X	X	X	X	X	X	X
Personal Protective Equipment							
Hardhats	X	X	X	X	X	X	X
High Visibility Vest			X	X	X		X
Safety Glasses	X		X	X	X		X
Hearing Protection	X		X	X	X	X	X
FR Coveralls					X		
FR Hoods					X		
FR Gloves							
SCBAs							
Rescue Equipment							
Non Entry Retrieval System			X				X
Retrieval Rope			X				X
Rescue Board							X
Other Tools and Equipment							
Multi Gas Monitors	X		X	X	X		X
Satellite Phone							
Intrinsically safe radios				X			
Emergency Handbooks	X	X	X	X	X	X	X
System Diagram book	X	X	X	X	X	X	X
Mueller Equipment			X				X

Supplies List	[redacted]		[redacted]			
Site Control Items						
Traffic Barricades	X	X	X	X	X	X
Traffic Cones	X	X	X	X	X	X
Orange Fencing	X	X	X	X	X	X
Traffic Lights	X	X	X	X	X	X
Utility Traffic Signs	X	X	X	X	X	X
Handheld Traffic Signs	X	X	X	X	X	X
Wind Direction Flags						
Barricade tape				X	X	
First Aid and Fire Equipment						
AED	X	X	X	X	X	X
First Aid Kits	X	X	X	X	X	X
Fire Extinguishers	X	X	X	X	X	X
Personal Protective Equipment						
Hardhats	X	X	X	X	X	X
High Visibility Vest	X	X	X	X	X	X
Safety Glasses	X	X	X	X	X	X
Hearing Protection	X	X	X	X	X	X
FR Coveralls						
FR Hoods						
FR Gloves						
SCBAs	4 units					
Rescue Equipment						
Non Entry Retrieval System	X	X		X	X	X
Retrieval Rope	X			X	X	X
Rescue Board	X					
Other Tools and Equipment						
Combustible Gas Monitors	X	X	X	X	X	X
Multi Gas Monitors	X	X	X	X	X	X
Satellite Phone					X	X
Intrinsically safe radios	X	X		X	X	X
Emergency Handbooks	X	X	X	X	X	X
System Diagram book	X	X	X	X	X	X
Mueller Equipment	Through 8"	Through 8"	Through 4"	Through 8"	Through 6"	Through 4"

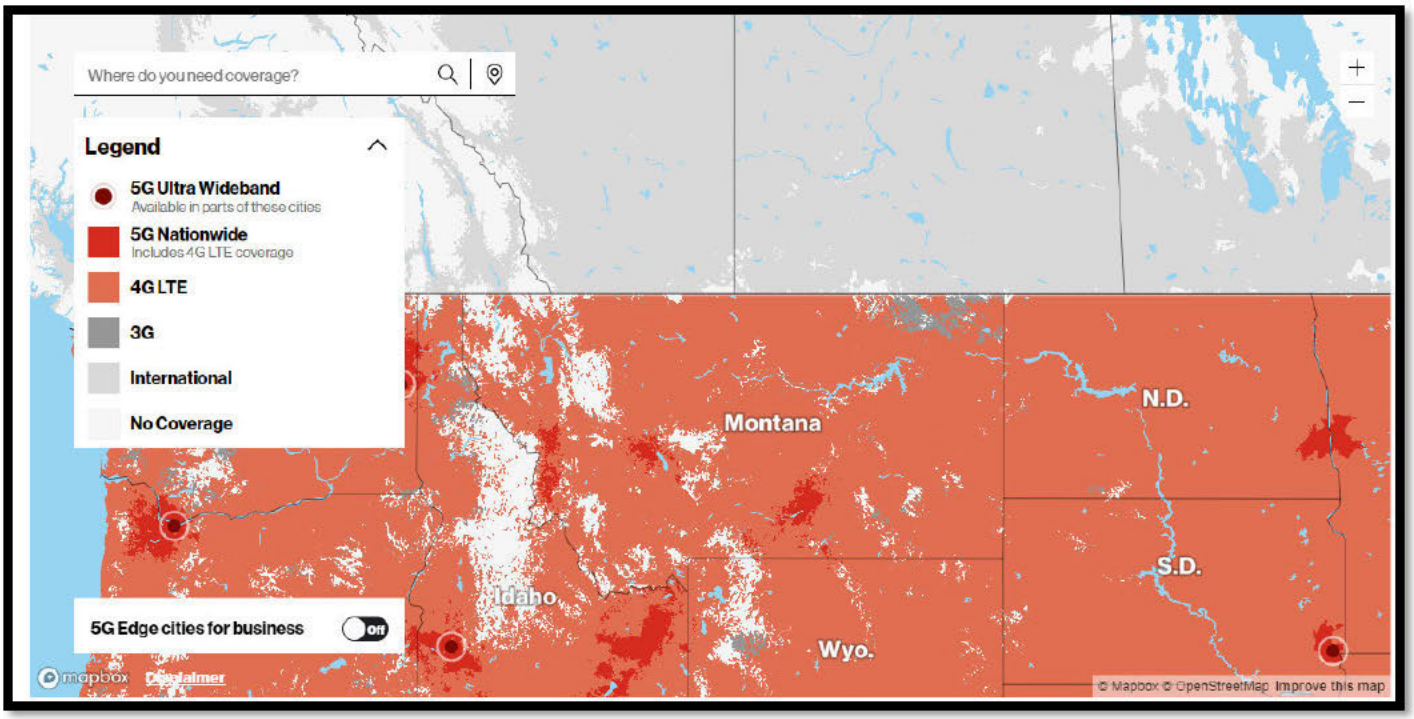
Supplies List	[redacted]				
Site Control Items					
Traffic Barricades	X	X	X	X	X
Traffic Cones	X	X	X	X	X
Orange Fencing	X	X	X	X	X
Traffic Lights					
Utility Traffic Signs	X	X	X	X	X
Handheld Traffic Signs	X	X	X	X	X
Wind Direction Flags	X	X	X	X	X
Barricade tape	X	X	X	X	X
First Aid and Fire Equipment					
AED	X	X	X	X	X
First Aid Kits	X	X	X	X	X
Fire Extinguishers	X	X	X	X	X
Personal Protective Equipment					
Hardhats	X	X	X	X	X
High Visibility Vest	X	X	X	X	X
Safety Glasses	X	X	X	X	X
Hearing Protection	X	X	X	X	X
FR Coveralls	X			X	X
FR Hoods				X	X
FR Gloves				X	
SCBAs					
Rescue Equipment					
Non-Entry Retrieval System	X	X			X
Retrieval Rope	X	X			X
Rescue Board					
Other Tools and Equipment					
Combustible Gas Monitors	X	X	X	X	X
Multi Gas Monitors	X	X	X	X	X
Satellite Phone		X			X
Intrinsically safe radios	X		X	X	X
Emergency Handbooks	X	X	X	X	X
System Diagram book	X	X	X	X	X
Mueller Equipment	Through 8"	Through 4'	Through 4"	Through 4"	Through 4"

Supplies List	[redacted]				
Site Control Items					
Traffic Barricades	X				X
Traffic Cones	X	X	X		X
Orange Fencing	X	X	X		X
Traffic Lights					
Utility Traffic Signs	X	X	X		X
Handheld Traffic Signs	X				
Wind Direction Flags					
Barricade tape	X				
First Aid and Fire Equipment					
AED					
First Aid Kits	X	X	X		X
Fire Extinguishers	X	X	X		
Personal Protective Equipment					
Hardhats	X	X	X		
High Visibility Vest	X	X	X		
Safety Glasses	X	X	X		
Hearing Protection	X	X	X		
FR Coveralls	X	X	X	X	X
FR Hoods	X	X	X		X
FR Gloves	X				X
SCBAs	X			X	
Rescue Equipment					
Non-Entry Retrieval System	X				
Retrieval Rope	X				
Rescue Board					
Other Tools and Equipment					
Combustible Gas Monitors	X	X	X	X	X
Multi Gas Monitors	X				
Satellite Phone					
Intrinsically safe radios					
Emergency Handbooks	X	X	X		
System Diagram book	X	X	X		
Mueller Equipment	X		X		

4.4 Communication Procedures

Smartphone Information

- GTS Emergency Conference Bridge Phone Number, Dial: [redacted]
- Montana and South Dakota communication:
  - Smartphones will typically provide sufficient coverage.
- Canada Communication:
  - All Canada Montana Pipeline (CMPL) Employees reporting to an Emergency Response in Canada will be required to have one of the following:
  - A NorthWestern Energy issued cell phone connected to the Verizon Wireless Network
  - A personal smartphone connected to the Verizon Wireless Network
- As detailed in the Verizon Wireless Coverage Map below (updated 2022), Verizon Wireless has coverage over the entire area in which the Canada Montana Pipeline Company's assets reside. https://www.verizon.com/coverage-map/ (sitemap at the bottom of page, Coverage Map)



Radio Information

- Montana and South Dakota communication:
  - For ***Handheld Radio Instructions-Section 4.11*** and ***Vehicle Mounted Radio Instructions-Section 4.12***.
- Canada Communication:
  - The Chief Administrative Officer of Cardston County has worked with the Canada Montana Pipeline Company and will issue Emergency Response Employees up to eight (8) radios.
  - The radios work on the Emergency Services bandwidth that is used in Cardston County and the surrounding areas.

- Employees will be directed to use the Emergency Services radios to communicate with local and on-site Emergency Services Personnel. A designated Communication Officer will update the Emergency Operations Center via a Verizon Wireless cell phone as to the communication at the Incident Site.

Notify NWE Divisions or Districts of a Gas Emergency Assistance

- In the event of a Gas Emergency where assistance of local personnel is required, contact local area Manager and/or Gas Supervisor.
  - Identify yourself
  - Briefly inform the representative of the gas emergency.
  - Request contact with the Supervisor on Call for the geographic area of the emergency.
  - Provide the representative the information below so the On Call Supervisor can contact you (or the appropriate person):
    - Name
    - Telephone or cell phone number
    - Pager or radio contact information
    - Nature of the incident
    - Location of the incident
    - Time of the incident
    - Current status of the incident

Public and Media Notification

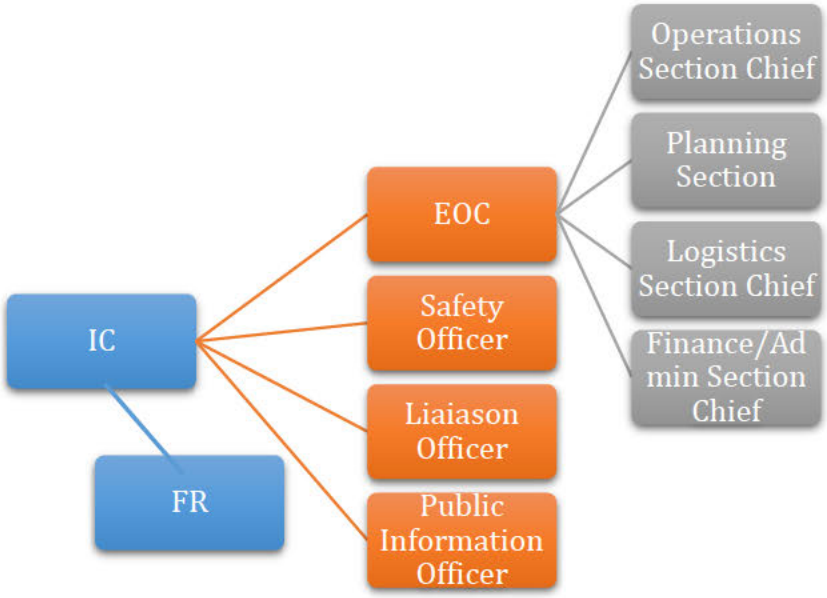
- When an Emergency arises that necessitates notification of the public CMPL/NWE will work with local emergency officials to notify the public.
  - The NorthWestern Energy Corporate Communications Director will coordinate all contact with external agencies. See ***Emergency Operations Center Checklist-Section 1.4***

Communication with Emergency Services (i.e. Police, RCMP, Fire, EMS, Regulatory)

- When external agencies are involved with NorthWestern Employees, a joint Incident Command shall be established.
  - Each external agency will identify an IC that will be stationed at the IC gathering point
  - Communication is critical in an incident and when there are many agencies participating.
  - In the event a joint IC is not established, a common radio frequency should be identified for communications between agencies.
  - If a joint IC is not developed, an IC will be designated (Fire, Police, NorthWestern) who will run the incident command.
- Each external agency will be tasked with what is within their expectations. A person will not be put into a spot that they are not trained or prepared for.
  - Example - A police officer will not be asked to monitor gas perimeter, unless they are trained to do so.
- Agencies and level of response to which they are assisting will vary from incident to incident. A responsibility plan will be developed when each instance arises. Some of the possible roles shall be.

- Police, EMS, Fire may assist with the following items if they have training to do so and in locations that require monitors, they are trained and have monitors available.
  - Fire may determine that they are IC, NWE will coordinate with them through the IC
  - Responding resources may be asked to assist with control to the site.
  - If necessary and trained and have equipment available, responders may be able to assist with monitoring the gas plume or migration paths
  - Response personnel may assist with evacuations
    - Evacuators shall have a monitor with them and be knowledgeable with the monitor
    - A NorthWestern Employee will assist with evacuations if responders do not have monitors
- Regulatory Officials may assist with the following items if they have the training to do so.
  - Assist with the IC and response
- Assist with oversight of the response and guidance of response actions and mitigation

4.5 Company Incident Command Structure



- **First Responder (FR) –** Usually the first employee on scene at an emergency situation. The FR is responsible for protecting the safety of both himself and the public, stabilize the incident (if possible) and make the situation safe, and finally the FR is responsible for the protection of property both of the public and of the transmission system.
- **Incident Commander (IC) –** Ensures public safety measures are in place at the incident site, coordinates and manages response actions at the incident site, and reports and receives information from the EOC.
- **Emergency Operations Center Commander (EOC) –** Acts as the authority for the initial emergency response actions for the transmission pipeline and storage related incidents. Supports and communicates with the IC while ensuring the safe operation of the unaffected portion of the pipeline and storage system.
  - **Operations Section Chief –** Keeps the situation safe, advises the EOC on possible solutions and outcomes. Works to implement the solution when warranted. Works with the Planning Section Chief to keep accurate information flowing about the situation.
  - **Logistics Section Chief –** Provides facilities, services, people, and materials in support of the incident, advises the EOC on logistics planning, communications, and personnel, and works with the EOC, Planning Section Chief, and the Operations Section Chief to provide resources for the Incident.
  - **Planning Section Chief –** Collects information from the Operations Section Chief to maintain accurate communications to the EOC, works with the EOC to strategize possible solutions and fixes, and works with the Logistics Sections Chief to ensure resources for the fix are in place.
  - **Finance/Administration Section Chief –** Is in charge of finances and the administration items related to an emergency response.
- **Safety Officer –** Maintains the safety of all employees and personnel at the Incident Site and ensures everyone is briefed on the Safety Plan and that everyone follows it.
- **Liaison Officer –** Communicates with Emergency Services and keeps the Unified Command up to date on actions of the NorthWestern Energy Incident Command. The Liaison Officer also keeps the NorthWestern Energy Incident Command up to date on the actions of the Unified Command.
- **Public Information Officer –** Speaks to the media and the press on behalf of the IC, CMPL and NorthWestern Energy. Provides a consistent message about the Incident and what is happening. Dispels any rumors and reminds the Public about key safety issues and the importance of letting responders do their job safely and effectively.

Incident Command Structure

Incident Commander: Overall Head of Incident

- Ensuring clear authority and knowledge of agency policy.
- Ensuring incident safety.
- Establishing an Incident Command Post.
- Obtaining a briefing from the prior Incident Commander and/or assessing the situation.
- Establishing immediate priorities.
- Determining incident objectives and strategy (ies) to be followed.
- Establishing the level of organization needed, and continuously monitoring the operation and effectiveness of that organization.
- Managing planning meetings as required.
- Approving and implementing the Incident Action Plan.
- Coordinating the activities of the Command and General Staff.
- Approving requests for additional resources or for the release of resources.
- Approving the use of participants, volunteers, and auxiliary personnel.
- Authorizing the release of information to the news media.
- Ordering demobilization of the incident when appropriate.
- Ensuring incident after-action reports are complete.
- Authorizing information release to the media.

Public Information Officer: Communications Coordinator

- Determine, according to direction from the IC, any limits on information release.
- Develop accurate, accessible, and timely information for use in press/media briefings.
- Obtain IC's approval of news releases.
- Conduct periodic media briefings.
- Arrange for tours and other interviews or briefings that may be required.
- Monitor and forward media information that may be useful to incident planning.
- Maintain current information, summaries, and/or displays on the incident.
- Make information about the incident available to incident personnel.
- Participate in the planning meeting.

Safety Officer: Ensure Safe Operation during incident

- Identify and mitigate hazardous situations.
- Ensure safety messages and briefings are made.
- Exercise emergency authority to stop and prevent unsafe acts.
- Review the Incident Action Plan for safety implications.
- Assign assistants qualified to evaluate special hazards.
- Initiate preliminary investigation of accidents within the incident area.
- Review and approve the Medical Plan.
- Participate in planning meetings.

Liaison Officer: Organizational and Interagency Representative

- Act as a point of contact for agency representatives.
- Maintain a list of assisting and cooperating agencies and agency representatives.
- Assist in setting up and coordinating interagency contacts.
- Monitor incident operations to identify current or potential inter-organizational problems.

- Participate in planning meetings, providing current resource status, including limitations and capabilities of agency resources.
- Provide agency-specific demobilization information and requirements.

Operations Section Chief: Manage workload and supervise overall workforce

- The Incident Action Plan (IAP) provides the necessary guidance. The need to expand the Operations Section is generally dictated by the number of tactical resources involved and is influenced by span of control considerations.
- Assure safety of tactical operations.
- Manage tactical operations.
- Develop the operations portion of the IAP.
- Supervise execution of operations portions of the IAP.
- Request additional resources to support tactical operations.
- Approve release of resources from active operational assignments.
- Make or approve expedient changes to the IAP.
- Maintain close contact with IC, subordinate Operations personnel, and other agencies involved in the incident.

Planning Section Chief: Collects situation and resources status information, evaluates it, and processes the information for use in developing action plans

- The Planning Section Chief is responsible for providing planning services for the incident. Dissemination of information can be in the form of the IAP, in formal briefings, or through map and status board displays.
- Collect and manage all incident-relevant operational data.
- Supervise preparation of the IAP.
- Provide input to the IC and Operations in preparing the IAP.
- Incorporate Traffic, Medical, and Communications Plans and other supporting materials into the IAP.
- Conduct and facilitate planning meetings.
- Reassign personnel within the ICS organization.
- Compile and display incident status information.
- Establish information requirements and reporting schedules for units (e.g., Resources, Situation Units).
- Determine need for specialized resources.
- Assemble and disassemble Task Forces and Strike Teams not assigned to Operations.
- Establish specialized data collection systems as necessary (e.g., weather).
- Assemble information on alternative strategies.

Logistics Section Chief: Room, board, and travel coordinator

- The Logistics Section Chief provides all incident support needs with the exception of logistics support to air operations.
- Provide all facilities, transportation, communications, supplies, equipment maintenance and fueling, food and medical services for incident personnel, and all off-incident resources.
- Manage all incident logistics.
- Provide logistical input to the IAP.
- Brief Logistics Staff as needed.
- Identify anticipated and known incident service and support requirements.

- Request additional resources as needed.
- Ensure and oversee the development of the Communications, Medical, and Traffic Plans as required.
- Oversee demobilization of the Logistics Section and associated resources.

Finance/Administration Section Chief: Manage all financial aspects of an incident.

