Written Testimony Supporting Documents
PHMSA Regulatory Framework Examples
Dakota Gasification Company
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Carbon dioxide pipelines are among the most heavily regulated industries in the United States, with oversight provided by the Pipeline and Hazardous Materials Safety Administration (PHMSA). Under the existing PHMSA regulatory framework, our pipeline adheres to stringent compliance in several critical areas, supported by detailed processes and advanced technologies:

- **Pipeline Integrity Management:** This includes dispersion modeling based on specific pipeline operating conditions and route topography, Hazard Identification and Risk Assessment, and evaluation of threats such as third-party interference, internal and external corrosion, stress corrosion cracking, manufacturing defects, construction issues, weather and outside forces, equipment failure, and incorrect operations. Key activities include regular audits, performance metric reviews, management of change processes, corrosion control measures (e.g., cathodic protection, alternating current interference, close interval surveys, and commodity monitoring), in-line inspections, and incident reporting.

- **Public Awareness:** Efforts include receptor surveys, public awareness programs, contractor engagement, signage and markers, routine patrols, participation in the 811 one-call system, on-site monitoring, and pipeline locating to prevent accidental damages.

- **Control Room Management:** Measures include fatigue management, workload assessments, effective shift turnover protocols, supervisory control and data acquisition configuration, alarm management, and a robust leak detection system to ensure operational reliability.

- **Operator Qualification (OQ):** Operators and personnel are required to meet strict qualification requirements, complete task-specific training, undergo regular testing, and participate in refresher courses to ensure ongoing competency.

- **Emergency Response Planning (ERP):** A documented ERP includes the use of a reverse 911 notification system, regular liaison activities with public officials, stakeholder training, authority notifications, and post-incident reviews to improve future responses.

- **Operating and Maintenance:** Documented procedures guide all maintenance, operating, and emergency response activities. These procedures also integrate with the OQ program and provide guidelines for handling abnormal operations.

- **Drug and Alcohol Program:** A comprehensive program is in place to ensure compliance with testing and prevention standards.

- **Security:** Cybersecurity and physical security programs are implemented to protect critical infrastructure and operations. Additionally, security measures include fencing around above-ground assets, door alarms monitored by control room operators, and security cameras at select sites.

- **GIS Mapping:** GIS technology is used to identify geohazards and maintain detailed pipeline corridor maps.

Dakota Gas actively participates in the Pipeline Association for Public Awareness and North Dakota Pipeline Association to promote pipeline safety. These measures, combined with regular audits and regulatory updates, ensure our pipeline operates with the highest levels of safety, reliability, and compliance with PHMSA's rigorous standards.