- Not all incidents will require a Finance/Administration Section. Only when the involved agencies have a specific need for finance services will the Section be activated.
- Manage all financial aspects of an incident.
- Provide financial and cost analysis information as requested.
- Ensure compensation and claims functions are being addressed relative to the incident.
- Gather pertinent information from briefings with responsible agencies.
- Develop an operating plan for the Finance/Administration Section and fill Section supply and support needs.
- Determine the need to set up and operate an incident commissary.
- Meet with assisting and cooperating agency representatives as needed.
- Maintain daily contact with agency(s) headquarters on finance matters.
- Ensure that personnel time records are completed accurately and transmitted to home agencies.
- Ensure that all obligation documents initiated at the incident are properly prepared and completed.
- Brief agency administrative personnel on all incident-related financial issues needing attention or follow-up.
- Provide input to the IAP.

Additional Command Staff

Engineering: Build and manages orders during event

- Review, design, and build orders for damaged asset replacements.
- Assist in confirmation of incidents.

Materials: Order and picks materials for orders

- Coordinate and procure materials for necessary orders.
- Setup picklists for orders.

Gas Transmission and Storage: Liaison to gas transmission

- Coordinate efforts pertaining to Gas Transmission & Storage emergencies.
- Ensure compliance towards pipeline integrity.

Additional Command staff positions may also be necessary depending on the nature and location(s) of the incident, and/or specific requirements established by the Incident Commander.

For example, a Legal Counsel may be assigned directly to the Command Staff to advise the Incident Commander on legal matters, such as emergency proclamations, legality of evacuation orders, and legal rights and restrictions pertaining to media access.

Similarly, a Medical Advisor may be designated and assigned directly to the Command Staff to provide advice and recommendations to the Incident Commander in the context of incidents involving medical and mental health services, mass casualty, acute care, vector control, epidemiology, and/or mass prophylaxis considerations, particularly in the response to a bioterrorism event.

4.6 Emergency Border Crossing Procedure

General Items and Background

- The rules governing whether or not a U.S. citizen can work in Canada are found in the Canadian federal *Immigration and Refugee Protection Act* (IRPA) and Regulations. Two sections of NAFTA also have implications for an American company's employees. Unless an emergency exists, there are significant restrictions. In addition, there may be health requirements established by the Public Health Agency of Canada (PHAC) and the Government of Canada which will have to be met before entry is granted to Canada.
- All US persons responding to an emergency in Canada are required to report into a Canadian Border Services Agency (CBSA) office that is open for business. It is at this time of reporting in to a CBSA office that a final determination under IRPA and health protocols will be made as to whether a person may be granted entry to Canada.
- Because of agreements between Canada and the United States, emergency response personnel from the United States can enter Canada without special documentation or permits. This is facilitated by Paragraph 186(t) of the *Immigration and Refugee Protection Regulations, which* provides that a foreign national may work in Canada without a work permit if they are providing emergency services, including medical services, for the protection or preservation of life, property or the environment.
- Border authorities have recommended that they be notified by telephone that an emergency response team is going to report at a specific border crossing and its expected time of arrival. It is also recommended to have a provincial, municipal or federal authority involved with the emergency contact border officials to confirm that an emergency exists. Entry into Canada will be determined at the time of entry by CBSA officers. Requests for entry to Canada would be best supported if the response team can provide a signed letter from a Canadian authority confirming the nature of the emergency, identifying the names of the persons needing entry into Canada and providing a contact person that Immigration Canada can contact should they have any questions.
- To expedite the process further, this documentation below can be sent to CBSA before departure to allow much of the pre-screening process to occur before arrival at the port. Documentation can be sent to CBSA's Headquarters or a Regional Operations Center, which will then disseminate the information to the appropriate port of entry. The use of NEXUS cards can also facilitate entry into the country by decreasing screening time for individuals that have cards.
- Be aware that despite this exemption, other factors could prevent response personnel from crossing the border. Those factors and restrictions are listed in the ***Emergency Border Crossing Checklist-Section 1.5.***

4.7 Letter for Emergency Border Crossing

This is a sample Letter requesting a qualifying Canadian Authority to write a letter for an Emergency Border Crossing.

NorthWestern Energy
Canada Montana Pipeline Company
Emergency Procedures Manual
Gas Transmission and Storage
(Delete all of the above headers for easy Printing, update the highlighted sections)

(Date)

Authorities Name

Authorities Address

Authorities Address

Subject: Letter Authorizing NorthWestern Energy to Cross the Canadian Border Due To a Pipeline Emergency

To Whom It May Concern:

The Canadian Montana Pipeline Company (owned and operated by NorthWestern Energy) is currently in an Emergency Response due to a ***(insert reason for emergency here)***. In accordance with the Canadian Federal Immigration and Refugee Protection Act (paragraph 186(t)) we are requesting you write and direct a letter to the Canadian Border Services Agency (CBSA) requesting emergency response services from the Canada Montana Pipeline Company. Employees will be arriving at (Name and location of Border Station at approximately… time).

Your swiftness with this matter is much appreciated.

Sincerely,

_____

[redacted]

Enclosures (2) ***(If any)ie: employee log***

4.8 Gas Transportation Constrained and Critical Operating Time Procedure

- It is important to realize that this procedure provides guidelines for managing the Gas Transmission & Storage system during extreme conditions. However, the transmission operations group must have flexibility to exercise reasonable judgment given constantly changing operating conditions.
- Follow the links for the full document:
  - [redacted]
  - [redacted]

4.9 Sheltering Criteria and Procedures

Public Sheltering In Place Information

- When an Emergency arises that necessitates the need for sheltering from the emergency, the following is a non-exhaustive list of suggestions that will be communicated to the Public during and Emergency. Use this list in conjunction with the ***Emergency Operations Center Checklist-Section 1.4*** and ***Communication Procedures-Section 4.4*.**
- Secure Buildings and Persons:
  - Quickly lock exterior doors and close windows, air vents, and fireplace dampers. Have employees familiar with your building's mechanical systems turn off all fans, heating and air conditioning systems, and clothes dryers. Some systems automatically provide for exchange of inside air with outside air. These systems, in particular, need to be turned off, sealed, or disabled.
  - Close the business or lock the home (encourage persons not to leave, see next bullet point)
  - If there are customers, clients, or visitors in the building, provide for their safety by asking them to stay - not leave. When authorities provide directions to shelter-in-place, they want everyone to take those steps immediately. Do not drive or walk outdoors.
- Telephone:
  - Have in the building call their emergency contacts, then turn on answering systems.
  - Unless there is an imminent threat, ask employees, customers, clients, and visitors to call their emergency contact to let them know where they are and that they are safe.
- Shelter in Place:
  - Close or tape-off all vents in the room used for shelter-in-place.
  - Turn on call-forwarding or alternative telephone answering systems or services. If the business has voice mail or an automated attendant, change the recording to indicate that the business is closed, and that staff and visitors are remaining in the building until authorities inform it is safe to leave.
  - If you are told there is danger of explosion, close the window shades, blinds, or curtains.
  - Gather essential disaster supplies, such as non-perishable food, bottled water, battery-powered radios, first-aid supplies, flashlights, batteries, duct tape, plastic sheeting, and plastic garbage bags.
  - Select interior room(s) above the ground floor, with the fewest windows or vents. The room(s) should have adequate space for everyone to be able to sit. Avoid overcrowding by selecting several rooms if necessary. Large storage closets, utility rooms, pantries, copy and conference rooms without exterior windows will work well. Avoid selecting a room with mechanical equipment like ventilation blowers or pipes, because this equipment may not be able to be sealed from the outdoors.
  - It is ideal to have a hard-wired telephone in the room(s) you select. Call emergency contacts and have the phone available if you need to report a life-threatening condition. Cellular telephone equipment may be overwhelmed or damaged during an emergency.
- Communications:
  - Write down the names of everyone in the room, and call and emergency contact or your business' designated emergency contact to report who is in the room with you, and their affiliation with your business (employee, visitor, client, and customer).
  - Listen to the radio, watch television, or use the Internet for further instructions until you are told all is safe or to evacuate. Local officials may call for evacuation in specific areas at greatest risk in your community.

4.10 Training and Continuing Education Document

- This document covers the emergency procedure activities for NorthWestern Energy (NWE) and Canada Montana Pipeline Company (CMPL) transmission gas operations (inclusive of NWE facilities in Montana, South Dakota and Canada). The document applies to any uncontrolled release or the substantial threat of an uncontrolled release of natural gas without regard to the specific location of the release.As in any emergency situation, the order of priority shall beFirst – the protection of life of both the serviceman and the customer.
  - Second – the stabilization of the incident by controlling or making the situation safe.
  - Third – the conservation of property.
- If a fire exists and natural gas is the fuel source, allow the fire to burn until the source can be controlled or shut off.
- To enter a hazardous atmosphere of blowing gas, a person shall be properly trained in safe procedures, be trained and qualified to wear a self-contained breathing apparatus, and an adequate means of rescue will be available.
- Whenever the public is involved, all activities must be coordinated with civil authorities (police, fire, or emergency response personnel). If civil authorities are involved, they have jurisdiction over any activities that affect the general public.
- With any natural gas incident, evacuate all people and ventilate to reduce the chance of injuries or damage from fire and explosion. When it is necessary to deal with the general public, the police and/or fire departments should be requested to assist with evacuation and crowd control.
- After every qualifying natural gas incident, notification to proper authorities must be made as soon as possible (the National Response Center must be notified within one hour after an incident).

Technical and Regulatory References

- 49 CFR Part 192
- 29 CFR 1910.120
- NWE Safety and Health Handbook
- NWE Gas Distribution O&M Standards
- NWE Electric and Gas Call Tutorials
- CER Onshore Pipeline Regulations
- CSA Z 731 Emergency Preparedness and Response
- CAS Z 662 Oil and Gas Pipeline Systems
- Incident Command Structure

Definitions

- Canadian Montana Pipeline Company (CMPL) – See section 2.7 of O & M Standard 1020
- Company – NWE's employees or contractors working directly under the supervision of NWE.
- Emergency – the uncontrolled escape of a hazardous substance(s) in which human life or property is in jeopardy and prompt summoning of aid is essential.

Emergency Procedure Manual – when a version of the Emergency Procedure Manual has information entered in the appendices for a specific operating area of the Company, it becomes an "Emergency Manual".

- Emergency Procedures Manual Committee Members- *Committee Chair

[redacted]
[redacted]
[redacted]
[redacted]

- Emergency response – a response effort by employees from outside the immediate release area or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an occurrence, which results, or is likely to result, in an uncontrolled release of a hazardous substance. Responses to incidental releases of hazardous substances, where the substance can be controlled at the time of release by employees in the immediate release area or by maintenance personnel, are not considered to be emergency responses within the scope of this document. Responses to releases of hazardous substances where there is no potential safety or health hazard (i.e., fire, explosion, or chemical exposure) are not considered to be emergency responses. The following are examples of situations that a NWE employee may be expected to respond to (not an inclusive list).
  - Flammable gas concentrations that exceed or are likely to exceed 10% ofthe LEL.
  - Situations that are life or injury threatening to employees or the public.
  - Situations that present an oxygen deficient or enriched atmosphere.
  - Conditions that pose a fire or explosion hazard.
  - Situations that require an evacuation of the area.
  - Situations that require immediate attention because of the danger posed to persons in the area.
- Engulfed – when an employee takes his or her entire body into a hazardous atmosphere.
- Hazardous accumulation/atmosphere – an atmosphere containing one or more of the following:
  - The presence of toxic gases in excess of their Permissible Exposure Limit (PEL).
  - The presence of explosive/flammable gases equal to or greater than 10% of the lower flammable limit (LEL).
  - A concentration of oxygen in the atmosphere equal to or less than 19.5% by volume**.**
  - A concentration of oxygen in the atmosphere equal to or greater than 23.5% by volume.
- On-site crew leader/NWE Incident Commander – the on-site crew leader/NWE Incident Commander may or may not be the Unified Incident Commander. When a fire or police department assumes the Incident Commander role, the on-site crew leader/NWE Incident Commander will be the Company's liaison between the Unified Incident Commander and the Company crews.
- Qualified – employees who have received training and equipment to respond to all or part of an emergency.
- Qualifying Incident – An incident that involves the release of gas from a pipeline that results in

*See O&M 1040 for complete list of requirements:

- Responsible area- this may be a Division, District or Area of the company.
- Additional definitions can be found in the O & M Standard 1020

General – Review, Updates, and Distribution of the Emergency Manual

- Review – each supervisor of a responsible area shall annually review the contents of the Emergency Manual with his/her employees. A record of this annual review shall be kept on the Standards SharePoint site under the Emergency Plan library. The record shall include the date, names of those attending, and material covered.
- Updates – the Emergency Manual is to be reviewed annually by the Emergency Manual Committee for updates, or immediately if one of the following occurs:
  - The Emergency Manual fails in an emergency.
  - There are major changes in the system design, construction, operation, maintenance, or personnel that may be responsible for implementing the Emergency Manual.
  - The NWE Safety, Health, and Environmental Services Department or local responding agencies feel changes are needed to improve the usefulness and/or safety of this plan.
  - Distribution – every NWE division or area that has a responsibility for gas distribution/transmission operations will develop and implement an Emergency Manual for their specific operating area. Each Plan will be maintained with current information on the local organization, personnel, facilities, and external entities. The customized material shall consist of detailed information such as local procedures, instructions, drawings, maps, names, addresses, phone numbers, locations, items of material, equipment, and tools needed for the successful handling of natural gas emergencies.

Lines of Authority

- Executive level – the officers for Transmission and Distribution Operations who are responsible for the overall implementation of the Emergency Manual.
- Manager level – the senior level "management" employee in each division and area responsible for the local implementation of the Emergency Manual and any activities associated with this manual. This position is responsible for responding to news media requests and to keep officers informed as appropriate.
- Supervisory level – all supervisors, who have received the 24-hour emergency response training, have the authority to initiate and direct an emergency operation according to their Emergency Manual. Any supervisor initiating a plan shall inform his/her next level of immediately available supervision of the emergency and maintain communications with that supervisor as directed. They are qualified to assume the Incident Commander duties.
- Hazard materials technician level – all personnel who have received the 24-hour emergency response training, qualified to don appropriate protective gear and approach a hazardous atmosphere for the purpose of controlling the leak. These personnel may assume the incident commander duties.
- Hazard materials technician SCBA specialist - Hazardous materials technicians SCBA specialist are individuals who receive training on the use of Self Contained Breathing Apparatus in addition to receiving the same training as a hazardous materials technician.

- All other employees – all personnel who have received the 8-hour first responder training or have sufficient experience to qualify as a first responder may assume first responder/operations level duties.

Public Education

- In order to heighten public awareness and education, NWE will contact the customers and the public by several media means. Bill stuffers, newsletters, radio spots, television commercials, and meetings increase public knowledge about the "Call before You Dig" locating and safety measures concerning the distribution and transmission of natural gas.

Establishing and Maintaining Communication with Fire, Police, Other Public Officials and Media

- Each fire department that may respond to an emergency involving NWE natural gas or propane shall be contacted and offered training on how to handle such emergencies. Contact with all civil authorities and emergency service organizations should be handled as follows:
  - Each division or area will designate a person or persons to ensure these contacts are made.
  - A list of civil authorities and emergency service organizations complete with phone numbers should be maintained in the Emergency Procedures Manual
- Coordination with emergency service agencies
  - Personnel responsible for responding to gas emergencies shall meet with local fire department officials to plan and coordinate the response to gas emergencies.
  - The Emergency Procedures Manual shall contain information for communicating with fire, police, and other public officials in the event of an emergency situation that requires their notification.
- Press releases and news media contacts
  - The local area supervisor or a representative from Corporate Communications is responsible for news relations. The supervisor shall clear all written or verbal statements to the news media with Corporate Communications.

Coordination with Emergency Medical Service

- The standby of emergency medical service personnel is required when NWE employees are entering a hazardous atmosphere. This service should be capable of rendering on-site first aid and transportation to a medical facility that is capable of treating possible injuries to employees. If Company resources are inadequate for the worst anticipated emergency, then outside services should be arranged for as part of establishing an emergency plan.

Prompt and Effective Response to Emergency Notifications

- All gas leaks that could result in a hazardous accumulation of gas or are dangerous to life or health shall be responded to per the guidelines. These include but are not limited to the following situations:
  - Personnel Responding
  - Gas Odor Calls
  - Gas Detected Inside a Gas Facility Building
  - Gas Detected Near a Gas Facility Building
  - Gas Pipeline Ruptures

- Fire Involving a Gas Facility
- Fire Near a Gas Facility
- Explosions
- Natural Disasters

Receiving, Identifying, and Classifying Notices of Events Requiring Immediate Response

- The Call Center/Dispatcher taking the call shall follow the guidelines of the Electric and Gas Tutorial to ensure that all available and relevant information is obtained during the first contact with the caller.

Actions Directed Toward Protecting Employees, the Public, and then Property

- All employees who respond to a gas emergency shall be trained to identify all related hazards, equipped with gas monitors so as not to be engulfed in a hazardous atmosphere, and required to wear the appropriate personal protective equipment for the level of response they make.
- When a Company representative is assigned to provide a first response to a notice of a gas odor, that employee shall take action to:
  - Protect the life of the people affected by the situation by requesting they evacuate the building or area.
  - Protect life and property by shutting off gas meter sets or taking other appropriate action to stop the flow of gas or mitigate the hazard of explosion and fire.

Availability of Personnel, Equipment, Tools, and Materials to Respond to an Emergency

- Each responsible area shall ensure that the tool, equipment, and material list is updated in the area manual.
- The person responding should have for their immediate use the following equipment:
  - A combustible gas indicator or other instrument capable of detecting the presence of natural gas at a concentration of at least one-tenth (10%) of the lower explosive limit.
  - An air-monitoring instrument capable of monitoring the atmosphere for oxygen deficiency where oxygen by volume is less than 19.5 percent oxygen.
  - Wrenches of sufficient size and variety for the person responding to shut off any gas meter stop valve on the gas distribution systems they may be called to.
  - Personal protective equipment including FR clothing, a hard hat, and safety glasses.
  - Keys necessary to gain access to locked Company facilities that may require access during an emergency.
  - Warning ribbon marked “danger do not enter”, or similar markings, and/or other devices needed to barricade off the area of gas release.

Roles – NWE Employees

- Call Center/dispatcher/scheduler – employees who either receive calls directly from the customer and/or dispatch orders to the appropriate responding personnel and document all appropriate information per the Electric and Gas Emergency Tutorials.
- Gas Control Operator – employees who monitor, operate, and control the NWE gas transmission system from the gas control room or backup control room. The roles and responsibilities of a gas control operator are further defined in the Control Room Management

Plan (located on the NWE SharePoint site). Gas control operators address internal and external emergency requirements within the NWE Emergency Procedures Manual.

- First responder operations level – first responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial response for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. Duties may include:
  - Recognizing an emergency and initiating a response by calling any gas supervisor.
  - Remaining at the site and alerting people to keep out of danger of the gas until the police and response team arrive. They shall stay out of the gas and not attempt to shut off the gas by entering a hazardous atmosphere. If it is possible to shut off the gas without entering a hazardous atmosphere and without leaving the site unguarded, they should do so.
- Hazardous material technician – hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they may approach the point of release in order to plug, patch, or otherwise stop the release of a hazardous substance.
- Hazard materials technician/SCBA specialist – a hazardous materials technician/SCBA specialist have the same capabilities as a hazardous materials technician and additionally are certified to don a self-contained breathing apparatus.

  On-scene incident commander (IC) – the first employee on site who is trained as an "incident commander". This person immediately assumes the duties of incident commander until relieved by an individual with a higher level of training or a higher authority.
- Emergency Operations Center (EOC) - Group of people used to support emergency response and recovery planning.

Initial Training Requirements

- Northwestern Energy Employees – all personnel that may be required to implement the Emergency Procedures Manual, either in part or in total, shall be familiar with its contents. In addition, each supervisor over a responsible area shall ensure training is provided to gas employees on the knowledge and skills required to successfully handle emergency situations in a variety of weather conditions and scenarios. Emphasis shall be given to instructions on protecting life first, then stabilize the incident and protect property. All employees who will be involved in emergency response will receive prior training to the degree necessary to perform their duties. An employee will not be requested to perform any task involved with an emergency response unless he/she has received the necessary training, and that training has been refreshed appropriately. Documentation of this training shall be documented through NorthWestern's iAchieve system, Control Room Management Plan, Operator Qualification Plan and SharePoint site.
- The Canada Montana Pipeline Company (CMPL) plans to meet, in person or via phone, with the following groups on a regular basis, not to exceed three (3) years:
  - Regional authorities - Royal Canadian Mounted Police (RCMP) and fire departments.

- In addition, due to the remote location and small facility, CMPL is working with TC Energy to provide Continuing Education for local responders. CMPL participates in and contributes to the program.
- Border Patrol - Because most of the emergency response personnel reside in Montana, CMPL will also meet regularly with border patrol for Canada and Montana to establish relationships and keep updated with new procedures and regulations as they come available.
- CMPL employees are trained with classroom, hands-on exercises, and full scale exercises.

- Call Center/dispatcher/scheduler – shall be trained to receive calls from customers and document all appropriate information per the Electric and Gas Emergency Tutorials.
- First responder operations level – shall receive at least eight hours of training or have sufficient experience to objectively demonstrate competency in the following areas:
  - An understanding of hazardous substances and the associated risks of an incident.
  - An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
  - The ability to recognize the presence of hazardous substances in an emergency (requires a working knowledge of the calibration, operation, and limitations of combustible gas monitors).
  - The ability to identify the hazardous substance.
  - Knowledge of basic hazard and risk assessment techniques (with the use of a combustible gas monitor, the employee can assess the concentration of gas and establish safe boundaries for worker and public safety).
  - Knowledge of the selection and use of required personal protective equipment provided to first responder operational level (including fire resistant clothing, safety glasses, hardhat, work boots, and traffic vests where necessary).
  - An understanding of basic hazardous material terms (includes those terms relevant to natural gas and propane – flash point, specific gravity, LEL and UEL).
  - An understanding of how to perform basic control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available within their unit.
  - An understanding of the relevant standard operating procedures and termination procedures.
- Hazardous materials technicians – shall receive at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas:
  - Knowledge of how to implement the emergency procedures manual.
  - Knowledge of the classification, identification, and verification of known and unknown materials by using field survey instruments and equipment. Includes responding to emergencies involving hazardous substances other than naturals gas (e.g. a tanker with unknown substances releasing a substance near a gas gate/border station).
  - Knowledge of and able to function within an assigned role in the Incident Command System. Includes taking control of an incident and fulfilling the role of the Incident Commander until someone with more training or higher authority relieves the person. Also is able to serve with the Incident Command system as the expert on natural gas when part of a larger response.
  - Knowledge of the selection and use of specialized chemical personal protective equipment

provided to hazardous materials technicians (in addition to the personal protective clothing provided to the first responder operations level) – fire resistant gloves and hoods, self-contained breathing apparatuses, and rescue harnesses. Includes the donning of proper PPE to approach without entering a hazardous atmosphere to shut off the flow of natural gas.
    - Understanding of hazard and risk assessment techniques.
    - Ability to perform advance control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available within the unit. Includes the knowledge and skill to establish and perform rescue operations.
    - Understanding of termination procedures.
    - Understanding of basic chemical and toxicological terminology and behavior.
- Hazardous materials technicians SCBA Specialists – in addition to the above section, shall receive training on the use of self-contained breathing apparatus to enter a hazardous atmosphere to shut off the flow of natural gas.
- On-scene incident commander – shall receive at least 24 hours or training equal to the hazardous materials technician level and also have competency in the following areas:
    - Knowledge of and ability to implement the incident command system.
    - Knowledge of and ability to implement the emergency procedures manual and system.
    - Knowledge and understanding of the hazards and risks associated with personnel working in specialized PPE such as SCBAs.
    - Knowledge of local and state emergency procedures manual.
    - Knowledge and understanding of the importance of decontamination procedures.
    - Refer to Attachment A - "Checklist for On-Scene Incident Commanders".
- Fire department training – each fire department that may respond to an emergency involving natural gas shall be offered training on how to handle and respond to natural gas emergencies. The training session shall include, but not be limited to, those topics listed in Attachment C of this document.
- Exercises — due to its remote location and small pipeline system, CMPL completes the following exercises at the defined intervals.
    - Mutual Emergency Response Training - will attempt to be attended annually
    - Emergency Management Program and Emergency Procedures Manual Review – Will be completed annually
    - Table-Top Situation – Will be completed at minimum every 3 years
    - Full Scale Exercise – Will be completed at minimum every 3 years
- Mutual Emergency Response Training **–** NorthWestern Energy will send at least one individual to TC Energy's full scale exercise. This may be done as long as the training is in a region that is appropriate for NorthWestern to attend. This furthers the relationship between NorthWestern and TC Energy.
- Emergency Management Program and Emergency Procedures Manual Review **–** Shall consist of emergency response individuals and supervisor reviewing the emergency program and plan in a group setting. Signing of an attendance sheet or verification via iAchieve will document this training.

- Table-Top Situation – Efforts will be made to include all parties that have an interest in these training opportunities, which could include but not limited to; local fire departments, Emergency Services, local law enforcement, neighboring utilities and regulatory bodies. Additionally, prior to the table top situation contacts shall be made using the numbers in the emergency manual to verify they are still correct numbers for those specific contacts. Table-Tops may also be completed via web conference and conference call to facilitate participation with other groups. Attendance will be verified though attendance sheets and roll-call during the exercise.
- Full Scale Exercise – Efforts may be made to include all parties that have an interest in these training opportunities, which could include but not limited to; local fire departments, Emergency Services, local law enforcement, neighboring utilities and regulatory bodies.
  - Additionally for exercises performed in Canada, prior to the exercise a group will plan to meet with the Canadian-United States Border Patrol to discuss the exercise and familiarize everyone with the processes and procedures required to make crossing the international border as quick as possible.
- Recordkeeping – the Safety, Health, and Environmental Services Department maintains certification and refresher training records via iAchieve. When training is provided that is intended to be used as refresher training, a copy of the documentation shall be sent to the Safety, Health, and Environmental Services Department. At a minimum, the training record shall contain the following information:
  - The location and date of the training session.
  - A description of the subject matter.
  - A list of all persons attending the training.
  - Name of instructor(s).

Continuing Education

- Refresher training – employees who are trained in accordance with the initial training section above shall receive refresher training of sufficient content and duration to maintain their competencies, or shall demonstrate competency in those areas.

Evaluation of Emergency Procedures

- Each responsible area shall evaluate their response to an event involving natural gas and the implementation of all or part of their emergency plan as described in Section 6 of the EPM. A written report describing the effectiveness of the response and any recommendations for improving future responses shall be prepared, acted upon if appropriate, and placed on file.

Failure Investigation

Each area shall follow procedures established in the NWE O &M Manual for analyzing events and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.

Execution of an Emergency Response

- Initial response
  - The Call Center/dispatcher/scheduler receiving the call shall follow the guidelines of the

Electric and Gas Emergency Tutorial to ensure that all available and relevant information is obtained during the first contact with the caller.

- Any other qualified employee that becomes aware of the need to respond to an "emergency" shall contact their supervisor and notify him/her of the nature of the emergency and the need for an "emergency response team".

- Employee protection
  - All employees who respond to a gas emergency will be trained to identify all related hazards, equipped with gas monitors so as not to be engulfed in a hazardous accumulation of gas, and required to wear the appropriate personal protective equipment appropriate for the level of response they undertake. When a company representative is assigned to provide a first response to a notice of a gas odor, that person shall take action to:
  - Protect the life of the people affected by the situation (including requesting that people evacuate the building or area, if appropriate).
  - Protect life and property by shutting off gas meter sets, or taking other appropriate action to stop the flow of gas, or mitigate the hazard by ventilating and/or removing any sources of ignition.
- Public protection/site security and control
  - If the building or structure is contaminated with natural gas, the public shall be kept away from the building.
  - During an emergency response, the site should be marked off with a warning ribbon or other means used to alert the public of danger and warn them to stay out of the area. The responder shall take into account the drift of gas due to wind and use the gas monitor to determine the boundary (10% LEL) of the gas-contaminated atmosphere (gas cloud). All persons without FR clothing should be kept a safe distance if at all possible. (As a rule of thumb, keep people at least 100 feet beyond the 10% LEL boundary of gas.)
  - When a response involves the general public, the police/fire department should be contacted to assist with evacuations and crowd control.
- Supervisor duties
  - Dispatch a team with appropriate equipment to the site.
- Coordination of emergency medical service
  - Adequate vehicles/drivers to transport injured employees to a medical facility shall be standing by during any response that involves employees in the gas atmosphere. When Company employees trained in first aid or Company vehicles are inadequate for the worst anticipated emergency, then adequate medical standby services should be arranged for prior to employees entering a gas atmosphere.
- Worker safe zone and escape routes

  The on-site crew leader shall designate a location as the "safe zone" for employees to headquarter. The safe zone will be upwind of the gas cloud and far enough away that there is little chance of danger. All response employees shall be instructed to stay at this location while not actively engaged. Standby tools, equipment, safety equipment, first aid kits, vehicles, materials, etc. Should be located at this site, and all employees shall be informed of the location of all resources.

- The on-site crew leader shall establish an emergency escape route from the "spill site" (point of blowing gas), to the safe zone. This route shall be as free of hazards as possible, and every employee shall be shown the route. The team shall all be instructed as to what signals will be used and what conditions will trigger members of the team to evacuate.

- On-site repair
  - All repairs shall be conducted following established rules and protocols.
- Decontamination
  - Upon exiting a hazardous atmosphere, an employee shall loosen their clothing and allow any trapped gas to ventilate to atmosphere.
  - As soon as possible or upon stopping the blowing gas, efforts should be made to adequately ventilate any gas trapped in buildings, structures, or below pavement or frozen ground to insure it does not present a hazard to people or property.
- Evaluation of emergency procedures
  - Routine incidents (incidents such as hit service lines or small mains in open areas, which do not require the use of specialized equipment) – the documentation should include a copy of the gas service order with appropriate comments.
  - Major incidents (incidents that require the use of specialized equipment) – the documentation should include a copy of the service order and a written report covering the topics as described in Section 6 of this document, as applicable.

Crew Resources during an Emergency Response

- If the source of the natural gas can be shut off without entering the gas atmosphere and without leaving the site unguarded, one qualified employee can affect the response.
- If the source of the natural gas can be shut off with only one employee entering the gas atmosphere, and one employee can effectively rescue him/her and control the general public, the response team can consist of as few as two trained employees. Following will be the role of each employee.
  - One employee shall assume the role of "on site crew leader" and take charge of all activities and coordination at the site. The supervisor can elect to be the on-site crew leader. The on-site crew leader shall ensure that the following duties are accomplished:
  - Perform rescue procedures of the hazardous materials technician without entering the contaminated gas atmosphere.
  - Oversee all aspects of safety at the site.
  - Provide first aid assistance as needed.
  - Provide standby transportation to a medical facility.
  - One person shall be assigned to be the "hazardous materials technician SCBA Specialist" role as follows:
  - Wear self-contained breathing apparatus and FR clothing.
  - Perform the necessary work to shut off the gas.
- All other cases require one "on-site crew leader" and the number of trained employees necessary to perform the work and others as needed to provide the following duties (requires a minimum of a three-person team).

- One employee shall be assigned to perform the "on-site crew leader" role and take charge of all activities and coordination at the site. The supervisor can elect to be the on-site crew leader.
- One or more employee will work with a qualified contractor who is capable of preforming the role of "hazardous materials technician SCBA specialist(s)" as follows.
  - Wear self-contained breathing apparatus and FR clothing.
  - Perform the necessary work to shut off the gas while in the contaminated atmosphere.
  - One or more employee will work with a qualified contractor who is capable of preforming the role of rescuer(s) of the hazardous materials technicians SCBA specialist(s). When rescue may require the rescuer(s) to enter the gas atmosphere, he/she must be standing by and suited up in self-contained breathing apparatus and FR clothing.
  - Oversee all aspects of safety at the site.
  - Provide emergency medical service standby as required (at least one person, capable of rendering adequate first aid should be on site and not involved in activities that might render him/her unable to perform first aid duties).
  - Provide emergency medical service standby as required (at least one person, capable of rendering adequate first aid should be on site and not involved in activities that might render him/her unable to perform first aid duties).

Emergency Response Assistance Agreement

- In the event of an Emergency on the Carway Line determine if the Emergency Response Assistance Agreement with TCPL will be implemented. ***Emergency Response Assistance Agreement-Section 4.20***

Fire Department Training

The training session for local fire departments shall include but not be limited to the following subjects.

1) A general description of the location and function of the Company's natural gas facilities in their area. This topic should cover subjects such as operating pressures, city gate functions, compressor stations, valves, meters and regulators.

2) The chemical and physical properties of natural gas, including the following:
   a) Natural gas is lighter than air and will rise.
   b) Natural gas is naturally odorless. Odorant is added but may leach out in some soils.
   c) Combustible limits of a natural gas – between 4.5% and 14.5% (natural gas in air).
   d) The ignition temperature of natural gas is approximately 1000 degrees Fahrenheit.
   e) Natural gas is non-poisonous (note: in some gas production fields, natural gas may contain hydrogen sulfide, which is poisonous; the hydrogen sulfide is removed from natural gas during the initial processing).

3) Odorant is added to natural gas so that the normal person can identify the presence of gas at a minimum concentration of one-fifth (1/5) of the lower combustible limit.

4) Natural gas can displace oxygen in air and cause an oxygen deficient atmosphere. Air and gas monitoring instruments are necessary when responding to any natural gas emergency.

5) Four general types of natural gas emergencies – how to respond:
   a) <u>Gas escaping outside and not burning</u>
      i) Notify NWE – a gas serviceman will respond
      ii) Clear the area
      iii) Close windows and doors in nearby buildings
      iv) Reroute or restrict traffic
      v) Remove or extinguish any open flames and prohibit smoking
   b) <u>Gas escaping outside and burning</u>
      i) Notify NWE – a gas serviceman will respond
      ii) Clear the area
      iii) Allow the natural gas to burn until the source can be shut off
      iv) Prevent ignition of nearby combustibles
   c) <u>Gas escaping inside and not burning</u>
      i) Notify NWE – a gas serviceman will respond
      ii) Clear all occupants from the building
      iii) Turn off gas supply
      iv) Ventilate building by opening windows and doors
      v) Eliminate sources of ignition
      vi) Do not
         (1) allow smoking
         (2) ring doorbell
         (3) operate electrical switches (on or off)
         (4) use the telephone
         (5) use power fans or exhausters
         (6) pull the electric meter

   d) <u>Gas escaping inside and burning</u>
      i) Notify NWE – a gas serviceman will respond
      ii) Clear all occupants from the building

iii) Let the fire burn until the gas has been shut off
iv) Shut off gas at the meter

6) Instructions on how and when to operate gas meter stop valves and fire valves. These instructions shall emphasize that, while they are free to turn off gas valves as they see fit, only authorized NWE representatives can turn gas valves on.

4.11 Handheld/Personal Radio Instructions

Status LED indicator

Color	Flash rate	Meaning
red	● steady	Transmitting
red	✱ slow	Battery low. Recharge or replace as soon as possible.
red	✱ medium	Transmitting at low power
red	✱ fast	Radio is stunned. Radio also emits high-pitched beeps. Contact your dispatcher.
red	✱ two fast flashes	The power-up sequence is complete. Radio also emits two medium-pitched beeps.
green	● steady	Conventional mode: channel busy Trunking mode: a traffic channel has been allocated for a call. Proceed with the call.
green	✱ slow	Radio has access to a trunking system and is ready to make and accept calls
orange	✱ medium	The radio does not have access to a trunking system
orange	● fast	A call has been received

Radio display symbols

The bottom line of the display shows a series of symbols that give additional information on the state of the radio. The following table shows some of symbols you may see on your display.

Symbol	Meaning
▂▄▆	Received signal strength indicator (RSSI): the more bars, the stronger the signal being received by your radio
▭	Flashing: recharge the battery
▮	The battery is fully charged
✉	The radio is in DTMF dialing mode
◀	Monitor is active
‹›	Scrolling is permitted
🔔	There are calls in the call queue
//	The radio is transmitting

Symbol	Name	Function
	PTT key	Press and hold to transmit and release to listen
	Power/volume control	Rotate to turn on the radio and change the speaker volume
	Channel selector	Select and change channels
✓	Enter/menu	Short: select a function, turn a function on/off (menu mode); send a short data message Long: enter/exit a mode or menu
‹	Scroll keys	Scroll through a list of menu options or messages
›		
✕	Clear	Short: cancel, back or delete a single character Long: keypad lock off
	Top key	EMERGENCY key
	Function keys 1 and 2	F1 - Home Group F2 - GroupZone Selct
	Alphanumeric keys	Used to enter letters and numbers

About trunking operation

When your radio is operating on a trunking network, several channels can be shared by a large number of radio users. Your radio communicates with the trunking network on a 'control channel', and the network allocates you a 'traffic channel' when you want to make a call. When your call is complete, the traffic channel can then be used for calls by other radio users on the network.

Checking that the network is available

When your radio has access to a trunked network, the LED slowly flashes green and ▂▄▆ appears in the display. The current control channel may also appear in the display.

If access to the trunked network is lost, the LED slowly flashes orange, and ▂▄▆ disappears.

CHANGING ZONES

1 **Press the F2 key twice; ZON will appear in the upper left of the display**

2 **Use scroll keys to select desired ZONE; the radio will timeout on the selected ZONE**

CHANGING TALKGROUPS

1 Press the F2 key once; GRP will appear in the upper left of the display

2 Use scroll keys until the desired TALKGROUP is selected; the radio will timeout on the selected TALKGROUP

SETTING A HOME GROUP

1 Setup desired ZONE/TALKGROUP

2 Press the F2 key twice; ZON will appear in the upper left of the display

3 Long press GREEN CHECK key until H appears under ZON

SETTING A SCAN LIST

1 Setup desired ZONE/TALKGROUP

2 Press the F2 key; GRP will appear in the upper left of the display

3 Long press GREEN CHECK key until S appears under GRP

MAKING AND CLEARING A TALKGROUP CALL

1 Verify the desired ZONE and TALKGROUP are shown in the display

2 Press the PTT (press-to-talk) key; notice the channel number change and WAIT is displayed until the call is setup

3 When the call is active, a countdown timer will appear in the display

4 When finished with the call, press the RED X key to clear the call

MAKING AND CLEARING A RADIO TO RADIO CALL

1 Enter the 4 digit radio unit ID of the desired radio to call

2 Press the PTT (press-to-talk) key

3 When finished with the call, press the left RED X key to clear the call

MAKING AND CLEARING A PABX CALL

1 Dial the 7 digit company phone extension

2 Press the PTT (press-to-talk) key

3 When finished with the call, press the RED X key to clear the call

TO OPERATE IN CONVENTIONAL MODE

1 Dial to desired conventional channel. 101-104; The channel selector on the top of the radio can select channels 101-104 in positions 1-4 respectively when in conventional mode

2 Press the PTT (press-to-talk) key

3 Press the PTT to talk to other radios that are in conventional mode on the same channel

4 To exit CONVENTIONAL MODE; press F1 KEY or rotate the CHANNEL SELECTOR past position 4

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4.12 Vehicle Mounted Radio Instructions

Symbol	Name	Function
	PTT key	Press and hold to transmit and release to listen
	Volume control	Rotate to change the speaker volume
	On/off key	Turn the radio on or off with a long press
	Left selection key	Action determined by the text above the left selection key, or deletes a dialled character from the display
	Right selection key	Action determined by the text above the right selection key
	Scroll keys	Scroll up and down through a list of menu options or scroll left and right in messages
		Select your Quick Access menu

Tip: If you press and hold the scroll keys, the scroll speed increases.

Function keys	Function keys with programmed options
F1	EMERGENCY
F2	TOGGLE SCAN
F3	HOMEGROUP
F4	TOGGLE EXTERNAL SPEAKER

Radio display symbols

These are some of the symbols you may see on you radio display:

Symbol	Meaning
	Received signal strength indicator (RSSI): the more bars, the stronger the signal being received by your radio
	Transmit: your radio is transmitting
	External alert: outside speaker is turned on
	Scanning: your radio is monitoring a group of channels for activity
	Call queuing: call queuing is active
	Queued call: there are calls in the call queue

Understanding the radio indicators

The status LED indicators and the radio's audible tones—together with the radio display—all combine to give you information about the state of your radio. The most common way the indicators work is described in the following sections.

Status LED indicators

LED	Meaning
red (transmit)	Glowing: your radio is transmitting Flashing: your transmit timer is about to expire, or your radio is stunned
green (receive)	Glowing: you are receiving activity (conventional mode) or your radio is actively in a call (MPT trunked mode) Flashing (conventional mode): you have received a call with valid special signalling, or you have activated monitor or squelch override
amber (scanning or network)	Glowing: your radio is scanning a group of channels for activity (conventional mode) or network service is available (MPT trunked mode) Flashing: your radio has detected activity on a channel, and has halted on this channel (conventional mode) flashing fast: there is no network service available (MPT trunked mode)

CHANGING ZONES

1. Press left select button
2. Use scroll keys to select desired ZONE
3. Use right select button when the desired zone is selected

CHANGING TALKGROUPS

1. Use scroll keys to select desired TALKGROUP
2. Scroll until the desired TALKGROUP is selected
3. After releasing the scroll button, the radio will timeout on the selected TALKGROUP

MAKING AND CLEARING A TALKGROUP CALL

1. Verify the desired ZONE and TALKGROUP are shown in the display

2. On the mic, press the PTT (press-to-talk) key

3. When finished with the call, press the left select button to clear the call

MAKING AND CLEARING A RADIO TO RADIO CALL

1. On the mic, enter the 4 digit radio unit ID of the desired radio to call

2. On the mic, press the PTT (press-to-talk) key

3. When finished with the call, press the left select button to clear the call

Form 3968 08/15

MAKING AND CLEARING A PABX CALL

1. On the mic, dial the 7 digit company phone extension

2. On the mic, press the PTT (press-to-talk) key

3. When finished with the call, press the left select button to clear the call

SETTING A HOME GROUP

1. Use scroll keys to select desired TALKGROUP

2. Use the right select key to select options

3. Use scroll keys to select HOME GROUP

4. Use the right select button to select the highlighted Talkgroup as your HOME GROUP

SETTING A SCAN LIST

1. Use scroll keys to select desired TALKGROUP (Your HOME GROUP is automatically placed into the scan list)

2. Use the right select key to select options

3. Use scroll keys to select ADD TO SCAN

4. Use the right select button to add the highlighted Talkgroup to your SCAN LIST

TO OPERATE IN CONVENTIONAL MODE

1. On the mic, dial to desired conventional channel. 101-104
2. On the mic, press the PTT (press-to-talk) key

3. Press the PTT to talk to other radios that are in conventional mode on the same channel

4. To exit CONVENTIONAL MODE; press F3 button or power cycle the radio

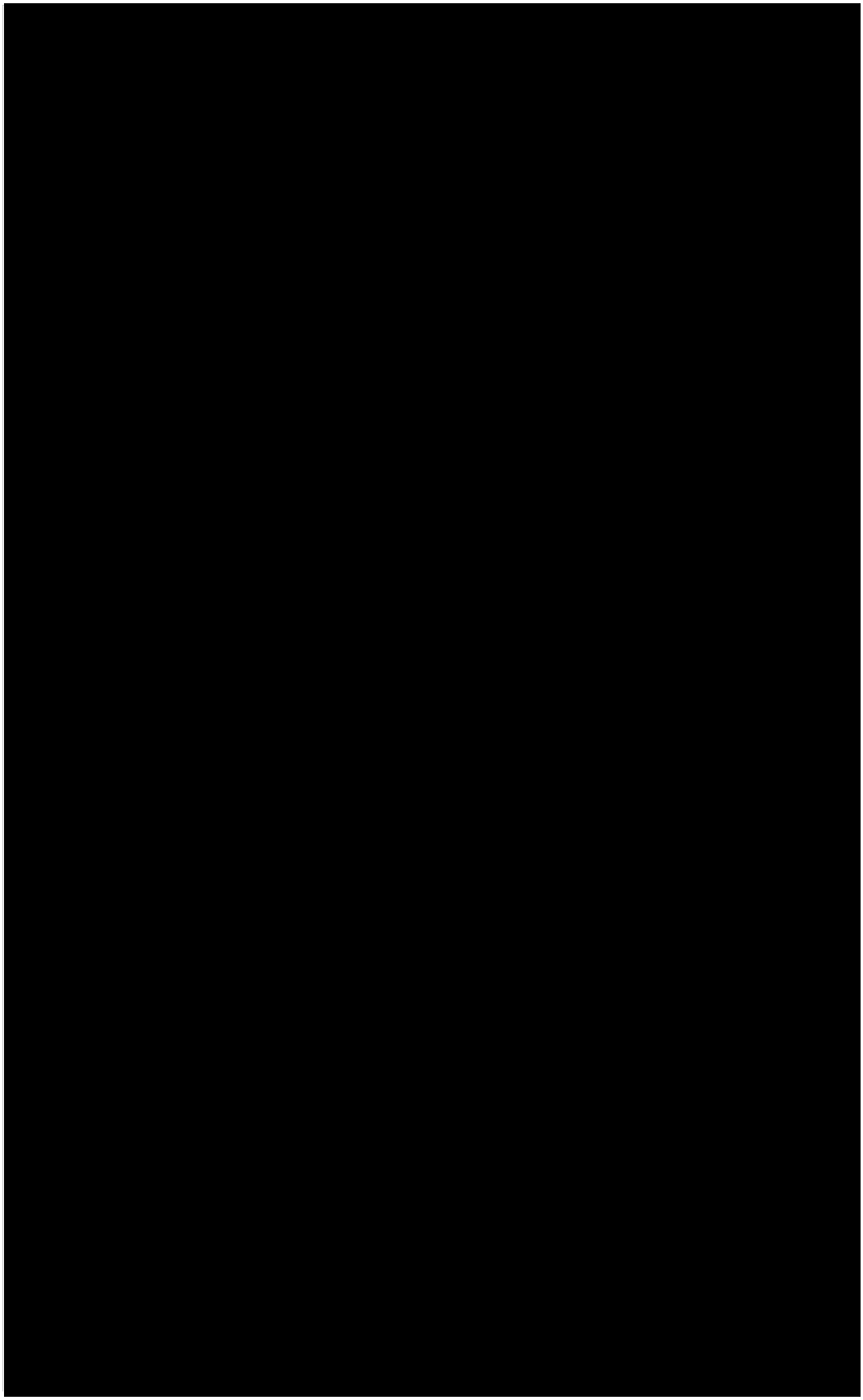
4.13 Emergency Shutdown Procedure and Schematics

Basic Bypass and Re-Reroute Procedures

- Basic bypass and re-route procedures are located in the images below. Any other procedure more complicated than a basic bypass or re-route will require consultation with the Gas Transmission & Storage (GTS) Engineering Department. A specific procedure for each shutdown will be developed by the EOC and IC, in conjunction with the GTS Engineering Department. See ***GTS Qualified Personnel and Contact List-Section 5.2*** for the Engineering Department's contact information.

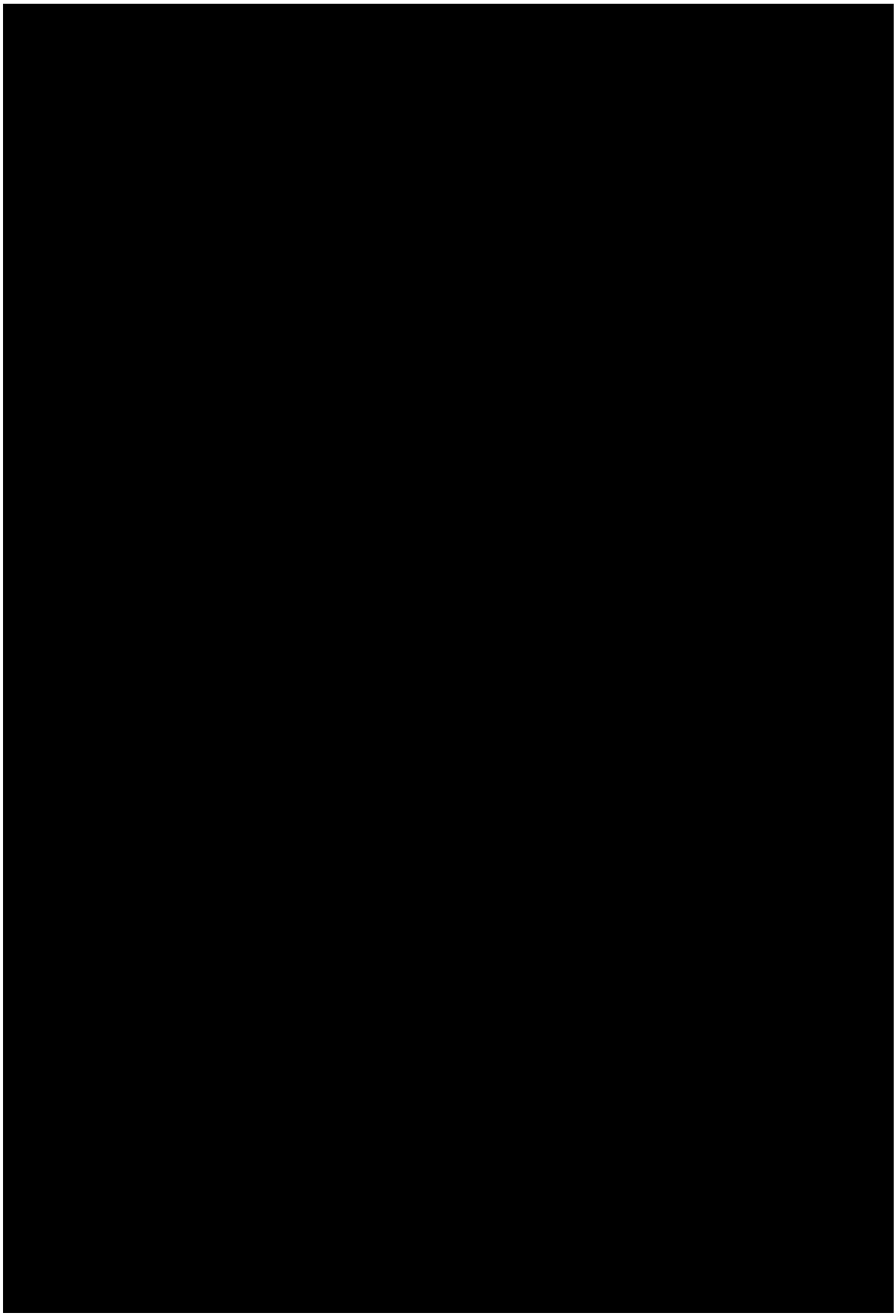
Shutdown Procedures

- Shutdown Procedures will be at the direction of Gas Operations and a specific procedure for each shutdown will be developed by the EOC and IC, in conjunction with the GTS Engineering Department. See ***GTS Qualified Personnel and Contact List-Section 5.2*** for the Engineering Department's contact information.
    - Note that all Gate Stations and Compressor Stations have shut down and start up procedures and schematics at each site.



4.14 Canadian [redacted]

[redacted]



4.15 Area Maps General Information

CMPL/NorthWestern Energy utilizes an ESRI GIS system. Access to this system is though the company intranet following these steps. [redacted]

- Or can be found at the following link: [redacted]
- Employees have access to the site 24/7, 365 days a year. Any employee can print or PDF any segment of the system. Contractors will be issued paper maps from the local area personnel.
- Please reference the following CMPL drawings and maps for the 16" pipeline and NorthWestern Energy's GIS system (included as ***Canadian Schematic Drawings-Section 4.14***, to this Emergency Procedures Manual):

[redacted]

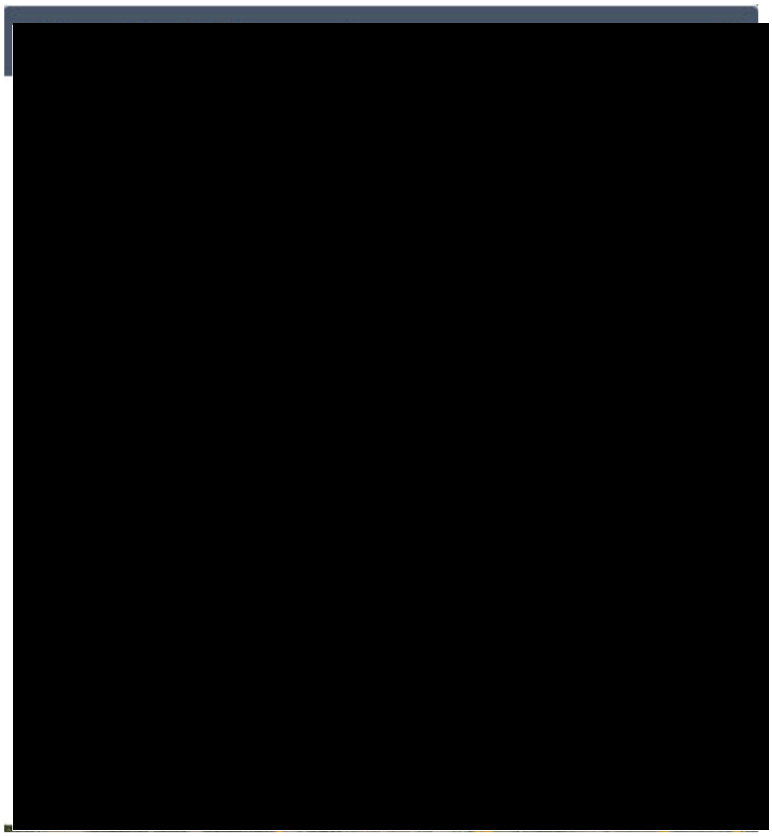
[redacted]

4.16 How to use GPS in the GIS System

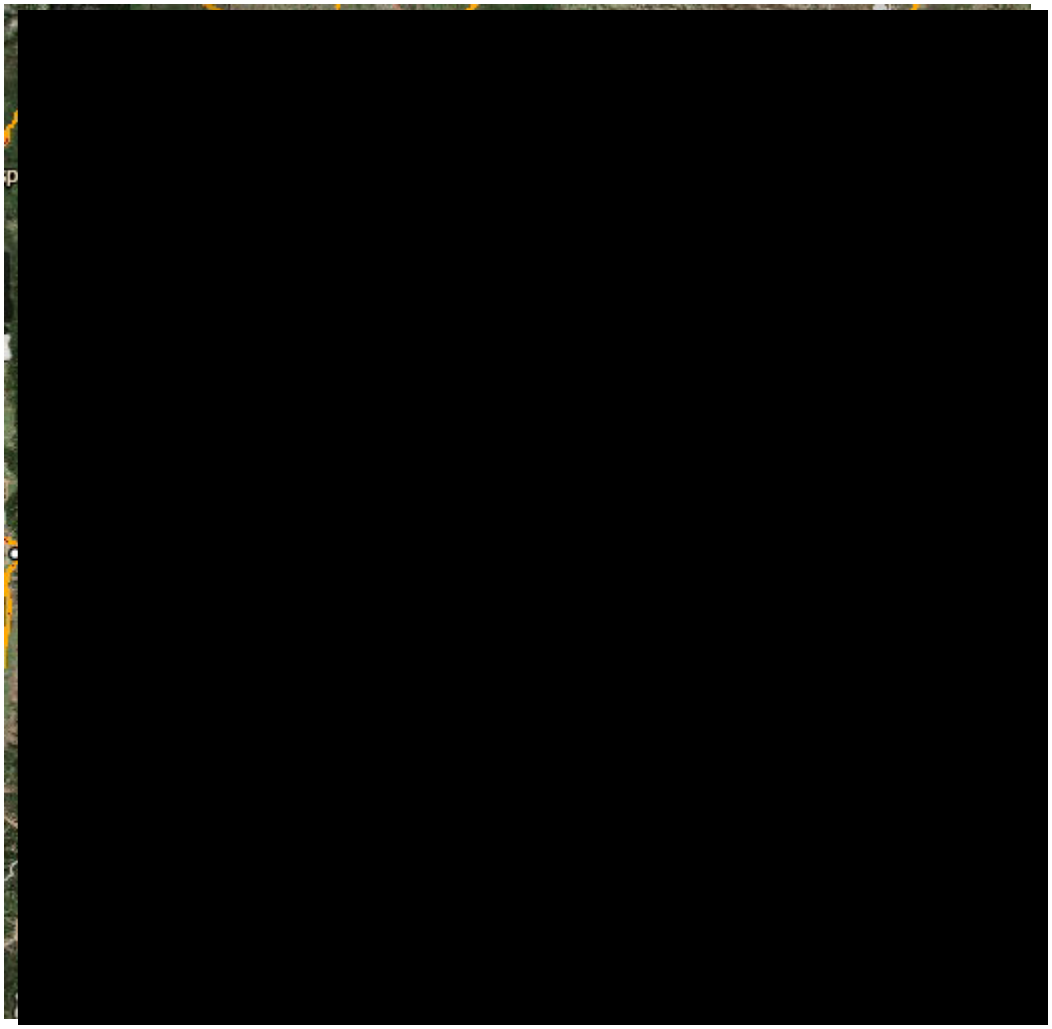
- Log into GIS

- In GIS -

- Click on the XYZ button below the Esri World Geocoder. To bring up the window below:



- Click on the settings button below the Input window.



- Click the drop down and choose “DMS” and click apply.
- Enter the coordinates shown on the compass of an iPhone as follows: [redacted]
- Click on the zoom button in the coordinate conversion window.
- You will see a “pin” shown for the location entered in the window.

4.17 Management of Threat and Emergency Response Risk Table

Management of Threat Overview

The Pipeline Research Committee International has analyzed gas pipeline incident data and classifies threats to a pipeline's integrity into nine general areas. CMPL has identified an additional threat to a pipeline's integrity – intentional property damage. This includes damaged caused by vandalism or terrorism. The threats are listed below:

- External Corrosion
- Internal Corrosion
- Stress Corrosion Cracking
- Manufacturing Related Defects
- Construction Related Defects
- Equipment Failure
- Third Party Damage
- Incorrect Operations
- Weather/Outside Force Related
- Intentional Property Damage

CMPL has conducted a formal, qualitative risk assessment for the above threats. The CMPL hazard assessment has identified that the highest priority threat, for the CMPL pipeline are intentional property damage, followed by weather or outside force related issues (specifically earthquake, flood or landslide) and third party damage. All other threats are classified as low impact and low probability, and are not included in this Emergency Procedures Manual.

The attached table takes each risk noted and assigns them probability and potential to determine the ultimate risk for the threats identified for the system.

The pipeline is located in cultivated land, with road crossings and waterway crossings the only other factors considered. There are no populated areas, High Consequence Areas, etc.

One aggravating factor is the remoteness of the pipeline. Response time could be 6 to 12 hours for our NorthWestern Energy crews. Therefore, CMPL has an Emergency Response Assistance Agreement with TCPL.

4.17 Emergency Response Risk Table

POSSIBLE THREAT	PROBABILITY	IMPACT	MITIGATION	COMMENTS
External Corrosion	Very Low	High	Yes	Active Cathotic Protective Monitoring
Internal Corrosion	Very Low	High	Yes	Transmission Quality Gas with no moisture or acid
Stress Corrosion Cracking	Very Low	High	Yes	Annual line patrol, Continuing Surveillance, Continuous SCADA monitoring of flows/pressures
Manufacturing Related Defects	Very Low	High	Yes	Inspection of Construction Materials
Construction Related Defects	Very Low	High	Yes	OQ and monitoring of construction activities by Engineering staff
Equipment Failure	Low	High	Yes	Continuous SCADA monitoring of flows and pressures
Third Party Damage (such as road crossings/waterway	Moderate	High	Yes	Alberta One-Call Member
Incorrect Operations	Low	High	Yes	Continuous SCADA monitoring of flows and pressures
Weather/Outside Force Related	Moderate	High	Yes	Annual line patrol, Continuing Surveillance, Continuous SCADA monitoring of flows/pressures
Intentional Property Damage	Moderate	High	Yes	Annual line patrol, Continuing Surveillance, Continuous SCADA monitoring of flows/pressures

4.18 Safety Data Sheet for Natural Gas

Safety Data Sheet for Natural Gas

The following sheet is a NorthWestern Energy produced and maintained Safety Data Sheet for Natural Gas:

Section 1 – Chemical Product And Company Information	
Product Name: Natural Gas	Manufacturer/Distributor: NorthWestern Energy 11 East Park Butte, MT 59701
Synonyms: Gas plant natural gas Natural gas – dry	**Emergency Phone Number:** **1-406-782-6250**
Chemical Family: Natural Gas Chemical Formula: Mixture Product Code: None	MSDS Information: 1-406-497-2418 MSDS Revision Date: 01-24-06
Information Supplied By: Randy Nicholls, Certified Industrial Hygienist	

Section 2 – Composition/Information On Ingredients		
Product Information: Natural gas – dry (CAS #68410-63-9) is a complex combination of hydrocarbons (predominantly C1 through C4) separated from natural gas. Consists primarily of methane and ethane.		
Components	**Percent Range**	**CAS Number**
Methane	70.00 to 99.00	74-82-8
Ethane	1.00 to 12.00	74-84-0
Carbon Dioxide	0.50 to 5.00	124-38-9
Nitrogen	0.10 to 18.00	772737-9
Propane	0.10 to 8.00	74-98-6
t-Butyl Mercaptan	Trace	75-66-1

Exposure Guidelines	**Limit**	**Type**	**Source**
Natural gas (product)	None established – considered a simple asphyxiant by ACGIH		
Methane	None established – considered a simple asphyxiant by ACGIH		
Ethane	None established – considered a simple asphyxiant by ACGIH		
Carbon dioxide	5000 ppm	8 hr. TWA	ACGIH

	30000 ppm	STEL	ACGIH
	10000 ppm	8 hr. TWA	OSHA
	30000 ppm	STEL	OSHA
Nitrogen	None established – considered a simple asphyxiant by ACGIH		
Propane	2500 ppm	8 hr. TWA	ACGIH
	1000 ppm	8 hr. TWA	OSHA
Mercaptan	Not applicable in trace quantities		

Section 3 – Hazards Identification

Emergency Overview

Natural gas – dry is a colorless gas under pressure stenched with a foul smelling odorant.
Natural gas – dry is extremely flammable and explosive. Keep away from heat, sparks, and open flames.
At high concentrations, this product is a simple asphyxiant, which displaces oxygen from the breathing atmosphere.

OSHA Warning Label

Danger!

Extremely Flammable

Gas Under Pressure

Potential Health Effects

- Eye: Natural gas is generally non-irritating to eyes. Pressurized gas can cause mechanical injury to the eye.
- Skin: Natural gas is generally non-irritating to skin.
- Inhalation: Natural gas acts as an anesthetic at high concentrations, producing dizziness, headache, incoordination, and narcosis; extremely high concentrations can cause asphyxiation by exclusion of oxygen.
- Ingestion: Ingestion is not likely.
- Carcinogen Listing: No data available.
- Medical Conditions Aggravated By Exposure: No data available.

Section 4 – First Aid Measures

First Aid:

- Eye: Call a physician if symptoms or irritation occur.
- Skin: Call a physician if symptoms or irritation occur.
- Inhalation: Move person to fresh air if not breathing or if no heartbeat, give artificial respiration or cardiopulmonary resuscitation (CPR). Immediately call a physician.
- Ingestion: Ingestion is not likely. If swallowed, immediately call a physician.
- Notes to physician: Treat symptomatically.

Section 5 – Fire Fighting Measures

Flammable Properties:

- Flash Point: -218 degrees Centigrade
- Auto ignition Temperature: 527 degrees Centigrade
- Lower Explosive Limit (LEL): 3.2% volume in air
- Upper Explosive Limit (UEL): 14.0 % volume in air

Fire and Explosion Hazards:

- This product has been determined to be a flammable gas and should be handled accordingly. For additional fire related information, see NFPA 30 or North American Response Guide 115.

Extinguishing Media:

- Class B fire extinguishing media such as carbon dioxide or dry chemical can be used for small fires. Firefighting should be attempted only by those who are adequately trained and equipped with proper protective equipment.

Special Fire Fighting Instructions:

- Stop the flow of gas and allow fire to burn out. Extinguishing the flame before shutting off the supply can cause the formation of explosive mixtures. In some cases, it may be preferred to allow the flame to continue to burn. Keep the surrounding area cool with water spray and prevent further ignition of combustible material.

Section 6 – Accidental Release Measures

Keep public away. Shut off source, if possible to do so without hazard. Advise local and state emergency services agencies, if appropriate.

Section 7 – Handling and Storage

Product should be handled and stored in accordance with industry accepted practices. Comply with all applicable OSHA, NFPA, and consistent local safety requirements. Use appropriate grounding and bonding practices. Store in properly closed containers that are appropriately labeled. Do not expose to heat, open flames, strong oxidizers, or other sources of ignition. Avoid repeated and prolonged skin contact. Exercise good personal hygiene including removal of soiled clothing and prompt washing with soap and water.

Section 8 – Exposure Control/Personal Protection

Engineering Controls:
- Local or general exhaust required if used in an enclosed area in order to keep concentrations below the lower explosive limit.

Respiratory Protection:
- Use atmosphere supplying respirators in the event of oxygen deficiency, when material produces vapors that exceed permissible limits or excessive vapors are generated. Observe respirator protection factor criteria cited in the latest edition of ANSI Z88.2. Self-contained breathing apparatus should be used for firefighting.

Skin Protection:
- No data available.

Eye Protection:
- Goggles or face shield may be needed when handling pressurized gases.

Other Protective Equipment:
- Use explosion proof equipment; static free clothing; non-sparking tools.

Section 9 – Physical and Chemical Properties

Appearance/General Information: Colorless, odorless, and tasteless gas. Gas has no odor detection level unless mercaptan odorant has been added. Gas is less dense than air. Burns with a pale, faintly luminous flame. Soluble in alcohol, ether, hydrocarbon, and other organic solvents. Packed as a gas under pressure. Sudden release of pressure or leakage may result in generation of a large volume of highly flammable/explosive gas.

Physical State: Compressed gas Vapor Pressure (kPa): Not applicable Vapor Density (air = 1): 0.55 to 0.62 Specific Gravity (H2O = 1): 0.37 to 0.50 as liquid Water Solubility: 0.6 ml in 1 g ethyl alcohol at 20 °C	Boiling Point Range: -161.4 to –41.7 °C Freezing/Melting Point Range: -182.6 °C Volatile Component (% Vol): 100% pH: Not applicable Odor (with mercaptan): Rotten egg smell.

Section 10 – Stability and Reactivity

- Stability: The material is stable at 21.1°C, 760 MM pressure.
- Conditions to avoid: Sources of heat and/or ignition.
- Hazardous decomposition products: Carbon monoxide, carbon dioxide.
- Incompatible materials: Strong oxidizers (e.g. chlorine), mineral acids.
- Hazardous polymerization: Will not occur.
- Conditions to avoid: Product is considered stable under normal handling conditions.

Section 11 – Toxicological Information

At extremely high concentrations and excessive exposure conditions, components of natural gas may produce cardiac sensitization.

Section 12 – Ecological Information

Most components of natural gas are lighter than air and should dissipate rapidly in unconfined areas.

Section 13 – Disposal Considerations

Preferred method of disposal is burning as a vapor in a properly designed flare. Special care must be taken to ensure complete dissipation of gas below the lower explosive limit.

Section 14 – Transportation Information

Per DOT 49 CFR 172.101

- Proper shipping name: Natural gas, compressed
- DOT classification (Hazard Class): 2.1
- DOT identification number: UN 1971
- Label: Flammable Gas

Section 15 – Regulatory Information

EPA Regulations

- RCRA 40 CFR: Not listed.
- CERCLA 40 CFR: Not listed.
- SARA 40 CFR 372.65: Not listed.
- SARA EHS 40 CFR 355: Not listed.
- TSCA: Listed.

Section 16 – Other Information

NFPA Classification		HMIS Classification		Hazard Rating	
Health	1	Health	1	0	Least
Fire	4	Fire	4	1	Slight
Reactivity	1	Reactivity	1	2	Moderate
Other	-	Other	-	3	High
				4	Extreme

4.19 Canadian Role of Government Entities

Canada Energy Regulator (CER)

- The CER's top priority in any emergency is to make sure that people are safe and secure, and that property and the environment are protected. The CER will require that all reasonable actions are taken to protect employees, the public, and the environment.
- When a serious incident occurs, CER inspectors will attend the site to oversee Canada Montana Pipeline Company's (CMPL) immediate response. These inspectors reside in the local area and are available to respond quickly to emergencies; they will be dispatched by the CER Emergency Operations Center as soon as it is notified of an emergency. The Canada Energy Regulator will be the lead regulatory agency on site, and is required to approve the restart of the pipeline when repairs are complete. The CER may also verify that CMPL conducts adequate and appropriate cleanup and remediation of any environmental effects caused by the incident.
- In addition, the Transportation Safety Board of Canada (TSB) may investigate the pipeline transportation accident to identify safety deficiencies and make safety recommendations.
- As the lead regulatory agency, the CER may:
- Monitor, observe, and assess the overall effectiveness of the Company's emergency response in terms of:
  - Emergency management
  - Safety
  - Security
  - Environment
  - Integrity of operation and facilities
  - Energy supply
- Approves the restart of the pipeline.
- Investigates the event, either in cooperation with the TSB of Canada (TSB) under the Canada Labor Code, or as per the Canada Energy Regulator Act or Canada Oil and Gas Operations Act (whichever is applicable).
- Inspects the Pipeline.
- Examines the integrity of the Pipeline.
- Inspects the pipeline and examines its integrity.
- Requires appropriate repair methods to be used.
- Requires appropriate environmental remediation of contaminated area to be conducted.
- Coordinates stakeholder and Aboriginal community feedback regarding environmental cleanup and remediation.
- Confirms that the company is following its Emergency Procedures Manual commitments, plans, procedures, and CER regulations.

Transportation Safety Board of Canada

- The TSB of Canada is an independent agency created to advance transportation safety to advance transportation safety through the investigation of occurrences in the pipeline mode of transportation. The *Canadian Transportation Accident Investigation and Safety Board Act* provide the legal framework governing TSB activities. The TSB's mandate is to advance transportation safety related to pipelines by:
- Conducting independent investigations, including public inquiries when necessary, into selected transportation occurrences in order to make findings as to their causes and contributing factors

- Identifying safety deficiencies that may have contributed to the transportation occurrence
- Making recommendations designed to eliminate or reduce any such safety deficiencies
- Reporting publicly on the investigations and their findings
- To instill confidence in the public regarding the transportation accident investigation process, it is essential that an investigating agency be independent and free from any conflicts of interest when investigating accidents, identifying safety deficiencies, and making safety recommendations. As such, the TSB is an independent agency, separate from other government agencies and departments that reports to Parliament through the President of the Queen's Privy Council for Canada.
- There are three main phases of a TSB investigation: the Field Phase, the Post-Field Phase and the Report Production Phase.

Field Phase:

Once the decision has been made to investigate an occurrence, an Investigator-in-Charge (IIC) is appointed and an investigation team assembled. The field phase can last from one day to several months. During the field phase, team members generally:

- Secure and examine the occurrence site
- Examine the equipment, vehicle, or wreckage
- Interview witnesses and company and government personnel
- Collect pertinent information
- Select and remove specific wreckage items for further examination
- Review documentation
- Identify potential unsafe acts and unsafe conditions

Post-Field Phase:

The field phase can last from one day to several months. During the field phase, team members generally:

- Examine all pertinent company, vehicle, government, and other records
- Examine selected wreckage in the laboratory and test selected components and systems
- Read and analyze recorders and other data
- Create simulations and reconstruct events
- Review autopsy and toxicology reports
- Conduct further interviews
- Determine the sequence of events
- Identify safety deficiencies

Report Production Phase:

The TSB of Canada reviews the initial draft investigation report, which may be approved, amended, or returned for further staff work. Once the draft report is approved, a confidential draft report is sent to persons and companies whose interests may be affected by the report and who are most qualified to comment on its accuracy. They then have the opportunity to dispute, correct, or contradict information that they believe is incorrect or unfairly prejudicial to their interests.

- This process is intended to ensure procedural fairness and the accuracy of the Board's final report. The Board considers all representations (comments) and will amend the report if required. Once the final report is approved, it is prepared for release to the public.
- In making its findings on the causes and contributing factors of a transportation occurrence, the TSB does not assign fault or determine civil or criminal liability, and no finding should be construed as doing so. However, the TSB will fully report on the causes and contributing factors,

even if fault or liability might be inferred from the findings. The findings are not binding on the parties to any legal, disciplinary, or other proceedings.

Emergency Services and Emergency Services First Responders

- Emergency Services and First Responders play a critical role in responding to Natural Gas Pipeline Emergencies. Their role is also critical to assisting CMPL mission of protecting the public, the environment and property or assets during an emergency.
- Emergency Services and Emergency Services First Responders may be requested to assist CMPL in the following roles or tasks (when applicable):
  - Communicate the emergency situation to those in proximity of the incident.
  - Provide medical attention to those needing it
  - Contact municipal representatives
  - Provide firefighting protection units
  - Stand up an Emergency Services Incident Command System or assist in Canada Montana Pipeline Company's Incident Command System
  - Notify Emergency Management Coordinators and/or Disaster Relief Agencies
  - Provide evacuation services
  - Traffic management and/or road closures
  - Security and/or cordoning of areas around the Incident Site
  - Request mutual aid from neighboring provinces, local governments or federal agencies

4.20 Emergency Response Assistance Agreement

EMERGENCY RESPONSE ASSISTANCE AGREEMENT

This Agreement made as of the 24 day of November, 2020 ("**Effective Date**")

BETWEEN:

TRANSCANADA PIPELINES LIMITED., a corporation duly incorporated under the *Canada Business Corporations Act*, havingits head office at 450 - 1 Street SW, Calgary, Alberta ("**TCPL**")

AND:

CANADIAN-MONTANA PIPELINE CORPORATION,

A corporation organized under the laws of Province of Alberta,Canada ("**CMPL**")

AND:

NORTHWESTERN CORPORATION d/b/a NorthWestern Energy, a corporation existing under the laws of Delaware, UnitedStates of America ("**NorthWestern**")

(Each individually, a "**Party**" and collectively the "**Parties**")

WHEREAS:

A. TCPL, through an Operating Agreement with its wholly-owned subsidiary NOVA Gas Transmission Ltd. ("**NGTL**"), operates NGTL's natural gas pipeline system ("**NGTL System"**) which includes NGTL's Waterton Montana Lateral in the province of Alberta;

B. TCPL is responsible for the NGTL System's day-to-day operational planning, including emergency preparedness and response;

C. CMPL, a fully-owned subsidiary of NorthWestern, owns and operates approximately [redacted]

D. The Carway Line is connected to NGTL's Alberta Montana Sales Meter Station located in NE 11-1-26 W4M, which is part of the NGTL System and located on NGTL's Waterton Montana Lateral;

E. Unforeseen or imminent events requiring prompt co-ordination of resources and special communications in order to protect health, safety, or welfare of people, or to avoid or mitigate damage to property or the environment ("**Emergency"**) may occur that may have some impact on or arise from operation of the Carway Line;

F. The Parties endorse, practice and implement the Incident Command System in their respective emergency preparedness and response;

G. CMPL does not currently maintain employees in Canada and has requested that TCPL provide CMPL with emergency response-related assistance in the event of an Emergency on the Carway Line as may be required fromtime to time;

AND THEREFORE, in consideration of the premises and the mutual covenants and agreements herein contained, the Parties agree as follows:

Scope:

1. Emergency response assistance that may be provided by TCPL to CMPL on the Carway Line is subject to theterms and conditions contained in this Agreement ("**Emergency Response Assistance**").
2. The Parties agree that all schedules to the Agreement form part of the Agreement. In the event of a conflictbetween this Agreement and the schedules, this Agreement takes priority.
3. This Agreement does not impose any binding obligation on TCPL to provide Emergency Response Assistanceto CMPL. The Parties agree that the Agreement reflects TCPL's intention to voluntarily provide such assistance at TCPL's sole discretion. At all times and in all cases, TCPL shall be entitled,

in its sole discretion, either upon receiving a request for Emergency Response Assistance from CMPL to decline such request or if accepted, at any time thereafter, cease Emergency Response Assistance and withdraw any or all TCPL personnel or equipment deployed.

4. Any human or other resources (equipment) provided by TCPL to CMPL as part of any Emergency ResponseAssistance shall only be provided, implemented, or operated strictly within the borders of Canada and the province of Alberta.
5. Nothing in this Agreement relieves CMPL from any obligation or other commitment to deploy CMPL representatives in response to an Emergency on the Carway Line or to maintain or further develop its level ofemergency preparedness (including liaison and continuing education with local first response agencies) or emergency response capacity for the Carway Line's operation as required by law or otherwise.

Implementation of Emergency Response Assistance

6. Subject to Section 3 and Section 9, Emergency Response Assistance provided by TCPL shall be generally guided by the model of notification and response described in and attached to this Agreement as **SCHEDULE "B"** and shall adhere to those emergency response-related processes detailed in the TC Energy Emergency Management Corporate Program Manual.
7. Upon receiving Emergency Response Assistance from TCPL, CMPL shall make all reasonable arrangementsto ensure that the Emergency Response Assistance period is as short in duration as practicable and shall not belonger than seven (7) days, unless otherwise agreed to by the Parties in writing.
8. In the event Emergency Response Assistance is provided to CMPL, TCPL personnel shall at all times continue to be employees of TCPL and shall at no time and for no purpose be deemed to be employees, contractors oragents of CMPL. Notwithstanding the foregoing, TCPL personnel will, while responding to a request from CMPL for Emergency Response Assistance, be subject to the reasonable direction of CMPL.
9. In the event Emergency Response Assistance is requested by CMPL, CMPL shall make all applicable site-specific safety procedures and safety hazards known to TCPL personnel as soon as possible.
10. During any Emergency Response Assistance provided by TCPL, TCPL personnel shall be equipped with anduse personal protective equipment that is normally used by TCPL personnel in comparable situations, such personal protective equipment to be supplied by TCPL.

Liability, Indemnity, and Insurance

11. TCPL or any of its affiliates or subsidiaries shall not be liable to CMPL or any of its affiliates or subsidiaries for any loss or damage suffered by CMPL whatsoever arising from or as a result of any act, error or omissionby TCPL in providing Emergency Response Assistance, or declining to provide or withdrawing EmergencyResponse Assistance, except where caused by the gross negligence or willful misconduct of the IndemnifiedParties (as defined below).
12. CMPL and NorthWestern shall be liable to and shall indemnify and hold harmless TCPL, its representatives, directors, officers, employees, contractors and agents and each of TCPL's affiliates and subsidiaries and their respective representatives, directors, officers, employees, and contractors (collectively the "**Indemnified Parties**") from and against any and all claims, demands, losses, costs, legal fees (on a solicitor and client basis), damages, suits or proceedings (collectively, "**Claims**") which the Indemnified Parties may sustain, pay, incur or suffer as a result of, or arising in any manner directly or indirectly, out of this Agreement or the provision of Emergency Response Assistance, except where the Claim is caused by the gross negligence or willful misconduct of the Indemnified Parties.
13. In the event any Claim is made or suit or action is filed against Indemnified Parties alleging liability for which CMPL or NorthWestern are required to provide indemnification to TCPL, TCPL shall

promptly notify CMPLand CMPL or NorthWestern, at their sole cost and expense, shall settle, compromise or defend the same. TCPL shall have the right, if it so elects, to approve any settlement or compromise, or participate in any suchdefence. TCPL shall cooperate with CMPL and/or NorthWestern's reasonable efforts to investigate, defend and settle the Claim or lawsuit.

14. Without in any way limiting the liability of either Party, and subject to paragraph 15, TCPL and CMPL shallcarry with an insurance company or companies the following insurance with limits not less than those prescribed below to cover any matters arising out of or relating to, directly or indirectly, the performance ofthis Agreement:

a) workers compensation insurance covering all employees engaged to the limits required by the laws of the Province of Alberta, or maintain worker's compensation or employer's liability insurance in the amount of CDN $5,000,000.00;
b) automotive liability insurance covering all motor vehicles owned, leased, or licensed by the respective Party covering the accidental injury or death of one or more persons or damages to or destruction of property as the result of one accident or occurrence with a limit of liability in the amount of CDN $3,000,000.00;
c) commercial general liability insurance in the sum of CDN $5,000,000.00 including sudden andaccidental pollution coverage; and,
d) all risk property insurance covering all loss for damage to property owned, leased, or rented by theParty, including tools and equipment (not including licensed vehicles).

Upon the request of either Party, each Party who receives such request shall provide a certificate of insurance evidencing the respective insurance policies required under this Agreement. All insurance requirements apply to the Parties and their respective contractors and subcontractors with respect to this Agreement.

15. Insurance policies held by either Party or their respective parent company may satisfy the requirements set out in paragraph 14 above provided that the Party is a named insured under the policy of the respective parent company. Subject to any statutory requirements, any Party may self-insure up to $2,000,000 of the policy limits set out in Section 14(a) and (c) and up to $1,000,000 of the policy limits set out in Section 14(b) and (d).

Costs of Emergency Response Assistance

16. CMPL shall reimburse TCPL for any and all of TCPL's costs and expenses incurred in providing any Emergency Response Assistance including, without limiting the generality of the foregoing:
    a) salaries and wages;
    b) use of equipment, materials and supplies;
    c) transportation; and
    d) other additional and reasonable costs as determined between the Parties.
17. TCPL shall invoice CMPL for all such costs and expenses incurred in Canadian dollars (CDN) and CMPL shall promptly pay all invoices received, subject to its right to request reasonable written documentation in support of invoices before providing TCPL any reimbursement.
18. TCPL shall, to the extent reasonable, keep all timesheets and other records related to personnel or equipment utilized or provided as Emergency Response Assistance as may be necessary in order to verify amounts invoiced under Section 16.

Conditions Precedent

19. Prior to TCPL providing any Emergency Response Assistance to CMPL, CMPL will provide TCPL the following to TCPL's satisfaction:
    a) copies of all emergency response plans developed and/or amended by CMPL as a result of this Agreement;
    b) copies of any agreement or arrangement similar to this Agreement, between CMPL and other

pipelineoperators;

c) copies of all valid international work permits for CMPL employees to enter Canada for purposes of emergency response, or written confirmation that CMPL has reviewed and will abide by relevant and applicable sections of Transport Canada's Guide for Cross-Border Emergency Response in relation to its own preparedness to respond to an Emergency on the Carway Line;

d) copies of correspondence to local Canadian emergency response agencies, including but not limited to fire departments and other emergency services or authorities having jurisdiction over the Carway Line, advising of this Agreement and any changes to CMPL's existing emergency response plans as a result; and

e) confirmation of TCPL's access to all lands required to facilitate Emergency Response Assistance, and copies of correspondence to any owners of land traversed by the Carway Line, or adjacent landownersadvising of this Agreement.

Conditions Subsequent

20. During the term of the Agreement CMPL shall provide prompt written notice to TCPL of any of the following:

a) any decision by CMPL to staff and maintain employees in Canada that could manage or contribute to CMPL's response to an Emergency on the Carway Line;

b) any application to a regulatory authority having jurisdiction over the Carway Line to materially alter its operations, including additions or expansions;

c) any safety order, inspection report, notice or similar document received by CMPL from any regulator or other authority having jurisdiction relating to the integrity or ongoing safe operation of the Carway Line; and

d) CMPL's awareness of sustained abnormal operating conditions on the Carway Line.

Termination

21. Either Party may terminate this Agreement upon providing forty-five (45) days prior written Notice in accordance with Section 24 below. Notwithstanding such termination, the obligations under Section 11, 12and 13 shall survive.

Governing Law and Dispute Resolution

22. This Agreement shall be governed by and construed in accordance with the laws in force and applicable in theprovince of Alberta, without giving effect to any choice of law rules which may direct the application of the laws of another jurisdiction and shall be treated in all respects as an Alberta agreement.

23. All Claims, disputes or other matters in question between the Parties arising out of or relating in any way tothis Agreement, including but not limited to its formation, existence, validity, interpretation, performance, breach or termination (hereinafter collectively referred to as "**Disputes**") will be resolved pursuant to this Section 23.

a) Senior Officers' Conference: Except as set out herein, the Parties shall make reasonable efforts to resolve all Disputes by amicable negotiations as set out below.

i. A Dispute to which this provision applies shall initially be submitted to a senior officer ofeach Party. A senior officer of a Party is an officer of such Party with the authority to resolvethe Dispute.

ii. A Party that wishes to submit a Dispute to senior officers pursuant to this section shall serve upon the other Party a notice in writing ("**Senior Officer's Notice**") requesting that the Dispute be so referred. Within five (5) Business Days (as hereinafter defined) of the deliveryof a Senior Officer's Notice, the receiving Party shall submit a written response to the otherParty (a "**Response Notice**"). A Senior Officer's Notice and a Response Notice shall include: (a) a statement of the applicable Party's position and a summary of facts and arguments

supporting that position; and, (b) the name and title of the senior officer who willrepresent such Party.

iii. The Parties agree to consider and respond in a timely manner to any requests from the other Party for facts, information, and documents required to facilitate negotiations pursuant to this section.

iv. Nothing in this Section 23 shall prevent a Party from seeking interim or conservatory measures, including immediate injunctive relief or similar equitable relief. For greater certainty, a Party may at any time apply for interim or conservatory relief, including before or during the negotiation process set out in this Section 23. If the negotiation process has already commenced, it shall (unless the Parties agree otherwise) continuein parallel to the proceeding for interim or conservatory relief.

b) Court Proceeding: For matters requiring immediate injunctive or similar equitable relief, or where aDispute has not resolved within thirty (30) days (or such other period as the Parties may agree)

following the delivery of the Senior Officer's Notice, either Party may commence a court proceeding for a final determination of the Dispute and to obtain necessary relief. The Parties consent and submitto the exclusive jurisdiction of the Alberta Court of Queen's Bench located in Calgary for the finaldetermination and resolution of all Disputes.

Miscellaneous

24. Any notice, consent or approval required or permitted to be given in connection with this Agreement ("**Notice**") shall be in writing and shall be delivered (whether in person, by courier service or other personalmethod of delivery) or transmitted electronically to the following:

[redacted] [redacted]

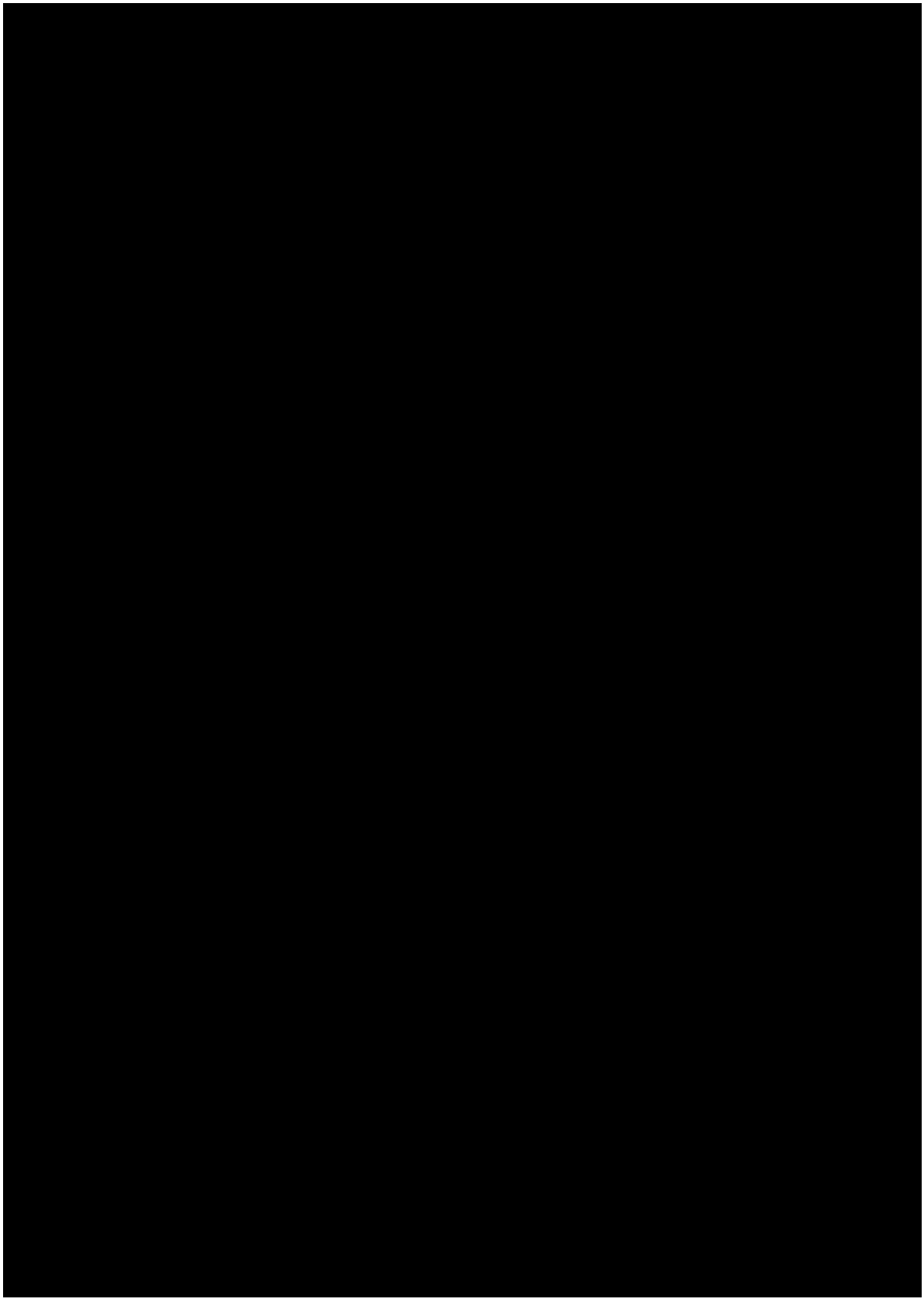
Any Notice delivered or electronically transmitted to a Party as provided above shall be deemed to have been given and received on the day it is delivered or transmitted, provided that (i) if it is transmitted electronically, the Party giving Notice receives written confirmation of receipt from the other Party, and (ii) it is delivered ortransmitted on a day on which commercial deposit taking banks are generally open for business in Calgary, Alberta, other than a Saturday, or a Sunday or a day observed as a holiday in such location ("**Business Day**")prior to 5:00 p.m. local time in the place of delivery or receipt. However, if the Notice is delivered or transmitted after 5:00 p.m. local time or if such day is not a Business Day then the Notice shall be deemed tohave been given and received on the next Business Day. Contact information contained herein may be updatedfrom time to time by the Parties.

25. This Agreement may not be assigned by any Party without the prior written consent of the other Party.
26. This Agreement enures to the benefit of and is binding upon the Parties and their respective administrators andsuccessors.
27. The Parties shall execute and deliver such further and other documents and do such further and other things, asmay be necessary, to carry out and give effect to the intent of this Agreement.
28. This Agreement shall constitute the entire agreement between the Parties with respect to the Agreement's subject matter and shall supersede all previous representations, oral or written, that may have been made by oron behalf of the Parties prior to the Effective Date.
29. No modification of, or amendment to, this Agreement shall be valid or binding unless set forth in writing, duly executed by the Parties and no waiver of any breach of any term or provision of this

Agreement shall be effective or binding unless made in writing and signed by the Party giving such waiver and unless otherwise provided, shall be limited to the specific breach which is waived.

30. This Agreement may be executed (including by electronic signature) in as many counterparts as may be necessary and delivered by email or other means of electronic transmission of documents and each such counterpart agreement or electronically transmitted copy so executed and delivered shall be deemed to be an original and such counterparts and electronically transmitted copies together shall constitute one and the sameinstrument.

IN WITNESS WHEREOF, the duly authorized representatives of the Parties have executed this Agreement as of the date first written above.



SCHEDULE "B"

Model of Notification and Response – Emergency on the Carway Line

1. In the event of an Emergency on the Carway Line, CMPL provides TCPL verbal notificationby phone from CMPL gas control [redacted] to TCPL gas control [redacted].
2. Upon receiving the notice from CMPL, TCPL Gas Control dispatches TCPL first responder,subject to eventual relief by a TCPL Incident Commander.
3. TCPL first responder or TCPL Incident Commander maintains communication with one orboth gas controls, as necessary.
4. TCPL establishes and maintains command and control until relieved by an CMPL Incident Commander.
5. TCPL takes operational actions, primarily the closure of TCPL's [redacted]

4.21 General and Site Specific Emergency Response Procedures

General Emergency Response Information

In any emergency situation, the order of priority must be the protection of life first, stabilize the incident second, and the conserve property last.

- Whenever the public is involved, all activities must be coordinated with civil authorities such as police, fire, or emergency response personnel. Whenever in a situation in which civil authorities are involved, the civil authority has jurisdiction over any activities that affect the general public. Is this true?
- Employees will refrain from making any statements to the press or others regarding the emergency. Refer all requests for information to the NorthWestern Energy Corporate Communication Director, See ***Emergency Operations Center Checklist-Section 1.4.***
- Personnel sent on patrol or to operate remote valves should be sent in pairs when possible to do so, and should be provided with all required PPE (see safety and health handbook) which includes but is not limited to the following items. A personal gas monitor, fire extinguisher, fire-resistant coveralls, hardhat, safety glasses, flashlights, company keys, and a cellular phone. Cell phone test calls shall be made to confirm consistent two-way availability.
  - **NOTE:** CMPL/NorthWestern Energy is not authorized to use any radio frequencies in Canada. Emergency response will be communicated through the use of cell phones and by handheld radios supplied by Cardston County Disaster and Emergency Services.
- In the case of any emergency on the CMPL pipeline, the Butte Gas Control office is to be notified immediately. Gas Control is manned 24/7, 365 days a year. Gas Control can be reached at the following numbers:
  - Gas Control 24/7 Emergency Telephone: (406) 782-6250
  - Gas Control Internal Extension: [redacted]

Necessary pipeline repairs may be coordinated southern Alberta contractors found in the ***Pipeline, Well and Storage Contractor Contacts-Section 5.3***

A checklist has been prepared for procedures for responding to Specific Incidents. They are described below with the location in the EPM.

- ***Fire Near or Directly Involving Pipeline Facility-See Section 2.1***
- ***Gas Detected Inside or Near a Building-See Section 2.2***
- ***Storage Well Loss of Control-See Section 2.3***
- ***Transmission Pipeline Blowing Gas or Generic Incident- See Section 2.4***
- ***Transmission Pipeline Explosion and/or Rupture-See section 2.5***

SECTION 5

5	Contacts
5.1	Civil Authorities Contacts
5.2	GTS Qualified Personnel and Contact List
5.3	Pipeline, Well and Storage Contractor Contacts
5.4	Landowner Contact Information-Canada
5.5	Emergency Response Contacts

5.1 Civil Authorities List

The following is the contact numbers for the Civil Authorities in Montana, South Dakota and Alberta

Location	Province/State	Phone Number
Calgary	AB	403-266-1234
Cardston County Fire	AB	403-653-1333
Cardston County RMCP	AB	403-653-4931
Lethbridge	AB	403-328-4444
Lethbridge Switchboard	AB	403-327-2210
ABSAROKEE	MT	406-322-5326
ALBERTON	MT	406-822-3555
ALDER	MT	406-843-5301
AMSTERDAM	MT	406-582-2100
ANACONDA	MT	406-563-5241
Anaconda-Deer Lodge Count	MT	406-563-5241
AUGUSTA	MT	406-447-8293
AVON	MT	406-846-2711
BAKER	MT	406-778-2879
BASIN	MT	406-225-4266
Beaverhead County	MT	406-683-3744
BELFRY	MT	406-446-1234
BELGRADE	MT	406-582-2092 option 2
BELT	MT	406-454-6978
Big Fork	MT	406-260-4165
BIG HORN	MT	406-342-5211
Big Horn County	MT	406-665-9780
BIG SANDY	MT	406-622-5451
BIG SKY	MT	406-582-2100
BIG TIMBER	MT	406-932-5143
BILLINGS	MT	(406) 657-8200 (if they are on the other line it will ring busy)
Blackfeet Tribe	MT	406-338-4009/ 406-338-2481
Blaine County	MT	406-357-3260/ 406-357-3310
BLUE BAY	MT	406-883-7301
BONNER	MT	406-728-0911
BOULDER	MT	406-225-4075
Box Elder (Hill County)	MT	406-265-2512
BOZEMAN	MT	406-585-1475
BRIDGER	MT	406-446-1234
BROADUS	MT	406-436-2333
Broadview	MT	406-657-8200
Broadwater County	MT	406-266-3441
BROWNING	MT	406-338-4000
BUTTE	MT	406-497-1130

Location	Province/State	Phone Number
Butte-Silver Bow County	MT	406-497-1130
Carbon County	MT	406- 446-1038/ 406- 446-1234
CARTER	MT	406-622-5451
CASCADE	MT	406-454-6978
Cascade County	MT	406-455-8555/ 406-771-1180
Central Montana	MT	406-535-1760
CHESTER	MT	406-759-5171
CHICO HOT SPRINGS	MT	406-222-2050
CHINOOK	MT	406-357-3260
CHOTEAU	MT	406-466-5781
Chouteau County	MT	406-622-5451
CHURCHHILL	MT	406-582-2100
CIRCLE	MT	406-485-3405
CLANCY	MT	406-225-4075
CLINTON	MT	406-728-0911
CLYDE PARK	MT	406-222-2050
COLSTRIP	MT	406-748-2211
COLUMBIA FALLS	MT	406-260-4165
COLUMBUS	MT	406-322-5326
CONDON	MT	406-728-0911
CONNER	MT	406-363-3033
CONRAD	MT	406-271-5723
COOKE CITY	MT	406-222-2050
Coram	MT	406-758-5585
CORVALLIS	MT	406-363-3033
CRAIG	MT	406-442-9111 (HELENA)
Custer County	MT	406-874-3320/ 406-232-3411
CUT BANK	MT	406-873-2711
Daniels County	MT	406-487-5561/ 406-487-2691
DARBY	MT	406-363-3033
Dawson County	MT	406-377-2364
DEER LODGE	MT	406-846-2711
DENTON	MT	406-535-3415
DILLON	MT	406-683-3700
DODSON	MT	406-654-2350
DRUMMOND	MT	406-859-3251
Dutton	MT	406-466-5781
EAST GLACIER	MT	406-873-2711
EAST HELENA	MT	406-449-0868
EKALAKA	MT	406-778-2879
EMIGRANT	MT	406-222-2050
ENNIS	MT	406-843-5301
FAIRFIELD	MT	406-466-5781

Location	Province/State	Phone Number
FAIRMONT	MT	406-563-5241
Fallon County	MT	406-778-7101/406-778-7121
Flathead County	MT	406-260-4164
FLORENCE	MT	406-363-3033
FLOWEREE	MT	(406) 622-5451
FORSYTH	MT	406-356-2715
FORT BELKNAP	MT	406-353-2933
FORT BENTON	MT	406-622-5451
FORT SHAW	MT	406-454-6978
FRENCHTOWN	MT	406-728-0911
FROMBERG	MT	406-446-1234
GALEN	MT	406-563-5241
Gallatin County	MT	406-585-1475
GALLATIN GATEWAY	MT	406-582-2100
GARDINER	MT	406-222-2050
Garfield County	MT	406-874-3320/ 406-232-3411
GARRISON	MT	406-846-2711
GEORGETOWN	MT	406-563-5241
GERALDINE	MT	406-622-5451
GILDFORD	MT	406-376-3100
Glacier County	MT	406-873-2711
GLASGOW	MT	406-228-4333
GOLD CREEK	MT	406-288-3542
Golden Valley County	MT	406-632-5614
Granite County	MT	406-859-3251
GRANTSDALE	MT	406-363-3033
GRASS RANGE	MT	406-535-3415
GREAT FALLS	MT	406-454-6978
HALL	MT	406-288-3542
HAMILTON	MT	406-363-3033
HARDIN	MT	406-665-9780
HARLEM	MT	406-357-3260
HARLOWTON	MT	406-632-5614
HATHAWAY	MT	406-356-2715
HAVRE	MT	406-265-4361
HELENA	MT	406-442-9111
HELMSVILLE	MT	406-846-2711
HIGHWOOD	MT	406-622-5451
Hilger	MT	406-538-3559
Hill County	MT	406-265-2512 x2107/ 406-265-4361
HOBSON	MT	406-535-3415
Hungry Horse	MT	406-758-5585
HUNTLEY	MT	406-967-2111

Location	Province/State	Phone Number
HUSON	MT	406-728-0911
HYSHAM	MT	406-342-5211
JACKSON	MT	406-689-3113
Jefferson County	MT	406-225-4075
JENS	MT	406-846-2711
JORDAN	MT	406-557-2540
JUDITH GAP	MT	406-632-5614
KALISPELL	MT	406-260-4164
Kremlin	MT	406-265-2512
Lake County-MT	MT	406-883-7321/ 406-883-7301
LAUREL	MT	406-628-8737
Laurel County	MT	406-628-8737
LAVINA	MT	406-568-2321
LENNEP	MT	406-535-3415
Lewis & Clark County	MT	406-442-9111
LEWISTOWN	MT	406-535-1800
LIBBY	MT	406-293-4112
Liberty County	MT	406-759-5673/ 406-759-5171
LINCOLN	MT	406-447-8293
Lincoln County	MT	406-293-4112 x223/ 406-297-2123
LIVINGSTON	MT	406-222-2050
LOGAN	MT	406-582-2100
LOLO	MT	406-728-0911
LOST CREEK	MT	406-563-5241
LOST TRAIL	MT	406-363-3033
LUTHER	MT	406-446-1313
Madison County- MT	MT	406-843-5301
MALTA	MT	406-654-2350
MANHATTAN	MT	406-585-1475 and 406-585-1480
Martin City	MT	406-758-5585
McCone County	MT	406-485-3405
Meagher County	MT	406-547-3397
MELSTONE	MT	406-323-1402
MILES CITY	MT	406-232-3411
MILL CREEK	MT	406-563-5241
MILLTOWN	MT	406-728-0911
Mineral County	MT	406-822-3555
MISSOULA	MT	406-728-0911
MOCCASIN	MT	406-535-3415
MONARCH	MT	406-454-6978
MONTANA CITY	MT	406-225-4075
MOORE	MT	406-535-3415
MUSSELSHELL	MT	406-323-1402

Location	Province/State	Phone Number
Musselshell County	MT	406-323-1402/ 406-323-3554
N. Carter County	MT	406-778-7101/406-778-7121
NEIHART	MT	406-454-6978
Norris	MT	406-843-5301
Northern Cheyenne Reserv.	MT	406-477-6288 / 406-477-6914
OPPORTUNITY	MT	406-563-5241
OVANDO	MT	406-846-2711
PARK CITY	MT	406-322-5326
Park County	MT	406-222-2050/ 307 344-2130
PHILIPSBURG	MT	406-859-3251
Phillips County	MT	406-654-2350
PLAINS	MT	406-827-3332
PLENTYWOOD	MT	406-765-1200
POLSON	MT	406-883-7301
PONY	MT	406-843-5301
POTOMAC	MT	406-728-0911
Powder River County	MT	406-436-2333/ 406-436-2051
Powell County	MT	406-846-2711
Prairie County	MT	406-778-7101/ 406-778-7121
PRAY	MT	406-222-2050
RADERSBURG	MT	406-266-3441
Ravalli County	MT	406-363-3033
RAYNESFORD	MT	406-535-1800
RED LODGE	MT	406-446-1234
REEDPOINT	MT	406-932-5143
REEDPOINT STILLWATER CT	MT	406-322-5326
Richland County	MT	406-433-2919
ROBERTS	MT	406-446-1234
Rocky Boy Reservation	MT	406-395-4513
Roosevelt County	MT	406-653-6213/ 406-653-6242
ROSCOE	MT	406-322-5326
Rosebud County	MT	406-346-2715
ROUNDUP	MT	406-323-1402
ROY	MT	406-535-3415
RUDYARD	MT	406-265-4361
RYEGATE	MT	406-568-2321
SAINT REGIS	MT	406-822-3555
SANDERS	MT	406-342-5211
Sanders County	MT	406-827-3584 x4 / 406-827-3584
SCOBEY	MT	406-487-2691
SEELEY LAKE	MT	406-728-0911
SHAWMUT	MT	406-632-5614
SHELBY	MT	406-434-5585

Location	Province/State	Phone Number
SHEPARD	MT	406-657-8200
SHERIDAN	MT	406-843-5301
Sheridan County	MT	406-765-1200
SIMMS	MT	406-454-6978
SPRINGSDALE	MT	406-932-5143
STANFORD	MT	406-535-1800
STEVENSVILLE	MT	406-363-3033
Stillwater County	MT	406-322-5326
SUN PRAIRIE	MT	406-454-6978
SUPERIOR	MT	406-822-3555
Sweet Grass County	MT	406-932-3011/ 406-932-5143
TERRY	MT	406-635-5738
Teton County	MT	406-466-5781
THOMPSON FALLS	MT	406-827-3332
THREE FORKS	MT	406-585-1475
Toole County	MT	406-434-5585
TOWNSEND	MT	406-266-3441
Treasure County	MT	406-346-2715
TWIN BRIDGES	MT	406-843-5301
TWO DOT	MT	406-632-5614
UTICA	MT	406-566-2212
VALIER	MT	406-271-4060
Valley County	MT	406-228-6277
VAUGHN	MT	406-454-6978
VICTOR	MT	406-363-3033
VIRGINIA CITY	MT	406-843-5301
WALKERVILLE	MT	406-497-1130
West Glacier	MT	406-758-5610
WEST YELLOWSTONE	MT	406-582-2100/ 406-646-7256/ 406-646-7600
Wheatland County	MT	406-632-5614
WHITE SULFUR SPRINGS	MT	406-547-3397
WHITEFISH	MT	406-260-4319
WHITEHALL	MT	406-287-3222/406-225-4075
Wibaux County	MT	406-778-7101/ 406-778-7121
WILSALL	MT	406-222-2050
WINDON	MT	406-535-3415
WINIFRED-MT	MT	406-535-3415
WINNETT	MT	406-535-3415
WISDOM	MT	406-689-3133
WISE RIVER	MT	406-689-3133
Wolf Creek	MT	406-442-9111 (HELENA)
Wolf Point	MT	406-653-6216
WOODS BAY	MT	406-883-7301

Location	Province/State	Phone Number
WOODSIDE	MT	406-363-3033
WORDEN	MT	406-967-2111
YELLOWSTONE CLUB	MT	406-582-2100
Yellowstone County	MT	(406) 657-8200 (If they are on the other line it will ring busy)
Grand Island / Alda	NE	308-385-5400
Kearney	NE	308-233-5200
North Platte	NE	308-535-6789
Aberdeen	SD	605-626-7911
Alexandria	SD	605-995-8400
Alpena	SD	605-353-8550
Altamont	SD	605-874-8212
Amherst	SD	605-448-5181
Andover	SD	605-882-6210
Arlington	SD	605-353-8550
Armour	SD	605-487-7625
Ashton	SD	605-472-4595
Athol	SD	605-472-4595
Aurora	SD	605-692-2113
Aurora Ethanol	SD	605-692-2113
Avon	SD	605-589-3942
Bancroft	SD	605-353-8550
Barnard	SD	605-626-7911
Beardsley	SD	605-995-8400
Bemis	SD	605-874-8212
Big Stone City	SD	320-235-1260
Big Stone Ethanol POET	SD	320-235-1260
Blunt	SD	605-773-7410
Bonilla	SD	605-353-8550
Bradley	SD	605-882-6210
Brentford	SD	605-472-4595
Bristol	SD	605-882-6210
Broadland	SD	605-353-8550
Brookings	SD	605-692-2113
Bryant	SD	605-882-6210
Butler	SD	605-882-6210
Canistota	SD	605-995-8400
Castlewood	SD	605-882-6210
Cavour	SD	605-353-8550
Chacellor	SD	605-764-5651
Chamberlain	SD	605-995-8400
Chancellor Ethanol POET	SD	605-764-5651
Chelsea	SD	605-472-4595

Location	Province/State	Phone Number
Chester	SD	605-256-7620
Claremont	SD	605-626-7911
Clark	SD	605-882-6210
Clark Colony	SD	605-353-8550
Clarmont Colony	SD	605-874-8212
Clear Lake	SD	605-874-8212
Columbia	SD	605-626-7911
Conde	SD	605-472-4595
Corsica	SD	605-487-7625
Cresbard	SD	605-472-4595
Crooks	SD	605-367-7000
Cuthbert	SD	605-772-4501
Dakota Ethanol	SD	605-256-7620
Dante	SD	605-487-7625
De Smet	SD	605-353-8550
Delmont	SD	605-487-7625
Dimock	SD	605-995-8400
Doland	SD	605-472-4595
Estelline	SD	605-882-6210
Ethan	SD	605-995-8400
Faulkton	SD	605-472-4595
Ferney	SD	605-626-7911
Florence	SD	605-882-6210
Fordham Colony	SD	605-353-8550
Forestburg	SD	605-772-4501
Frankfort	SD	605-472-4595
Freeman	SD	605-995-8400
Garden City	SD	605-882-6210
Garretson	SD	605-367-7000
Geddes	SD	605-487-7625
Glacial Lakes Mina Ethanol	SD	605-626-7911
Glendale Colony	SD	605-472-4595
Goodwin	SD	605-874-8212
Graceville Colony	SD	605-256-7620
Groton	SD	605-626-7911
Groton Ethanol POET	SD	605-626-7911
Grover	SD	605-882-6210
Harrisburg	SD	605-764-5651
Harrold	SD	605-773-7410
Hayti	SD	605-882-6210
Hazel	SD	605-882-6210
Henry	SD	605-882-6210
Highmore	SD	605-773-7410

Location	Province/State	Phone Number
Hillcrest Colony	SD	605-353-8550
Hillside Colony	SD	605-353-8550
Hitchcock	SD	605-353-8550
Holabird	SD	605-773-7410
Holmquist	SD	605-882-6210
Houghton	SD	605-626-7911
Howard	SD	605-772-4501
Hudson	SD	605-764-5651
Hudson Ethanol POET	SD	605-764-5651
Humboldt	SD	605-367-7000
Huron	SD	605-353-8550
Huron Ethanol	SD	605-353-8550
Hutterville Colony	SD	605-626-7911
Iroquois	SD	605-353-8550
Kampeska	SD	605-882-6210
Kaylor	SD	605-995-8400
Kimball	SD	605-995-8400
Kingsburg	SD	605-589-3942
Kranzburg	SD	605-882-6210
LaBolt	SD	605-882-6210
Lake Andes	SD	605-487-7625
Lake Norden	SD	605-882-6210
Lake Preston	SD	605-353-8550
Lane	SD	605-353-8550
Langford	SD	605-448-5181
Lennox	SD	605-764-5651
Lesterville	SD	605-668-5210
Letcher	SD	605-772-4501
Lily	SD	605-882-6210
Loomis	SD	605-995-8400
Loomis Ethanol POET	SD	605-995-8400
Loyalton	SD	605-472-4595
Madison	SD	605-256-7620
Manchester	SD	605-353-8550
Mansfield	SD	605-472-4595
Marion	SD	605-764-5651
Marion Ethanol	SD	605-764-5651
Marty	SD	605-487-7500
Maxwell Colony	SD	605-995-8400
Mayfield Colony	SD	605-353-8550
Mellette	SD	605-472-4595
Menno	SD	605-995-8400
Milbank	SD	605-432-5853

Location	Province/State	Phone Number
Milbrook Colony	SD	605-995-8400
Miller	SD	605-353-8550
Mina	SD	605-626-7911
Miranda	SD	605-472-4595
Mission Hill	SD	605-668-5210
Mitchell	SD	605-995-8400
Monroe	SD	605-764-5651
Montrose	SD	605-995-8400
Mount Vernon	SD	605-995-8400
Naples	SD	605-353-8550
New Elm Springs Colony	SD	605-995-8400
Northville	SD	605-472-4595
Oaklane Colony	SD	605-995-8400
Old Elm Springs Colony	SD	605-995-8400
Oldham	SD	605-353-8550
Olivet	SD	605-995-8400
Orient	SD	605-472-4595
Orland Colony	SD	605-995-8400
Parker	SD	605-764-5651
Parkston	SD	605-995-8400
Pierpont	SD	605-882-6210
Platte	SD	605-487-7625
Poinsett Colony	SD	605-882-6210
Ravinia	SD	605-487-7625
Raymond	SD	605-353-8550
Redfield	SD	605-472-4595
Redfield Energy Ethanol	SD	605-472-4595
Ree Heights	SD	605-353-8550
Renner	SD	605-367-7000
Revillo	SD	605-882-6210
Rockham	SD	605-598-6229
Rockport Colony	SD	605-995-8400
Roscoe	SD	605-472-4595
Rosedale Colony	SD	605-995-8400
Running Water	SD	605-589-3942
Scotland	SD	605-589-3942
Scotland POET Research Center	SD	605-589-3942
Sioux Falls	SD	605-367-7000
South Dakota Soybean	SD	605-692-2113
Spencer	SD	605-995-8400
Spink Colony	SD	605-472-4595
Springfield	SD	605-589-3942
St Lawrence	SD	605-353-8550

Location	Province/State	Phone Number
Stickney	SD	605-995-8400
Storla	SD	605-995-8400
Stratford	SD	605-626-7911
Tea	SD	605-764-5651
Tripp	SD	605-995-8400
Tulare	SD	605-472-4595
Turton	SD	605-472-4595
Tyndall	SD	605-589-3942
Utica	SD	605-668-5210
Vayland	SD	605-353-8550
Verdon	SD	605-626-7911
Vermillion	SD	605-677-7180
Vienna	SD	605-882-6210
Virgil	SD	605-353-8550
Volga	SD	605-692-2113
Volin	SD	605-668-5210
Wagner	SD	605-487-7625
Wallace	SD	605-882-6210
Warner	SD	605-626-7911
Watertown	SD	605-882-6210
Webster	SD	605-882-6210
Wecota	SD	605-472-4595
Wentworth	SD	605-256-7620
Wessington	SD	605-353-8550
Westport	SD	605-626-7911
White Lake	SD	605-995-8400
Willow Lake	SD	605-353-8550
Winfred	SD	605-256-7620
Wolsey	SD	605-353-8550
Woonsocket	SD	605-772-4501
Worthing	SD	605-764-5651
Yale	SD	605-353-8550
Yankton	SD	605-668-5210
Zell	SD	605-472-4595

5.2 GTS QUALIFIED PERSONNEL AND CONTACT LIST

Phone Bridge For Emergency Response Use: [redacted]

Work Location	First Name	Last Name	Title	Phone	Ext	Cell	Radio # Hand Held(HH) Vehicle Radio(VR)	First Responder	Hazardous Materials Technician Level	Incident Commander Level	EOC
[redacted]											

Work Location	First Name	Last Name	Title	Phone	Ext	Cell	Radio # Hand Held(HH) Vehicle Radio(VR)	First Responder	Hazardous Materials Technician Level	Incident Commander Level	EOC
[redacted]											

Work Location	First Name	Last Name	Title	Phone	Ext	Cell	Radio # Hand Held(HH) Vehicle Radio(VR)	First Responder	Hazardous Materials Technician Level	Incident Commander Level	EOC
[redacted]											

Work Location	First Name	Last Name	Title	Phone	Ext	Cell	Radio # Hand Held(HH) Vehicle Radio(VR)	First Responder	Hazardous Materials Technician Level	Incident Commander Level	EOC
[redacted]											

Work Location	First Name	Last Name	Title	Phone	Ext	Cell	Radio # Hand Held(HH) Vehicle Radio(VR)	First Responder	Hazardous Materials Technician Level	Incident Commander Level	EOC
[redacted]											

5.2 GTS QUALIFIED PERSONNEL AND CONTACT LIST

Phone Bridge For Emergency Response Use: [redacted]

Work Location	First Name	Last Name	Title	Phone	Ext	Cell
DIST - MANAGERS						
[redacted]						

Work Location	First Name	Last Name	Title	Phone	Ext	Cell
[redacted]						

Work Location	First Name	Last Name	Title	Phone	Ext	Cell
[redacted]						

5.3 Pipeline, Well and Storage Contractor List

Montana Pipline Contacts

Contractor	Location	Type of Service	Master Svc Agrmt	CLM #	Contact Name	Phone Number
[redacted]						

South Dakota Pipline Contacts

[redacted]						

Montana Well and Storage Contacts

[redacted]						

Contractor	Location	Type of Service	Master Svc Agrmt	CLM #	Contact Name	Phone Number
[redacted]						
[redacted]						
Out of State Well and Storage Contacts						
[redacted]						
[redacted]						
[redacted]						
[redacted]						
[redacted]						
Canadian Pipeline Contacts						
[redacted]						
[redacted]						
[redacted]						
[redacted]						
[redacted]						

5.4 LANDOWNER CONTACT INFORMATION-CANADA

See map on next page for coordinating color with landowner

Color	Qtr	Sec	Twn	Range	Full Name	Tenant or Landowner	Province	Phone #	Cell
[redacted]									
[redacted]									
[redacted]									
[redacted]									
Yellow	NW1/4	5	1	25W4M					
[redacted]									
[redacted]									
[redacted]									
[redacted]									
[redacted]									
Green	NW1/4	12	1	26W4M					
[redacted]									

5.4 [redacted]

[redacted]

5.5 Emergency Response Contact List

[redacted]

Organization/Department	Contact Time	Person to Contact	Phone Number	Contacted by:
Montana Public Service Commission		[redacted]		Refer to O & M
South Dakota Public Utilities Comission				Refer to O & M
National Response Center (NRC)		Report #: Contact Person:	1-800-424-8802	Refer to O & M
Pipeline and Hazardous Materials Safety Administration (PHSMA)		Report #: Contact Person:	1-800-467-4922 or 202-366-1074	Refer to O & M
Montana Department of Environmental Quality (DEQ)		Report #: Contact Person:	406-444-0379 or 406-444-2544	Environmental will contact
Montana Energy Office: Courtesy call informing of a potential Energy Emergency and/or Government Emergency Declaration		[redacted]		EOC
State of Montana Disaster & Emergency Services (DES)		Report #: Contact Person:	406-324-4777 or 406-431-0411	Safety will be contacted
South Dakota Department of Environmental & Natural Resources (DENR)		Report #: Contact Person:	605-773-5559 or 605-773-3153	Environmental will contact
South Dakota Office of Emergency Management		Report #: Contact Person:	605-773-3231 or 605-773-3178	Safety will be contacted
NorthWestern Energy Drug and Alcohol Testing		See ***Section 6.2*** of the GTS Emergency Procedures Manual	See ***Section 6.2*** of the GTS Emergency Procedures Manual	Follow Checklist
NorthWestern Energy Environmental Emergency Response		[redacted]		Refer to O & M
NorthWestern Energy Executive Management				Refer to O & M
NorthWestern Energy Corporate Communications				Refer to O & M
NorthWestern Energy Claims Department				Refer to O & M

Organization/Department	Contact Time	Person to Contact	Phone Number	Contacted by:
NorthWestern Energy Supervisor MT East Safety		[redacted]		Refer to O & M
NorthWestern Energy Supervisor MT West Safety				Refer to O & M
NorthWestern Energy Director of Wild Fire Mitigation				Refer to O & M
NorthWestern Energy Director of Central Operations				Refer to O & M
NorthWestern Energy Director of Montana Operations				Refer to O & M
NorthWestern Energy Director of Central Construction				Refer to O & M
NorthWestern Energy Director of SD/NE Operations				Refer to O & M
NorthWestern Energy Manager of Safety				Refer to O & M
NorthWestern Energy Manager of Safety				Refer to O & M
Montana or South Dakota Civil Authorities		See ***Section 5.1*** of the GTS Emergency Procedures Manual	See ***Section 5.1*** of the GTS Emergency Procedures Manual	Follow Checklist
NorthWestern Energy Gas Control		Various	[redacted]	Follow Checklist
NorthWestern Energy Backup Gas Dispatch		Various		Follow Flow Chart
NorthWestern Energy Grid Operations		Various		EOC
NorthWestern Energy Call Center		Various	**MT:** 1-888-467-2669 **SD/NE:** 1-800-245-6977	Follow Flow Chart
Emergency Locates		Various	811 or 1-800-424-5555	Follow Checklist
NorthWestern Energy's Director of Support Services		[redacted]		Refer to O & M
NorthWestern Energy's Physical Security Operations Center				Refer to O & M
NorthWestern Energy Large Customers				EOC
NorthWestern 24 hour Media Hotline		[redacted]	**MT:** 1-866-622-8081 or **SD:** 1-877-410-0154	Follow Checklist

Organization/Department	Contact Time	Person to Contact	Phone Number	Contacted by:
Transportation Safety Board of Canada		Report #: Contact Person:	Hotline: 819-997-7887	EOC
Canadian Energy Regulator (CER)		Report #: Contact Person:	403-807-9473	EOC
Transportation Safety Board and National Energy Board Online Reporting Link		Report #: Contact Person:	https://apps.neb-one.gc.ca/ers	EOC
Enviroment Canada		Report #: Contact Person:	780-951-8600 or 1-800-222-6514	EOC
Royal Canadian Mounted Police (Cardston County)		Various	Emergency: 403-653-4931	EOC
Royal Canadian Mounted Police (Cardston County)		[redacted]		EOC
Alberta Department of Transportation		Report #: Contact Person:	(24/7):403-381-5517 or 780-427-2731	EOC
Cardston County Chief Administrative Officer		[redacted]		EOC
Cardston County Emergency Services		Various	403-653-1333 403-653-4932	EOC
Cardston County Fire Chief		[redacted]		EOC
TransCanada Dispatch		Various	403-920-2401	EOC
Alberta One Call		Various	1-877-564-1490	EOC
Fortis Alberta (Distribution Disconnects)		Various	1-855-333-9473	EOC

SECTION 6

6	Post Incident
6.1	After Action report
6.2	Drug and Alcohol Program
6.3	Evaluation of Emergency Procedures
6.4	Lessons Learned Log

6.1 After Action Report

(To be completed electronically)

Contents

1. Introduction: *[Include brief synopsis of incident here]*

2. Sequence of events: *[Include detailed sequence of events here, if available]*

3. After Action Report (AAR) Overview:

- This report is a compilation of information from the different departments and staff who participated in the response to [*list incident/exercise/event here]*. The information was gathered by [*list departments here and various sources of information for the report]*
- The recommendations in this AAR should be viewed with considerable attention to the needs for a safe Gas Transmission & Storage System. In some cases, departments may determine that the benefits of implementation are insufficient to outweigh cost. In other cases, departments may identify alternative solutions that are more effective. However, each department should review the recommendations and determine the most appropriate action and time needed for implementation.
- The issues addressed in this AAR are being requested to be reviewed and thoroughly examined for the appropriation of needed resources to ensure the functions of incident response, stabilization and notification are efficient and effective.

3.1 Incident Overview: [Insert incident/exercise/event location here]

3.2 *Duration: [Insert incident/exercise /event time]*

3.3 Funding Source: [Insert funding source here or if no funding, insert "No funding allocated"]

3.4 *Focus: (Check appropriate area(s) below)*

- ☐ Prevention:
- ☐ Response
- ☐ Recovery
- ☐ Other

3.5 Activity or Scenario: (Check appropriate area(s) below)

- ☐ Fire
- ☐ Severe Weather
- ☐ Hazardous Material Release
- ☐ Bomb Threat
- ☐ Medical Emergency
- ☐ Power Outage
- ☐ Evacuation
- ☐ Lockdown
- ☐ Special Event
- ☐ Exercise/Drill
- ☐ Other

3.6 Location: [Insert incident/exercise/event location here]

3.7 Participating Organizations: [Insert organizations here]

3.8 *Strengths: [List strengths here]*

3.9 *Areas of Improvement: [List Areas of Improvement here]*

3.10 *Recommendations: [List Recommendations here]*

3.11 *Conclusion and Next Steps: [Insert Conclusion here]*

4. Improvement Planning Matrix:				
Area of Improvement	Improvement Action	Responsible Party/Area	Targeted Completion Date	Status

6.2 Drug and Alcohol Program

The comprehensive Drug and Alcohol Procedures for Northwestern Energy can be found in the Safety, Health, and Environmental Handbook located in Section 4.

Use the following instructions for administering the Drug and Alcohol Plan:

- This section is to be used to determine if an alcohol or drug test is required to be performed on a covered Northwestern Energy employee who has been involved in an accident and to provide instructions if a test is necessary.
- An alcohol and drug test must be performed if the employee's performance either contributed to or cannot be completely discounted as a contributing factor to one or multiples of the items listed below:
  - A fatality or personal injury necessitating in- patient hospitalization; or,
  - Estimated property damage of $50,000 or more, including loss to the operator and others, or both, but excluding cos of gas lost; or,
  - Unintentional estimated gas loss of three million cubic feet or more.
- As soon as practicable following an accident, NWE shall test each surviving covered employee for alcohol if that employee's performance of a covered function either contributed to the accident or cannot be completely discounted as contributing factor to the accident. The decision not to administer a test shall be based on NWE's determination, using the best available information at the time of the determination that the covered employee's performance could not have contributed to the accident.
- NWE shall prohibit a covered employee who has actual knowledge of an accident in which his or her performance has not been discounted by NWE as a contributing factor to the accident from using alcohol for **8 hours** following the accident, unless he or she has been given a post-accident test, or that NWE has determined that the employee's performance could not have contributed to the accident.
- If an alcohol test is not administered within **2 hours** following the accident, NWE shall prepare and maintain a record stating the reason the test was not promptly administered. If an alcohol test is not administered within **8 hours** following the accident, NWE shall cease attempts to administer a test and record the reason for not administering the test.
- An employee who is subject to post-accident alcohol testing who fails to remain readily available for testing or notifying NWE of his or her location if he or she leaves the scene of the accident prior to submission to a test may be deemed by NWE to have refused to submit to testing. Nothing stated here shall be construed to require the delay of necessary medical attention for injured people following an accident or to prohibit a covered employee from leaving the scene of an accident for the period necessary to obtain assistance in responding to the accident or to obtain necessary emergency medical care.
- Immediately notify one of the following Breath Alcohol Technicians (B.A.T.) who is nearest to the accident location:

- As soon as possible but no later than **32 hours** after an accident, NWE shall drug test each employee whose performance either contributed to the accident or cannot be completely discounted as a contributing factor to the accident. If an employee is injured, unconscious, or otherwise unable to consent to the test, all reasonable steps must be taken to obtain a urine sample. NWE may decide not to test but such a decision must be based on the best information available immediately after the accident that the employee's performance could not have contributed to the accident or that, because of the time between that performance and the accident, it is not likely that a drug test would reveal whether the performance was affected by drug use.

6.3 Evaluation of Emergency Response

Sheet must be turned into the Emergency Operations Commander

Section	Questions	Yes	No
1	If the emergency notice was given by telephone, were there any delays due to communication problems in initiating the response?		
•	Was the call properly evaluated by the person receiving the call with the proper questions asked?		
•	Was the call routed or dispatched to the correct person?		
•	Was the caller provided with the correct information?		
2	Were the personnel responding to the notice properly trained and equipped to protect life and property?		
•	Did the response personnel have the proper PPE and gas monitoring equipment (properly calibrated)?		
•	Did the response personnel have the proper tools and equipment to control the flow of gas?		
•	Was the situation evaluated and the steps of the emergency manual followed?		
3	Were there any avoidable delays in responding?		
4	Did any control room action contribute to the event? (for example – controller fatigue, procedure issues, SCADA system failures)		
5	Are there any procedural changes that would improve the ability to respond?		
6	Was gas shut off within a reasonable period of time?		
•	Was the curb valve and any other buried valves accessible?		
•	Was there a fire valve on the structure?		
•	Were the proper valve keys and wrenches available?		
7	Were operations at the scene properly communicated between the NWE response team and the other emergency responders?		
8	Were proper notification procedures followed and assistance requested if appropriate?		
•	Fire and police departments and other emergency responders?		
•	Supervisory personnel?		
•	Field, division, district, or area management?		
•	Risk Management?		

Section	Questions	Yes	No
•	Safety?		
	-		
•	Drug/alcohol representative?		
•	Gas Operations?		
9	Were incident documentation procedures adequate?		
•	Incident reports completed?		
•	Pictures taken and evidence preserved?		
10	Were samples of the failed facility or equipment sent for laboratory examination?		
11	Was the site restored and cleaned up?		
12	Was all PPE cleaned, replenished, and stored for reuse?		
13	Were all monitoring instruments recalibrated and batteries replaced for reuse?		
14	Were first aid kits replenished?		

Note on documentation – For routine incidents (such as hit service lines or small mains in open areas) not requiring the use of specialized equipment, the minimum documentation should include a copy of the gas service order with a review of the above areas where applicable. For major incidents (requiring the use of specialized equipment to control), documentation should include a copy of the service order and a written report of the above areas where applicable. **Any non "yes" answers require follow up.**

Name: _____

Date: _____

6.4 LESSONS LEARNED LOG

Incident Name:	Date:
Incident Description:	Ensure only valuable lessons are logged.

ID	Identified By	Subject	Situation	Recommendations & Comments	Follow-Up Needed?
1	John Doe	**EXAMPLE:** Issue escalation	**EXAMPLE:** Issue escalation took too long	**EXAMPLE:** Have in place a solid communication plan that outlines the escalation process, the roles & responsibilities of individuals involved in that process, and a required response time.	**Yes**

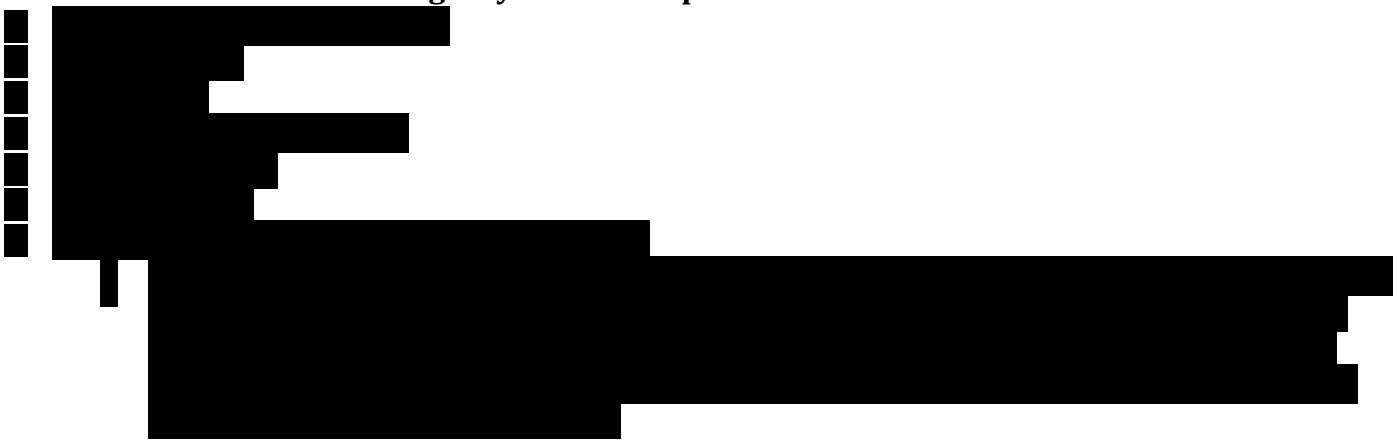
SECTION 7

7	Document Maintenance
7.1	Current Manual Version and References
7.2	GTS Emergency Procedures Manual Distribution List
7.3	Emergency Procedures Manual Review and Control Plan
7.4	Gas Transmission & Storage Emergency Procedures Manual Revision Log

7.1 Current Manual Version and References

The current version of this Emergency Procedures Manual is located here:

The current version of the Emergency Manual Map Book for Montana is located here:



The current version of the Emergency Manual Map Book for South Dakota is located here:

The current version of the GIS System Map is located here:

The current version of the Operations and Maintenance Manual is located here:

The current version of the Safety, Health, and Environmental Handbook is located here:

[redacted]

- **Included in the NorthWestern Energy Safety, Health, and Environmental Handbook are the following plans/policies (refer to them as needed):**
  - Traffic Control Plan
  - Fire Prevention and Protection Plan
  - Telecommunications Plan
  - Environmental Policy
  - Public Safety Plan
  - Personal Protective Equipment Plan
  - Work Zone Protection
  - Weather Planning
  - First Aid/CPR and Blood borne Pathogens Policy
  - Animal, Insect, and Wildlife Policy
  - Fire Prevention and Protection Policy
  - Waste Management Policy

[redacted]

7.2 GTS EMERGENCY PROCEDURES MANUAL DISTRIBUTION LIST

The tables below are the Distribution List for the Gas Transmission & Storage Emergency Procedures Manual and associated packets. The table denotes the number of distributed hard copies. Official printed copies are available upon request, you will be added to this list below to ensure you receive future updates.

Note: The most recent and current Emergency Procedures Manual is located electronically here:
[redacted]

FIRST RESPONER, INCIDENT COMMAND AND GAS CONTROL PACKET DISTRIBUTION LIST

[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
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[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

***# Of Copies Issued** represents the number of packets issued to vehicles or employees in the area. **# Of Copies Sent** represents the total number of packets issued to that area, the remainder of which are intended as backup copies and were not issued to a specific vehicle or employee. *I.e..) Jon LeFever has 16 vehicles assigned to him, therefore, he will assign 16 First Responders packets to each vehicle, and retain four copies for backup purposes, making the total number of copies sent to him as 20.*

GTS EMERGENCY PROCEDURES MANUAL DISTRIBUTION LIST

[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
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[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

REMEMBER SELF-PRINTED AND LOCALLY SAVED COPIES ARE UNCONTROLLED AND UNAUTHORIZED FOR OPERATIONAL USE.

7.3 Emergency Procedures Manual Review and Control Plan

Review and Update General Information

- The Gas Transmission Compliance Manager is directly responsible to ensure that revisions and updates are made to this manual. Only the controlled, official copy are available department-wide. Officially printed copies will be distributed by the Compliance Manager. Outdated physical copies will be destroyed by each individual when new revisions or updates take place. They will replace destroyed copies with valid new copies after disposal. Any drafts, old revisions, etc. are kept with the Compliance Manager.
- Any changes to this manual must be documented by records and be available for review during compliance inspections. These records may be memos, emails, a demonstrated change management process with justification, or any other method which demonstrates compliance with the applicable federal, state, and county pipeline safety regulations of both the United States of America and Canada.
- This manual in its entirety will be reviewed on an annual basis or every twelve months not to exceed fifteen months. The following sections of this manual are to specifically call out due to the high probability of changes that will occur in the above timeframe (personnel changes, contact number changes, equipment usage or updates, etc.):
  - GTS Qualified Personnel and Contact List-Section 5.2
  - Communication Procedures-Section 4.4
  - Pipeline, Well and Storage Contractor Contacts-Section 5.3
  - Civil Authorities Contact List-Section 5.1
  - Tools, Materials and Equipment List-Section 4.3
  - Current Manual Version and References-Section 7.1
  - GTS Emergency Procedures Manual Distribution List-Section 7.2
  - Area Maps General Information-Section 4.15
  - Land Owner Contact Information-Section 5.4
  - Canadian Schematic Drawings-Section 4.14

Review Process

- The Emergency Procedures Manual Committee (who reports to the Gas Transmission Compliance Manager and is the head of the Committee) will review any changes to code.
- The Committee will review all sections of the Emergency Procedures Manual paying special attention to the section listed above.
- The Emergency Procedures Manual and the Emergency Management Program will be updated as required.
- The Committee will review and approve/reject any changes or updates.
- The Gas Transmission Director and Compliance Manager will review updates and changes and either accept or reject them.
- Once approved the Emergency Procedures Manual will be published.
- The committee will then update any changes that will affect training.

Document Control Publishing the Emergency Procedures Manual

- The following steps will be taken after the Emergency Procedures Manual has been updated:
- New Copies will be printed by NorthWestern Energy's Creative Services.
- Every time the Emergency Procedures Manual is published it will be identified by a color that will be different from the previously published plans, i.e.

• 2024	• Green
• 2023	• Blue
• 2022	• Red
• 2021	• Purple
• 2020	• Green
• 2019	• Blue

-
- Utilizing the distribution list located in ***Section 7.2***, of this manual, all persons and areas will be required to send back the previously published version when the updated version arrives.
  - The Manager of Gas Transmission Compliance will ensure that the exact amount of copies originally sent to the areas are returned and destroyed

Publishing the Emergency Procedures Manual

- The Gas Transmission Compliance Manager will finalize the publishing update by utilizing NorthWestern Energy's management of Change Process, where a Management of Change Form will be sent to all appropriate employees.
- An always up to date (but redacted) version of the Emergency Procedures Manual will be published publically online at the following link: https://www.northwesternenergy.com/canadian-montana-pipeline-response-plan

- An always up to date version of the Emergency Procedures Manual will be available to all Gas Transmission and Storage Employees on NorthWestern Energy's internal SharePoint Site at the following link:
  [redacted]

Document Retention

- Following an Emergency the Gas Transmission Compliance Manager will be responsible for collecting all relevant paperwork associated with the Emergency.
- Once a review has been done the Compliance Manager will store the documentation on the following SharePoint Site:
  [redacted]
- Documentation will be retained for a period of at least three years.

7.4 GTS EMERGENCY PROCEDURES MANUAL REVISION LOG